

more clearly noted in the technical comments (deliverable for task 8b). The application provided basic information that may have met the criteria for administrative completeness by acknowledging the regulations, but did not provide any detail in how the facility would actually be in compliance.

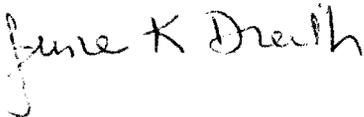
In addition, the application referenced much of the technical information to other documents or sections of the General Part A or B Permit (General Permit). Since these documents were not included as part of this review, it was difficult to ascertain whether the application was sufficient and acceptable. The application also stated that the General Permit will act as an umbrella document and cover all issues not addressed in the application. Therefore, the application is not a standalone document and the acceptability of the entire completeness of the permit application should only be conducted once all sections of the permit have been thoroughly reviewed.

The application also lacks detail regarding corrective actions. The application states that final assessment and remediation will be integrated and coordinated under corrective actions of the LANL Environmental Restoration Project (application Section 4.4), which would take the closure process outside of the permit. NMED may want to further investigate LANL's choice to close these areas as RCRA corrective action areas rather than addressing them in the application. In seeking RCRA permitted status for these units, LANL should address their closure within the application rather than as corrective action under the LANL Environmental Restoration Project. If NMED agrees with the status of administratively incomplete, specification of corrective actions may need to be addressed in a compliance schedule.

The deliverable is formatted in Word and was emailed to both of you at James_Bearzi@nmenv.state.nm.us and David_Cobrain@nmenv.state.nm.us, respectively, on March 12, 2002.

If you have any questions, please call me at (303) 763-7188.

Sincerely,



June K. Dreith
Program Manager
Enclosure

cc: Mr. Carl Will, NMED
Ms. Paige Walton, TechLaw
Mr. B. Jordan, TechLaw Central Files

TASK 8 A DELIVERABLE

**ADMINISTRATIVE COMPLETENESS REVIEW OF THE
LANL TA-55 PART B PERMIT APPLICATION, DATED JANUARY 2002**

Submitted by:

**TechLaw, Inc.
300 Union Boulevard, Suite 600
Lakewood, CO 80228**

Submitted to:

**Mr. Carl Will
Mr. James Bearzi
State of New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East
Building One
Santa Fe, New Mexico 87505**

In response to:

Work Assignment No. Y513.06082.360

March 2002

**ADMINISTRATIVE COMPLETENESS REVIEW OF THE LANL TA-55 PART B
PERMIT APPLICATION, DATED JANUARY 2002**

GENERAL COMMENTS

1. While much of the application was by definition administratively complete, the application was absent of detail, especially in regard to the eight container storage areas. While a generic application of the regulations was provided, the application did not provided detail as to how specifically the container storage areas and the other waste handling/treatment activities would meet the regulations. The application was found to be technically deficient, as noted in the accompanying technical review document. Revise the application to include details on how the container storage areas and the other waste handling/treatment activities will meet the regulations.
2. The application does not address the radiological components of the wastes. Radiological characterization is required for treatment, transportation and packaging of treated waste, disposal, decontamination and verification for closure. The application should address these issues or provide adequate references to documents that do address the radiological components of the waste.
3. Attachments B.1 and B.2, the Waste Analysis Plans for the cementation unit and vitrification unit, respectively, only provide information related to the waste analysis plan for the hazardous waste component of the mixed wastes. The general waste characteristic information for TA-55, including chemical and physical analysis and waste analysis requirements pertaining to land disposal restrictions for each unit, are provided in the LANL General Part B Permit. Therefore, the administrative completeness can only be determined for the hazardous components of the cementation and vitrification waste analysis plans. The LANL General Part B Permit should be reviewed to ensure that the information, when combined with the information contained in Attachments B.1 and B.2 of the TA-55 application, is administratively complete and meets all regulatory requirements.

**ADMINISTRATIVE COMPLETENESS REVIEW OF THE LANL TA-55 PART B
PERMIT APPLICATION, DATED JANUARY 2002**

SPECIFIC COMMENTS

1. Section 1.0, Introduction

This section only provides introductory information, which is not necessary for the evaluation of administrative completeness for the application.

2. Section 2.1, Container Storage (40 CFR 270.15 and 264.170 through 264.178)

More detailed information on the storage tank system was provided in Attachment G of the application. Refer also to comments related to Attachment G.

3. Section 2.1.1, Storage Capacities (40 CFR 270.14(b)(1))

This section meets the requirements for administrative completeness.

4. Section 2.1.2, Storage Containers (40 CFR 264.172)

This section does not meet the requirements for administrative completeness. The application must identify all waste containers to be permitted for storage at the TA-55 container storage units.

5. Section 2.1.3, Minimum Aisle Space and Storage Configuration (40 CFR 264.35)

This section does not meet the requirements for administrative completeness. The requirements for aisle space, as outlined in 20.4.1.500 NMAC (incorporating 40 CFR 264.35), state that aisle space must be maintained that will allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of the facility in an emergency. It is not apparent that the proposed aisle space meets this requirement.

6. Section 2.1.4, Authorized Waste Identification (40 CFR 268.50(a)(2)(i))

This section meets the requirements for administrative completeness.

7. Section 2.1.5, Condition of Containers (40 CFR 264.171)

This section meets the requirements for administrative completeness.

