

TH 55



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

November 2, 1993

Mr. Jerry L. Bellows, Area Manager
Los Alamos Area Office
Department of Energy
528 35th Street
Los Alamos, New Mexico 87544-5000

RE: ADMINISTRATIVE REVIEW: NOTICE OF DEFICIENCY
NM0890010515

Dear Mr. Bellows:

The New Mexico Environment Department (NMED) has completed its administrative review of the Department of Energy (DOE)/Los Alamos National Laboratory (LANL) Temporary Emergency Permit Application to allow the processing of nitrated cellulose cheesecloth at Technical Area 55. The Temporary Emergency Permit Application is being reviewed under the New Mexico Hazardous Waste Management Regulations and has been found to be incomplete. The deficiencies to be addressed are described in the enclosed three (3) page attachment. The regulations cited in the attachment are the New Mexico Hazardous Waste Management Regulations (HWMR-7).

Submit all information within thirty (30) days of receipt of this Notice of Deficiency. If you fail to provide the information within the thirty (30) days, you may receive a Notice of Violation and the facility may be subject to permit denial pursuant to HWMR-7 Part IX, 40 CFR Section 270.10(c). In cases where specific information cannot be provided within the thirty (30) day period, an extension to submit such information may be requested.

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If you have any questions, contact Carl Stubbs at (505) 827-4308.

Sincerely,


Barbara Hoditschek
Program Manager
RCRA Permit Section

Enclosure.

xc: Benito Garcia, NMED, HRMB
David Neleigh, US EPA Region VI
File Red

NOTICE OF DEFICIENCY

1. Deficiency

The Environmental Protection Agency (EPA) hazardous waste number of the hazardous waste in question has not been identified.

Recommended Changes for the Amended Emergency Permit Application

Provide the EPA hazardous waste number and provide justification for the waste code through the use of process knowledge. At previous meetings a hazardous waste organic solvent has also been mentioned, but not identified. Identify this solvent(s) and their EPA hazardous waste number if any.

2. Deficiency

There is no description of the report due at the conclusion of the activity.

Recommended Changes for the Amended Emergency Permit Application

Describe the contents of the "conclusion of activity" report and when it will be delivered to the Secretary.

3. Deficiency

Facility location information (i.e. topological map, discussion of seismic activity and floodplain) has not been provided.

Recommended Changes for the Amended Emergency Permit Application

Provide this information or justify an exemption from this requirement.

4. Deficiency

A description of how ground water, surface water, and the atmosphere will be protected has not been provided.

Recommended Changes for the Amended Emergency Permit Application

Provide a description of how ground water, surface water, and the atmosphere will be protected (through monitoring, corrective action, analysis, inspection, response reporting, etc.) or justify an exemption from this requirement.

5. Deficiency

Sampling and analysis after treatment of the nitrated cellulose

rag does not include testing for the characteristics of ignitability and reactivity.

Recommended Changes for the Amended Emergency Permit Application

Describe the analytical procedures to be used to demonstrate that the treated nitrated cellulose rag does not exhibit the characteristics of ignitability and reactivity. This description should include a discussion of Quality Assurance/Quality Control (QA/QC).

7. Deficiency

The discussion of general inspection procedures does not provide sufficient detail to determine regulatory adequacy.

Recommended Changes for the Amended Emergency Permit Application

Describe the schedule (written or otherwise) developed for inspecting monitoring equipment, operating and structural equipment that are important to preventing, detecting, or responding to environmental or human health hazards.

8. Deficiency

The contingency discussion does not provide sufficient detail to determine regulatory adequacy.

Recommended Changes for the Amended Emergency Permit Application

Provide copies of the Contingency Plans for Los Alamos National Laboratory and any specific Plan for TA-55, Building 4 if applicable.

9. Deficiency

A description of the emergency procedures that will be activated for equipment or power failure have not been provided.

Recommended Changes for the Amended Emergency Permit Application

Describe the emergency procedures that will be activated for equipment or power failure.

10. Deficiency

A description of the procedures for prevention of reaction of ignitable and reactive wastes has not been provided.

Recommended Changes for the Amended Emergency Permit Application

Describe the procedures for prevention of reaction of ignitable and reactive wastes.

11. Deficiency

The discussion of personnel training is insufficient to determine regulatory adequacy.

Recommended Changes for the Amended Emergency Permit Application

Provide a list of titles of the required training. Describe the program referred to as "On-the-job-training".