

MEMORANDUM

TO: The Record

FROM: Stephanie Kruse, Environmental Specialist, Hazardous and Radioactive Materials Bureau

SUBJECT: RCRA Emergency Permit No. NM0890010515-EP1 for Treatment of Nitrated Cheesecloth: DOE/LAAO Review

DATE: May 24, 1994

On May 6, 1994, the US Department of Energy/ Los Alamos Area Office (DOE/LAAO) requested review of the above referenced emergency permit before it was issued in final form. Review was completed on May 23, 1994. The requested changes are agreeable to the Department and have been made. These changes are:

p. I - 1, Permit Condition I.A., EFFECT OF PERMIT

"The Permittee is allowed to ~~treat hazardous subject~~ mixed waste to ~~thermal decomposition....~~" "Treatment" has been changed to "process" or "thermal decomposition" and "treat" to "processing" throughout. Also, the word, "hazardous", is dropped from the phrase, "hazardous mixed waste", as redundant.

P. I - 1, Permit Condition I.D., DEFINITIONS

"... 'hazardous waste management unit' or 'unit' means ~~Room 420 the Inert Atmosphere Decomposing Unit and appurtenances, as described in Permit Condition III.A., located in Room 420 or the adjoining room, Building 4 (the Plutonium Facility), Technical Area 55....~~" This change is made because Room 420 will be used for other purposes besides processing of the nitrated cheesecloth during the time period of the permit.

P. I - 2, Permit Condition I.E.2., Term of Permit

A new Permit Condition I.E.2. is inserted, to read, "This permit is effective as of the date of signature by the Secretary or of the date when the present stand-down order at Building 4 (the Plutonium Facility), Technical Area 55 is rescinded, whichever is later, but in no case later than August 1, 1994. If the effective date of this permit is determined by the ending of the present stand-down order at Building 4, the Permittee shall inform the Department of this fact verbally concurrently with start of activities under this permit and in writing within seven (7) days." This change is made

TA 55

R



4372

because the present stand-down order precludes processing activities under this permit.

Following permit conditions under I.E. have been renumbered accordingly.

P. I - 3, Permit Condition I.E.8., Proper Operation and Maintenance

"The Permittee shall at all times properly operate and maintain the ~~unit and processing and control systems of treatment and control~~"

p. I - 6, Permit Condition I.E.15.b.ii.

"~~Name, address, and telephone number~~ Location of the unit and the telephone number of the party responding to the occurrence;..."
This change is made for clarification purposes.

p. I - 7, Permit Condition I.I , DOCUMENTS TO BE MAINTAINED AT THE FACILITY

"The Permittee shall maintain at the unit, until ~~treatment of the regulated material is completed and certified by an independent, registered professional engineer, and cessation of treatment~~ the Final Report required under Permit Condition II.K. is approved by the New Mexico Environment Department,..." This change is made because, while certification by a registered professional engineer is required under the New Mexico Hazardous Waste Management Regulations for closure, it is not required for completion of a treatment process.

p. II - 4, Permit Condition II.K.1., Time Frame for Completion

"...the Permittee shall submit a Final Report to the Secretary within 60 days after completion of ~~treatment processing~~....The report shall also include a determination that all of the nitrated cheesecloth stored for ~~treatment processing~~ at Building 4 has been ~~treated processed~~ so as to render it nonhazardous...."

p. II - 4, Permit Condition II.K.2., Certification of Completion

"...the hazardous waste ~~treatment~~ ~~thermal decomposition~~ process...."

P. II - 4, Permit Condition II.K.3., Survey Plat

"~~The Permittee shall include a survey plat showing the location of Building 4 in the Final Report required by Permit Condition II.K.1.~~" Section II.K.3. is deleted. While a survey plat is

required for closure, it is not required for completion of a treatment process.

p. III - 1, Permit Condition III.A., TREATMENT AND EQUIPMENT DESCRIPTION

Paragraph 1: "The ~~treatment~~ process...."

Paragraph 2: "...The cheesecloth is placed in a stainless steel vessel and lowered into a furnace well (the Inert Atmosphere Decomposing Unit), all contained in a stainless steel glovebox...." This change is made for clarification purposes.

Paragraph 2: "...Complete ashing of the cheesecloth will occur, resulting in ~~100 percent volatilization of all products except plutonium~~ the residual material no longer exhibiting the characteristics of ignitability and reactivity."

Paragraph 4: "...All other ~~residues~~ materials associated with this thermal decomposition process are, at the end of the process, not hazardous ~~or are no longer hazardous~~ and are may be used in the plutonium recovery process."

"MODULE III - TREATMENT PROCESSING ROOM AND EQUIPMENT"

"P. III - 1, Permit Condition III.A., DESCRIPTION OF THERMAL DECOMPOSITION PROCESS TREATMENT AND EQUIPMENT DESCRIPTION"

P. III - 2, Permit Condition III.B., IDENTIFICATION OF PERMITTED AND PROHIBITED WASTE, III.B.1.

Paragraph 1: "The Permittee may ~~treat~~ process the following wastes in ~~containers at the facility the Inert Atmosphere Decomposing Unit in Room 420....~~" This change is made to make it clear that the "containers" referred to are not the containers used to store the mixed waste before processing.

Table footnote: "* Not regulated under ~~this permit the New Mexico Hazardous Waste Management Regulations.~~" This change is made to make it clear that the plutonium is not regulated under some other State hazardous waste management permit.

P. III - 2, Permit Condition III.B.2.

"~~Treatment~~ Processing of waste under this permit...."

LANL: Emergency Permit EP1
May 24, 1994
Page 4

P. III - 2, Permit Condition III.B.C.

"The Permittee is prohibited from ~~treating~~ ~~processing~~ hazardous waste...."

P. III - 2, Permit Condition III.C., CONDITION OF EQUIPMENT AND CONTAINERS

"If equipment and containers holding hazardous waste for ~~treatment~~ ~~processing~~...."

P. III - 2, Permit Condition III.E., SPECIAL CONTAINER PROVISIONS FOR IGNITABLE AND REACTIVE WASTE

"...ignitable and reactive waste to be ~~treated~~ ~~processed~~...."