8. Section 2.1.6 Compatibility of Waste with Containers (40 CFR 264.172)

This section meets the requirements for administrative completeness.

9. Section 2.1.7, Management of Containers (40 CFR 264.173(a) and (b))

This section, including subsections 2.1.7.1 through 2.1.7.3, meets the requirements for administrative completeness.

10. Section 2.1.8, Containment Systems (40 CFR 270.15(a-b) and 264.175(a-b))

This section does not meet the requirements for administrative completeness. The application must identify all methods that will be used to determine the absence of free liquids in containers.

11. Section 2.1.9, Inspection Schedules and Procedures (refer to Attachment C comments)

This section references Attachment C of the application. Refer to the assessment of administrative completeness for Attachment C.2.

12. Section 2.1.10, Special Requirements for Ignitable, Reactive and Incompatible Wastes (40 CFR 270.14(b)(9), 270.15(b-c), 264.17(a-b), 264.176, and 264.177)

This section does not meet the requirements for administrative completeness. Pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.15(c)), drawings or other data must be provided which show the location of incompatible wastes and buffer zones around ignitable and reactive wastes.

13. Section 2.1.11, Closure (40 CFR 264.111 and 264.178, see also comments for Attachment F-1)

This section meets the requirements for administrative completeness.

14. Section 2.1.12, Control of Run-on and Runoff (40 CFR 170.14(b)(8)(ii) and 264.175(b)(4))

This section meets the requirements for administrative completeness.

15. Section 2.2, Storage Tank System (40 CFR 270.15 and 264.191 through 194)

More detailed information on the storage tank system was provided in Attachment H of the application. Refer also to comments related to Attachment H.

16. Section 2.2.1, Authorized Waste

The administrative completeness of this section cannot be determined, as the section references to the LANL General Part A Permit.

17. Section 2.2.2, Containment Systems (40 CFR 270.16(g) and 264.193(a-d))

This section does not meet the requirements for administrative completeness. Information must be included in the application that demonstrates, using calculations, that the containment system is designed to contain 100% of the capacity of the largest tank within its boundary. Refer also to the assessment of administrative completeness for Attachment H.3.

18. Section 2.2.3, Inspection Schedules and Procedures

This section references Attachment C of the application. Refer to the assessment of administrative completeness for Attachment C.3.

19. Section 2.2.4, Special Requirements for Ignitable, Reactive and Incompatible Wastes (40 CFR 270.16(j), 264.198 (a-b) and 264.199(a-b))

This section does not meet the requirements for administrative completeness. Information has not been provided which demonstrates compliance with 20.4.1.500 NMAC (incorporating 40 CFR 264.198(a) and (b) and 264.199). Refer also to the assessment of administrative completeness for Attachment H.4.

20. Section 2.2.5, Closure (40 CFR 264.111, see also Attachment F.2)

This section meets the requirements for administrative completeness. Refer also to the assessment of administrative completeness on the Storage Tank Closure Plan, Attachment F.2.

21. Section 2.2.6, Control of Runoff (40 CFR 270.14(b)(8)(ii) and 264.193(e)(i-ii))

This section meets the requirements for administrative completeness.

22. Section 2.3, Miscellaneous Unit – Cementation Unit

More detailed information on the cementation unit was provided in Attachment I of the application. Refer also to comments related to Attachment I.

23. Section 2.3.1, Authorized Waste

The administrative completeness of this section cannot be determined, as the section only provides a reference to the LANL General Part A Permit.

24. Section 2.3.2, Containment Systems (40 CFR 270.16(g) and 264.193(a-d))

This section, which refers to Section 2.2.2 of the application, does not meet the requirements for administrative completeness. As noted for Section 2.2.2, information

must be included in the application that demonstrates, using calculations, that the containment system is designed to contain 100% of the capacity of the largest tank or unit within its boundary.

25. Section 2.3.3, Inspection Schedules and Procedures

This section references Attachment C of the application. Refer to the assessment of administrative completeness for Attachment C.4.

26. Section 2.3.4, Special Requirements for Ignitable, Reactive and Incompatible Wastes (40 CFR 270.16(j), 264.198 (a-b) and 264.199(a-b))

This section does not meet the requirements for administrative completeness. Information has not been provided which demonstrates compliance with 20.4.1.500 NMAC (incorporating 40 CFR 264.198(a) and (b) and 264.199). Refer also to the assessment of administrative completeness for Attachment I.4. In addition, the containment system for the cementation unit is the same system to be used for the storage tanks and thus, the requirements for ignitable, reactive and incompatible wastes for a tank system are applicable to the cementation unit. The application must address the potential for incompatible wastes commingling as a result of a leak or spill from the storage tanks and cementation unit.

27. Section 2.3.5, Closure

This section meets the requirements for administrative completeness. Refer also to the assessment of administrative completeness on the Cementation Unit Closure Plan, Attachment F.3.

28. Section 2.3.6, Control of Runoff (40 CFR 270.14(b)(8)(ii))

This section meets the requirements for administrative completeness.

29. Section 2.4, Miscellaneous Unit – Vitrification Unit

More detailed information on the storage tank system was provided in Attachment J of the application. Refer also to comments related to Attachment J.

