

SNL 2002



**Department of Energy
National Nuclear Security Administration**

Albuquerque Operations Office
Office of Kirtland Site Operations
P.O. Box 5400
Albuquerque, New Mexico 87185-5400

DEC 09 2002

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James Bearzi, Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Dr. East, Bldg 1
Santa Fe, NM 87505

Dear Mr. Bearzi:

The purpose of this letter is to provide a response to comments 509 through 524 in Notice of Deficiency HWB-SNL-02-002 for Sandia National Laboratories, EPA ID #NM5890110518.

On October 15, 2002, the U.S. Department of Energy / National Nuclear Security Administration (DOE) and Sandia Corporation (Sandia) received the Notice of Deficiency (NOD). It includes a set of 524 comments that list the issues DOE/Sandia should address and the additional information that DOE/Sandia should provide to NMED before NMED can make a determination on the administrative and technical completeness of the Comprehensive Part B Permit Request for RCRA-regulated waste storage and treatment operations at Sandia National Laboratories/New Mexico (SNL/NM).

NMED comments 509 through 524 address the Low Temperature Thermal Desorption Unit at SNL/NM. The comments are included in Attachment A to this letter, together with DOE/Sandia's response.

The Part B submittal contained, as the LTTD permit application, the Temporary Authorization Request for the LTTD Unit, originally submitted and approved in 1998. As noted in Comment 509 and in the NMED letter of March 22, 2002 regarding the General Part A submittal, the NMED has determined that the temporary authorization is no longer valid and that a separate permit application for LTTD operation is required. Based on this direction, DOE and Sandia transmitted a newly-prepared Class 2 permit modification request for operation of the LTTD unit on June 11, 2002. The NMED subsequently issued a temporary authorization to begin operations, and on September 24, 2002, transmitted a final approval, with conditions, of the Class 2 modification. DOE and Sandia are now operating the LTTD unit under the final approval; LTTD operations are expected to be complete by early December. Due to these changes in the permitting authority for the LTTD unit, specific responses to Comments 509 through 524 are unnecessary.

SNL1003



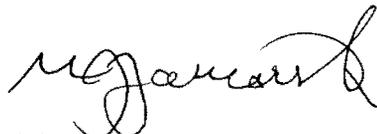
Mr. John Kieling

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DEC 9 2002

If you have any questions regarding this submittal, please contact John Gould of my staff at (505) 845-4428.

Sincerely,



Michael J. Zamorski
Director

Enclosure

cc w/enclosure:

W. Moats, NMED-HWB

R. Kennett, NMED-OB

D. H. Blanton, SNL, MS 0186, 3000

E. D. Krauss, SNL, MS 0141, 11300

SNL ISS Records Center, MS 0651, 9612

SSO Legal File

cc w/o enclosure:

L. A. West, SNL, MS 1114, 3100

P. D. Yourick, SNL, MS 1050, 3120

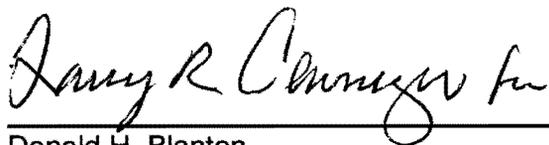
J. J. Thompson, SNL, MS 1151, 3125

A. S. Reiser, SNL, MS 1151, 3125

Response to Comments 509 through 524 in Notice of Deficiency HWB-SNL-02-002 for Sandia National Laboratories, EPA ID #NM5890110518

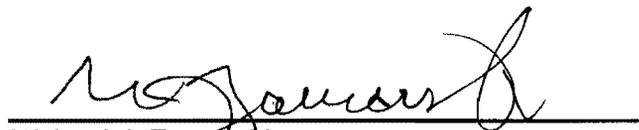
CERTIFICATION STATEMENT

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.