30. Section 2.4.1, Authorized Waste

The administrative completeness of this section cannot be determined, as the section only provides a reference to the LANL General Part A Permit.

31. Section 2.4.2, Containment Systems (40 CFR 270.16(g) and 264.193(a-d))

This section, which refers to Section 2.2.2 of the application, does not meet the requirements for administrative completeness. As noted for Section 2.2.2, information

must be included in the application that demonstrates, using calculations, that the containment system is designed to contain 100% of the capacity of the largest tank or unit within its boundary.

32. Section 2.4.3, Inspection Schedules and Procedures

This section references Attachment C of the application. Refer to the assessment of administrative completeness for Attachment C.5.

33. Section 2.4.4, Special Requirements for Ignitable, Reactive and Incompatible Wastes (40 CFR 270.16(j), 264.198 (a-b) and 264.199(a-b))

This section does not meet the requirements for administrative completeness. While reactive, ignitable and incompatible wastes will not be treated in the vitrification unit, itself, the containment unit to be used by the vitrification unit is the same as that to be used for the storage tanks and cementation unit, which may be used to store or treat reactive, ignitable and incompatible wastes, and thus the requirements as related to storage tanks are applicable. The application must address the potential for the vitrification unit to come into contact with these wastes as a result of a leak, rupture, spill, etc., from either a storage tank or the cementation unit.

34. Section 2.4.5, Closure (40 CFR 264.111)

This section meets the requirements for administrative completeness. Refer also to the assessment of administrative completeness on the Vitrification Unit Closure Plan, Attachment F.4.

35. Section 2.4.6, Control of Runoff (40 CFR 270.14(b)(8)(ii))

This section meets the requirements for administrative completeness.

36. Section 3.0, Other Federal Laws

The administrative completeness of this section cannot be evaluated. Information related to other Federal Laws is referenced to the LANL General Part B Permit.

37. Section 4.0, Corrective Action for Solid Waste Management Units (40 CFR 270.14(d)(1-3) and 264.101)

The administrative completeness of this section cannot be determined. Information demonstrating compliance with 20.4.1.900 NMAC (incorporating 40 CFR 270.14(d)(2) and (3)), has not been provided in the application. However, this information may be provided in the referenced reports: 1990 SWMU Report and the RFI Work Plan for Operable Unit 1129. These reports should be reviewed in conjunction with the application.

38. Section 4.1, TA-55 General SWMU Descriptions (40 CFR 270.14(d)(1))

This section does not meet the requirements for administrative completeness. In addition to the information provided in the application, for each solid waste management unit (SWMU) listed in Section 4.1, materials of construction, engineering drawings (if available) and the quantity and/or volumes of waste placed in each SWMU should be contained in the application.

39. Section 4.2, Releases (40 CFR 270.16(d)(2))

This section does not meet the requirements for administrative completeness. The application must identify all releases that may have occurred from all of the SWMUs identified in Section 4.1 of the application or provide justification that no release occurred from a particular SWMU. Releases may include spills, leaks, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing to the environment. In addition, the date of the release, type of waste released, quantity or volume released, nature of release, and groundwater monitoring and other analytical data available to describe the nature and extent of release should be provided. Other data may include physical evidence of distressed vegetation or soil contamination, historical evidence of releases, state, federal or local enforcement actions, public complaints and any other information showing migration of a release.

40. Section 4.3, Characterization of Release

The administrative completeness of this section cannot be determined, as this information is referenced to documents not provided with the application: the 1990 LANL SWMU Report and the RFI Work Plan for Operable Unit 1129.

41. Section 4.4, Corrective Actions (40 CFR 264.101(a-c) and 264 Subpart S)

This section does not meet the requirements for administrative completeness. The application contains a reference to how corrective action will be addressed in future actions. However, the application must address corrective action as required in 20.4.1.500 (incorporating 40 CFR 264.101(a) through 264.101(c) and 264 Subpart S).

42. Section 5.0, Certification (40 CFR 270.11)

This section meets the requirements for administrative completeness.

43. Attachment A.1, TA-55 General Description (40 CFR 270.14(b)(1))

This section meets the requirements for administrative completeness.

44. Attachment A.2, Traffic Patterns (40 CFR 270.14(b)(10))

This section, including subsections A.2.1 through A.2.4, meets the requirements for administrative completeness.

45. Attachment A.3, Location Information (40 CFR 270.14(b)(i-iv), 264.18(a-b) and 264 Appendix VI)

This section, including subsections A.3.1 and A.3.2, meets the requirements for administrative completeness.

46. Attachment A.4, Topographic Maps (40 CFR 270.14(b)(19))

This section meets the requirements for administrative completeness. However, the Los Alamos National Laboratory (LANL) facility-wide map was not included in the permit application, but is included in the LANL General Part A Permit Application. This map should be reviewed to ensure compliance with 20.4.1.900 NMAC (incorporating 40 CFR 270.14(b)(11)(i) and (ii)) and 20.4.1.500 NMAC (incorporating 40 CFR 264.95 and 97).

47. Attachment A.5, Groundwater Monitoring

Information related to groundwater monitoring is not provided in the permit application but referenced to Appendix A of the "LANL General Part B Permit". Therefore, administrative completeness for groundwater monitoring cannot be determined.

48. Attachment A.6, Other Permit Activities

This section does not contain information necessary for demonstration of administrative completeness of the application.

49. Attachment B.1.1, Facility Description (40 CFR 270.14(b)(1))

This section, along with other information provided throughout the application, meets the criteria for administrative completeness.

50. Attachment B.1.2, Description of Waste (40 CFR 270.14(b)(2) and 264.13(a)(1))

This section does not meet the criteria for administrative completeness. The application uses several vague descriptors (e.g., primarily, generally, and typically) as to the source of waste, type of waste and components of the waste. The application must discuss all waste streams that will be treated at the cementation unit and Table B.1-1 should reflect all of the waste streams and waste descriptions.

51. Attachment B.1.3.1, Proposed Analytical Parameters and Methods (40 CFR 270.14(b)(2) and 264.13(b)(1-2))

This section does not meet the requirements for administrative completeness. Pursuant to 20.4.1.500 NMAC (incorporating 40 CFR 264.13(b)(2)), the application must include all

of the test methods that will be used for the chosen parameters and not just methods that may be used.

52. Attachment B.1.3.2, Criteria and Rationale for Parameter Selection (40 CFR 264.13(b)(1))

This section does not meet the requirements for administrative completeness. The application indicates that acceptable knowledge (AK) will be used for waste characterization where possible. AK is acceptable only when adequate documentation/data from the process generator is available which shows consistency of the waste streams. However, where there is variability in waste streams, sampling must occur on a regular basis. A schedule of the frequency of sampling and sampling methods (pursuant to 20.4.1.500 NMAC, incorporating 40 CFR 264.13(b)(3) and (4)) must be included in the waste analysis plan as well as a specific decision-making process that defines when AK is acceptable and when sampling should be conducted.

53. Attachment B.1.4, Characterization Procedures (40 CFR 270.14(b)(2), 264.13(a)(1-3) and 264.13(b)(2))

This section does not meet the regulatory requirements for administrative completeness. The application indicates that most of the waste characterization will be based on AK. However, there is no decision tree to indicate when AK will not meet characterization requirements and when sampling is required, and the frequency at which sampling will be conducted. Also, the application must address how often sampling of waste streams will be conducted to ensure that the waste streams are consistent and AK is applicable.

54. Attachment B.1.4.1, Characterization Procedures for Waste to be Treated (40 CFR 270.14(b)(2) and 264.13(b)(2-4))

This section does not meet the requirements for administrative completeness. The application must include a decision tree indicating how it will be determined that AK is sufficient to define waste streams and specifically when sampling will be required. In addition, if sampling is necessary, the frequency and analytical parameters must be clearly identified. The sampling methods to be used to obtain a representative sampling of each waste stream and the appropriateness of these methods must also be provided. If LANL-specific protocol is to be used for sample collection, preservation, QA/QC and health and safety issues, then a specific reference to the protocol to be followed must be provided in the application.

55. B.1.4.2, Characterization Procedures for Treated Waste (40 CFR 270.14(b)(2) and 264.13(b)(2-4))

The administrative completeness of this section cannot be determined. The characterization processes to be used on the treated waste are referenced to the “LANL Transuranic Waste Certification Plan”, the “Waste Isolation Pilot Plant (WIPP) Waste Analysis Plan” permit conditions, and LANL-specific protocol. These documents should

be reviewed to ensure that appropriate regulatory requirements are satisfied. In addition, the LANL-specific protocol to be used for sampling techniques should be referenced so that the applicability and appropriateness of the methods can be determined.

56. Attachment B.1.4.3, Sample Handling, Preservation and Storage (40 CFR 264.13(b))

This section meets the requirements for administrative completeness.

57. Attachment B.1.4.4, Analytical Laboratory Selection and Analytical Methods (40 CFR 264.13(b)(2))

This section meets the requirements for administrative completeness. However, NMED may wish to evaluate whether an independent laboratory rather than LANL should perform waste analysis.

58. Attachment B.1.4.5, Reevaluation Frequencies (40 CFR 264.13(a)(3) and 264.13(b)(4))

This section does not meet the requirements for administrative completeness. The application is vague as to how waste stream verification will be conducted and when waste stream verification will be conducted for non-routinely generated wastes. No decision criteria outlining when reevaluation for non-routinely generated wastes is provided.

59. Attachment B.1.5, Special Procedural Requirements (40 CFR 270.14(b)(9), 268.7(a) and 268.7(b)(3-5))

This section meets the requirements for administrative completeness, provided that the treated wastes are shipped to the WIPP.

60. Attachment B.2.1, Facility Description (40 CFR 270.14(b)(1))

This section, combined with other facility information provided throughout the application, meets the requirements for administrative completeness.

61. Attachment B.2.2, Description of Waste (40 CFR 270.14(b)(2) and 264.13(a)(1))

This section meets the requirements for administrative completeness.

62. Attachment B.2.3.1, Proposed Analytical Parameters and Methods (40 CFR 270.14(b)(2) and 264.13(b)(1-2))

This section meets the requirements for administrative completeness.