Donald H. Blanton
Vice President, Human Resources and Protection
Services
Sandia Corporation
Albuquerque, New Mexico
Co-Operator

12/3/2002
Date signed



Michael J. Zamorski
Director
U.S. Department of Energy
National Nuclear Security Administration
Sandia Site Office
Owner and Co-Operator

12/5/02
Date signed

Attachment A

DOE/Sandia Response to NMED Comments 509-524

Task # HWB-SNL-02-002

NO	NMED COMMENT	DOE/SNL RESPONSE
509	<p>LTTD Temporary Authorization Request, April 1998. Submitted as a permit application.</p> <p>NMED approved a Temporary Authorization for the LTTD unit on April 6, 1998 that is no longer effective because of the substantial time period that has passed since its approval. The current request for a temporary authorization is denied because there is now sufficient time to permit the unit. The request for a temporary authorization should be re-submitted as an application to permit and operate a Subpart X miscellaneous unit as required by 20.4.1.500 NMAC incorporating 40 CFR Subpart X.</p>	<p>Comments 509 through 524 address the Low-Temperature Thermal Desorption (LTTD) unit. The Part B submittal contained, as the LTTD permit application, the Temporary Authorization Request for the LTTD Unit, originally submitted and approved in 1998. As noted in Comment 509 and in the NMED letter of March 22, 2002 regarding the General Part A submittal, the NMED has determined that the temporary authorization is no longer valid and that a separate permit application for LTTD operation is required. Based on this direction, DOE and Sandia transmitted a newly-prepared Class 2 permit modification request for operation of the LTTD unit on June 11, 2002. The NMED subsequently issued a temporary authorization to begin operations, and on September 24, 2002, transmitted a final approval, with conditions, of the Class 2 modification. DOE and Sandia are now operating the LTTD unit under the final approval; LTTD operations are expected to be complete by early December. Due to these changes in the permitting authority for the LTTD unit, specific responses to Comments 509 through 524 are unnecessary.</p>
510	<p>LTTD Temporary Authorization Request, April 1998. Demonstrate that the unit is not an incinerator.</p> <p>The LTTD permit application should adequately demonstrate that the proposed LTTD is not an incinerator (does not utilize controlled flame combustion) and therefore is not subject to 20.4.1.500 NMAC incorporating 40 CFR Subpart O.</p>	<p>See response to comment 509.</p>
511	<p>LTTD Temporary Authorization Request, April 1998. Detailed description of the unit.</p> <p>The LTTD permit application should provide a detailed description of the unit in accordance with 20.4.1.900 NMAC incorporating 40 CFR 270.23(a) that includes physical characteristics, materials of construction, and dimensions of the unit as well as detailed plans and engineering reports describing how the unit will be located, designed, constructed, operated, maintained, monitored, inspected, and closed.</p>	<p>See response to comment 509.</p>