63. Attachment B.2.3.2, Criteria and Rationale for Parameter Selection (40 CFR 264.13(b)(1-4))

This section does not meet the requirements for administrative completeness. The application indicates that acceptable knowledge (AK) will be used for waste characterization where possible. AK is acceptable only when adequate documentation/data from the process generator is available which shows consistency of the waste streams. However, where there is variability in waste streams, sampling must occur on a regular basis. A schedule of the frequency of sampling and sampling methods (pursuant to 20.4.1.500 NMAC, incorporating 40 CFR 264.13(b)(3) and (4)) must be included in the waste analysis plan as well as a specific decision-making process that defines when AK is acceptable and when sampling should be conducted. Radiological screening of samples to determine whether health and safety issues are a concern should also be conducted as part of characterization.

64. Attachment B.2.4.1, Characterization Procedures for Waste to be Treated (40 CFR 270.14(b)(2) and 264.13(b)(2-4))

This section does not meet the requirements for administrative completeness. The sampling methods to be used to obtain a representative sampling of each waste stream and the appropriateness of these methods must be provided. Sample collection frequency must also be discussed. If LANL-specific protocol is to be used for sample collection, preservation, QA/QC and health and safety issues, then a specific reference to the protocol to be followed must be provided in the application.

65. B.2.4.2, Characterization Procedures for Treated Waste (40 CFR 270.14(b)(2) and 264.13(b)(2-4))

The administrative completeness of this section cannot be determined. The characterization processes to be used on the treated waste are referenced to the “LANL Transuranic Waste Certification Plan”, the “Waste Isolation Pilot Plant (WIPP) Waste Analysis Plan” permit conditions, and LANL-specific protocol. These documents should be reviewed to ensure that appropriate regulatory requirements are satisfied. In addition, the LANL-specific protocol to be used for sampling techniques should be referenced so that the applicability and appropriateness of the methods can be determined.

66. Attachment B.2.4.3, Sample Handling, Preservation and Storage (40 CFR 264.13(b))

This section meets the requirements for administrative completeness.

67. Attachment B.2.4.4, Analytical Laboratory Selection and Analytical Methods (40 CFR 264.13(b)(2))

This section meets the requirements for administrative completeness. However, NMED may wish to evaluate whether an independent laboratory rather than LANL should perform waste analysis.

68. Attachment B.2.4.5, Reevaluation Frequencies (40 CFR 264.13(a)(3) and 264.13(b)(4))

This section does not meet the requirements for administrative completeness. The application is vague as to how waste stream verification will be conducted and when waste stream verification will be conducted for non-routinely generated wastes. No decision criteria outlining when reevaluation for non-routinely generated wastes is provided.

69. Attachment B.2.5, Special Procedural Requirements (40 CFR 270.14(b)(9), 268.7(a) and 268.7(b)(3-5))

This section meets the requirements for administrative completeness, provided that the treated wastes are shipped to the WIPP.

70. Attachment C.1, General Inspection Schedules and Requirements (40 CFR 270.14(b)(5), 264.15(a-d) and 264.33)

This section meets the requirements for administrative completeness.

71. Attachment C.2, Inspection Schedule and Requirements for the Container Storage Unit (40 CFR 264.15(b) and 264.174)

This section meets the requirements for administrative completeness.

72. Attachment C.3, Inspection Schedule and Requirements for the Storage Tank System (40 CFR 264.15(b), 264.193(i) and 264.195)

This section meets the requirements for administrative completeness.

73. Attachment C.4, Inspection Schedule and Requirements for the Cementation Unit (40 CFR 270.14(b)(5), 264.15(b) and 264.602)

This section meets the requirements for administrative completeness.

74. Attachment C.5, Inspection Schedule and Requirements for the Vitrification Unit (40 CFR 270.14(b)(5), 264.15(b) and 264.602)

This section meets the requirements for administrative completeness.

75. Attachment C.6, Additional Inspection Items (40 CFR 270.15(b)(5) and 264.33)

This section meets the requirements for administrative completeness.

76. Attachment C.7, Inspection and Monitoring for Units Subject to Subpart CC Requirements (40 CFR 264.1088)

This section meets the requirements for administrative completeness.

77. Attachment D, Personnel Training Plan (40 CFR 270.14(b)(12) and 264.16)

The administrative completeness cannot be determined. The application states that the Personnel Training Plan is addressed in the “Los Alamos National Laboratory (LANL) General Part B Permit Application”, Revision 1.0. The Personnel Training Plan as contained in the “LANL General Part B Permit Application” should be reviewed to ensure that applicable requirements outlined in 20.4.1.900 NMAC (incorporating 40 CFR 270.14(b)(12)) and 20.4.1.500 NMAC (incorporating 40 CFR 264.16) have been met.

78. Attachment E, Contingency Plan (40 CFR 270.14(b)(7), 264.50 through 264.56 and 264.52(b))

This section only meets the requirements for administrative completeness for emergency equipment requirements of a contingency plan, as listed in 20.4.1.500 NMAC (incorporating 40 CFR 264.52(e)). The application states that the contingency plan is addressed in the “LANL General Part B Permit Application”, Revision 1.0. The contingency plan as contained in the “LANL General Part B Permit Application” should be reviewed to ensure the contingency plan requirements outlined in 20.4.1.900 NMAC (incorporating 40 CFR 270.14(b)(7)) and 20.4.1.500 NMAC (incorporating 40 CFR 264.50 through 264.56 and 264.52(b)) are met.

79. Attachment F.1.1, General Closure Information (Container Storage Areas) (40 CFR 270.14(b)(13), 270.14(b)(15-18), 264.110 through 264.151 and 264.178)

This section, including subsections F.1.1.1 through F.1.1.9, meets the requirements for administrative completeness.

80. Attachment F.1.2.1, Estimate of Maximum Waste in Storage (40 CFR 264.112(b)(3))

This section meets the requirements for administrative completeness.

81. Attachment F.1.2.2, Description of Waste (40 CFR 264.112(b)(3))

This section meets the requirements for administrative completeness.

82. Attachment F.1.2.3, Removal of Waste (40 CFR 264.112(b)(3) and 264.178)

This section meets the requirements for administrative completeness.

83. Attachment F.1.2.4.1, Indoor Storage Area (40 CFR 264.112(b)(4))

This section meets the requirements for administrative completeness.

84. Attachment F.1.2.4.2, Vault (40 CFR 264.112(b)(4))

This section does not meet the requirements for administrative completeness. The permit must contain a description of all measures of decontamination for mixed waste (i.e., the decontamination measures that will be initiated to accomplish chemical decontamination, as well as to satisfy ALARA requirements for mixed waste in accordance with applicable DOE Orders) that may be applied in decontaminating the vault.

85. Attachment F.1.2.4.3, Outdoor Storage Pad (40 CFR 264.112(b)(4))

This section meets the requirements for administrative completeness.

86. Attachment F.1.2.5, Decontamination Equipment (40 CFR 264.112(b)(4))

This section meets the requirements for administrative completeness.

87. Attachment F.1.2.6, Decontamination Verification (40 CFR 264.112(b)(4-5) and 264.178)

This section meets the requirements for administrative completeness.

88. Attachment F.1.3, Sampling and Analytical Procedures (40 CFR 264.112(b)(4))

This section, including subsections F.1.3.1 through F.1.3.6, meets the requirements for administrative completeness.

89. Attachment F.2.1, General Closure Information (Storage Tank System) (40 CFR 270.14(b)(13), 270.14(b)(15-18), 264.110 through 264.151 and 264.197)

This section, including subsections F.2.1.1 through F.2.1.9, meets the requirements for administrative completeness.

90. Attachment F.2.2.1, Estimate of Maximum Waste in Storage (40 CFR 264.112(b)(3))

This section meets the requirements for administrative completeness.

91. Attachment F.2.2.2, Description of Waste (40 CFR 264.112(b)(3))

This section meets the requirements for administrative completeness.

92. Attachment F.2.2.3, Removal of Waste (40 CFR 264.112(b)(3-4) and 264.197)

This section does not meet the requirements for administrative completeness. The permit must address the requirements in 20.4.1.500 NMAC (incorporating 40 CFR 264.112(b)(4)), which requires submittal of a detailed waste removal plan.

93. Attachment F.2.2.4, Closure Procedures and Decontamination (40 CFR 264.112(b)(3-4) and 264.197)

This section does not meet the requirements for administrative completeness. As outlined in 20.4.1.500 NMAC (incorporating 40 CFR 264.112(b)(3) and (4)), a detailed description for the closure of each SWMU must include the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures and soils during partial and final closure, including, but not limited to, procedures for cleaning equipment and removing contaminated soils, methods for sampling and testing surrounding soils and criteria for determining the extent of decontamination required to satisfy the closure performance standard. Subsections F.2.2.4.1 through F.2.2.4.3 do not provide information to fulfill the requirements.

94. Attachment F.2.2.5, Decontamination Equipment (40 CFR 264.112(b)(3-4) and 264.197)

This section meets the requirements for administrative completeness.

95. Attachment F.2.2.6, Decontamination Verification (40 CFR 264.112(b)(3-5))

This section meets the requirements for administrative completeness.

96. Attachment F.2.3, Sampling and Analytical Procedures (40 CFR 264.112(b)(4))

This section, including subsections F.2.3.1 through F.2.3.6, meets the requirements for administrative completeness.

97. Attachment F.3.1, General Closure Information (Cementation Unit) (40 CFR 270.14(b)(13), 270.14(b)(15-18), and 264.110 through 264.151)

This section, including subsections F.3.1.1 through F.3.1.9, meets the requirements for administrative completeness.

98. Attachment F.3.2.1, Estimate of Maximum Waste in Storage (40 CFR 264.112(b)(3))

This section meets the requirements for administrative completeness.

99. Attachment F.3.2.2, Description of Waste (40 CFR 264.112(b)(3))

This section meets the requirements for administrative completeness.

100. Attachment F.3.2.3, Removal of Waste (40 CFR 264.112(b)(3-4))

This section does not meet the requirements for administrative completeness. The permit must address the requirements in 20.4.1.500 NMAC (incorporating 40 CFR 264.112(b)(4)), which requires submittal of a detailed waste removal plan.

101. Attachment F.3.2.4, Closure Procedures and Decontamination (40 CFR 264.112(b)(3-4))

This section does not meet the requirements for administrative completeness. As outlined in 20.4.1.500 NMAC (incorporating 40 CFR 264.112(b)(3) and (4)), a detailed description for the closure of each SWMU must include the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures and soils during partial and final closure, including, but not limited to, procedures for cleaning equipment and removing contaminated soils, methods for sampling and testing surrounding soils and criteria for determining the extent of decontamination required to satisfy the closure performance standard. Subsections F.3.2.4.1 through F.3.2.4.3 do not provide information to fulfill the requirements.

102. Attachment F.3.2.5, Decontamination Equipment (40 CFR 264.112(b)(3-4))

This section meets the requirements for administrative completeness.

103. Attachment F.3.2.6, Decontamination Verification (40 CFR 264.112(b)(5))

This section meets the requirements for administrative completeness.

104. Attachment F.3.3, Sampling and Analytical Procedures (40 CFR 264.112(b)(4))

This section, including subsections F.3.3.1 through F.3.3.6, meets the requirements for administrative completeness.

105. Attachment F.4.1, General Closure Information (Vitrification Unit) (40 CFR 270.14(b)(13), 270.14(b)(15-18), and 264.110 through 264.151)

This section, including subsections F.4.1.1 through F.4.1.9, meets the requirements for administrative completeness.

106. Attachment F.4.2.1, Estimate of Maximum Waste in Storage (40 CFR 264.112(b)(3))

This section meets the requirements for administrative completeness.

107. Attachment F.4.2.2, Description of Waste (40 CFR 264.112(b)(3))

This section meets the requirements for administrative completeness.

108. Attachment F.4.2.3, Removal of Waste (40 CFR 264.112(b)(3-4))

This section does not meet the requirements for administrative completeness. The permit must address the requirements in 20.4.1.500 NMAC (incorporating 40 CFR 264.112(b)(4)), which requires submittal of a detailed waste removal plan.

109. Attachment F.4.2.4, Closure Procedures and Decontamination (40 CFR 264.112(b)(3-4))

This section does not meet the requirements for administrative completeness. As outlined in 20.4.1.500 NMAC (incorporating 40 CFR 264.112(b)(3) and (4)), a detailed description for the closure of each SWMU must include the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures and soils during partial and final closure, including, but not limited to, procedures for cleaning equipment and removing contaminated soils, methods for sampling and testing surrounding soils and criteria for determining the extent of decontamination required to satisfy the closure performance standard. Subsections F.4.2.4.1 through F.4.2.4.3 do not provide information to fulfill the requirements.

110. Attachment F.4.2.5, Decontamination Equipment (40 CFR 264.112(b)(3-4))

This section meets the requirements for administrative completeness.

111. Attachment F.4.2.6, Decontamination Verification (40 CFR 264.112(b)(5))

This section meets the requirements for administrative completeness.

112. Attachment F.4.3, Sampling and Analytical Procedures (40 CFR 264.112(b)(4))

This section, including subsections F.4.3.1 through F.4.3.6, meets the requirements for administrative completeness.

113. Attachment G, Container Storage (40 CFR 270.15 and 264 Subpart I)

This section does not meet the requirements for administrative completeness. The application does not provide engineering drawings or figures for each container storage area showing waste placement by waste container type and locations of aisles. In addition, drawings do not demonstrate locations of containment systems and flow of liquids to collection areas.

114. Attachment G.1, Container Storage at TA-55 (40 CFR 270.14(b)(1), 264.171, and 264.172)

This section, including subsections G.1.1 through G.1.8, does not meet the requirements for administrative completeness. The application must identify all waste containers to be permitted for storage at each of the eight container storage locations.

115. Attachment G.2, Containment Systems (40 CFR 270.15(a)(1-5), 270.15(b)(1-2) and 264.175)

This section does not meet the requirements for administrative completeness. For containers bearing liquid wastes, the application does not provide the dimensions for containment systems and how many containers, by container type, the containment systems are designed for. In addition, the calculations of the capacity of the containment system relative to waste containers must be provided. For containers that will not contain liquid wastes, the application must provide the test procedures and results or other documentation for demonstrating that containers do not contain free liquids. The application must also identify each specific type of waste that will be permitted for storage at each of the container storage areas.

116. Attachment G.3, Special Requirements for Ignitable, Reactive and Incompatible Wastes (40 CFR 270.14(b)(9), 270.15(c-d), 264.17, 264.176 and 264.177)

This section does not meet the requirements for administrative completeness. The application must provide sketches, drawings, or data illustrating the location of buffer zones and containers holding ignitable or reactive wastes. The application must also provide the location of incompatible wastes.

117. Attachment H.1, Design, Construction, Materials and Operation (40 CFR 270.16(b-d) and 264.191(b)(1 and 3))

This section, including information provided in subsections H.1.1 through H.1.4 and Supplements H-1, H-2A, H-2B, H-2C, H-3 and H-4, meets the requirements of administrative completeness.

118. Attachment H.2, Installation, Testing and Certification (40 CFR 270.16(a), 270.16(f), 264.191(b), 264.192(a-b), and 264.192(d))

This section, including information provided in subsections H.2.1 through H.2.4 and Supplements H-1, H-2A, H-2B, H-2C, H-3 and H-4, meets the requirements of administrative completeness.

119. Attachment H.3, Secondary Containment (40 CFR 270.16(g) and 264.193)

This section does not meet the requirements for administrative completeness. Information must be included in the application that demonstrates, using calculations, that the external liner system is designed to contain 100% of the capacity of the largest tank within its boundary. The application is not clear whether the floor is sloped to allow collection of liquids.

120. Attachment H.4, Special Requirements for Ignitable, Reactive and Incompatible Wastes (40 CFR 270.16(g-h), 264.17, 264.198 and 264.199)

This section does not meet the requirements for administrative completeness. The application must provide information demonstrating compliance with 20.4.1.500 NMAC (incorporating 40 CFR 264.198(a)(1), 264.198(a)(3), 264.198(b) and 264.199).

121. Attachment H.5, Air Emission Standards for Equipment Leaks (40 CFR 264.1064(k) and 264 Subpart BB)

This section meets the requirements for administrative completeness.

122. Attachment H.6, Organic Air Emission Standards (40 CFR 264 Subpart CC)

This section meets the requirements for administrative completeness.

123. Attachment I.1, Design, Construction, Materials and Operation (40 CFR 270.23(a) and 264.601)

This section meets the requirements for administrative completeness.

124. Attachment I.2, Cementation Unit Demonstration of Treatment Effectiveness (40 CFR 270.23(d))

This section, including the information provided in Supplement I-2 of the application, meets the requirements for administrative completeness.

125. Attachment I.3, Environmental Performance Standards (40 CFR 270.23(b-c) and 264.601(a-c))

This section, including subsections I.3.1 through I.3.3, meets the requirements for administrative completeness.

126. Attachment I.4, Special Requirements for Ignitable, Reactive and Incompatible Wastes (40 CFR 270.14(b)(9), 264.17, 264.198 and 264.199)

This section does not meet the requirements for administrative completeness. The application must provide information demonstrating compliance with 20.4.1.500 NMAC (incorporating 40 CFR 264.198(a)(1), 264.198(a)(3), 264.198(b) and 264.199).

127. Attachment I.5, Air Emissions Standards for Equipment Leaks (40 CFR 264 Subpart BB)

This section meets the requirements for administrative completeness.

128. Attachment J.1, Design, Construction, Materials and Operation (40 CFR 270.23(a))

This section meets the requirements for administrative completeness.

129. Attachment J.2, Vitrification Unit Demonstration of Treatment Effectiveness Effectiveness (40 CFR 270.23(d))

This section does not meet the requirements for administrative completeness. The application has not provided information as to how mercury will be treated and the effectiveness of the waste management for mercury in the scrubber solution. In addition, a performance evaluation of the effectiveness of the off-gas system must be conducted.

130. Attachment J.3.1, Protection of Groundwater and Vadose Zone (40 CFR 270.23(b-c) and 264.601(a))

This section meets the requirements for administrative completeness.

131. Attachment J.3.2, Protection of Surface Water/Wetland/Soil Surface (40 CFR 270.23(b-c) and 264.601(b))

This section meets the requirements for administrative completeness.

132. Attachment J.3.3, Protection of the Atmosphere (40 CFR 270.23(b-c) and 264.601(c))

This section does not meet the requirements for administrative completeness. The application must address the effectiveness and reliability of the system, system failures during startup and shutdown and the presence of mercury in the scrubber solution.

133. Attachment J.4, Special Requirements for Ignitable, Reactive or Incompatible Wastes (40 CFR 270.14(b)(9), 264.17, 264.198 and 264.199)

This section does not meet the requirements for administrative completeness. While no ignitable, reactive, or incompatible wastes will be treated in the vitrification unit, the unit is located in the same room and utilizes the same secondary containment system as the storage tanks, which may be used for ignitable, reactive and/or incompatible wastes. Therefore, the application must address the potential for contact of these wastes with the vitrification unit and associated waste streams.

134. Attachment J.5, Air Emission Standards for Equipment Leaks (40 CFR 264 Subpart BB)

This section meets the requirements for administrative completeness.

135. Attachment K.1, Security and Access (40 CFR 270.14(b)(4), 270.14(b)(19)(viii) and 264.14)

This section meets the requirements for administrative completeness.

136. Attachment K.2.1, Required Equipment (40 CFR 264.32)

This section meets the requirements for administrative completeness.

137. Attachment K.2.2, Testing and Maintenance of Equipment (40 CFR 264.33)

This section meets the requirements for administrative completeness.

138. Attachment K.2.3, Access to Communication or Alarm Systems (40 CFR 264.34)

This section meets the requirements for administrative completeness.

139. Attachment K.2.4, Aisle Space Requirements (40 CFR 264.35)

This section does not meet the requirements for administrative completeness. The requirements for aisle space as outlined in 20.4.1.500 NMAC (incorporating 40 CFR 264.35) state that aisle space must be maintained that will allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of the facility in an emergency. It is not apparent that the proposed aisle space meets this requirement.

140. Attachment K.2.5, Support Agreements with Outside Agencies (40 CFR 264.37(a))

The administrative completeness for this section cannot be determined. The application states that information regarding support agreements and contracts with outside agencies for emergency response is provided in the LANL General Part B Permit.

141. Attachment K.3, Hazards Prevention (40 CFR 270.14(b)(8) and 264 Subpart C)

This section, including subsections K.3.1 through K.3.6, meets the requirement for administrative completeness.

142. Attachment K.4, Recordkeeping Requirements (40 CFR 264.75, 264.76 and 264.77)

This section, including subsections K.4.1 through K.4.3, meets the requirements for administrative completeness.