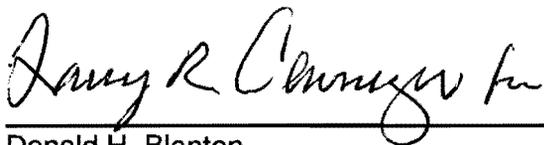
NO	NMED COMMENT	DOE/SNL RESPONSE
512	<p>LTTD Temporary Authorization Request, April 1998. Potential pathways of exposure of humans or environmental receptors.</p> <p>The LTTD permit application should Provide a description of any potential pathways of exposure of humans or environmental receptors to hazardous waste or hazardous constituents and the potential magnitude and nature of such exposures as required by 20.4.1.900 NMAC incorporating 40 CFR 270.23(c).</p>	See response to comment 509.
513	<p>LTTD Temporary Authorization Request, April 1998. Demonstration of effectiveness.</p> <p>The LTTD permit application should provide a demonstration of effectiveness of the treatment based on laboratory or field data as required by 20.4.1.900 NMAC incorporating 40 CFR 270.23(d).</p>	See response to comment 509.
514	<p>LTTD Temporary Authorization Request, April 1998. Prevention of releases to groundwater or the subsurface.</p> <p>The LTTD permit application should demonstrate that appropriate steps will be taken to prevent releases that may have adverse effect on human health or the environment due to migration of waste constituents in the ground water or subsurface environment as required by 20.4.1.500 NMAC incorporating 40 CFR 264.601(a).</p>	See response to comment 509.
515	<p>LTTD Temporary Authorization Request, April 1998. Prevention of releases to surface water or wetlands.</p> <p>The LTTD permit application should demonstrate that appropriate steps will be taken to prevent releases that may have adverse effect on human health or the environment due to migration of waste constituents in surface water, wetlands, or on the soil surface as required by 20.4.1.500 NMAC incorporating 40 CFR 264.601(b).</p>	See response to comment 509.
516	<p>LTTD Temporary Authorization Request, April 1998. Prevention of releases to the air</p> <p>The LTTD permit application should demonstrate that appropriate steps will be taken to prevent releases that may have adverse effect on human health or the environment due to migration of waste constituents in the air as required by 20.4.1.500 NMAC incorporating 40 CFR 264.601(c).</p>	See response to comment 509.
517	<p>LTTD Temporary Authorization Request, April 1998. Monitoring, analysis, inspection, response, reporting, and corrective action.</p> <p>The LTTD permit application should demonstrate that monitoring, analysis, inspection, response, reporting, and corrective action activities will be performed as required by applicable sections of 20.4.1.500 NMAC incorporating 40 CFR 264.601, 40 CFR 264.15, 40 CFR 264.33, 40 CFR 264.75, 40 CFR 264.76, 40 CFR 264.77, and 40 CFR 264.101.</p>	See response to comment 509.

NO	NMED COMMENT	DOE/SNL RESPONSE
518	<p>LTTD Temporary Authorization Request, April 1998. Monitoring, analysis, inspection, response, reporting, and corrective action.</p> <p>The LTTD permit application should demonstrate that monitoring, analysis, inspection, response, reporting, and corrective action activities will be performed as required by applicable sections of 20.4.1.500 NMAC incorporating 40 CFR 264.601, 40 CFR 264.15, 40 CFR 264.33, 40 CFR 264.75, 40 CFR 264.76, 40 CFR 264.77, and 40 CFR 264.101.</p>	See response to comment 509.
519	<p>LTTD Temporary Authorization Request, April 1998. Air emission standards for equipment leaks.</p> <p>The LTTD permit application should demonstrate that requirements for equipment leaks will be managed according to applicable sections of 20.4.1.500 NMAC incorporating 40 CFR Subpart BB. Or, the LTTD permit application should confirm that the LTTD unit is exempt from Subpart BB operational requirements.</p>	See response to comment 509.
520	<p>LTTD Temporary Authorization Request, April 1998. General facility standards.</p> <p>The LTTD permit application should explain how general facility standards will be satisfied as required by 20.4.1.500 NMAC incorporating 40 CFR Subpart B.</p>	See response to comment 509.
521	<p><u>LTTD Temporary Authorization Request, April 1998. Preparedness and prevention.</u></p> <p>The LTTD permit application should explain how preparedness and prevention standards will be satisfied as required by 20.4.1.500 NMAC incorporating 40 CFR Subpart C.</p>	See response to comment 509.
522	<p>LTTD Temporary Authorization Request, April 1998. Contingency plan and emergency procedures.</p> <p>The LTTD permit application should explain how contingency plan and emergency procedure standards will be satisfied as required by 20.4.1.500 NMAC incorporating 40 CFR Subpart D.</p>	See response to comment 509.
523	<p>LTTD Temporary Authorization Request, April 1998. Manifest system, record keeping and reporting.</p> <p>The LTTD permit application should explain how applicable manifest system, record keeping, and reporting requirements will be satisfied as required by 20.4.1.500 NMAC incorporating 40 CFR Subpart E.</p>	See response to comment 509.
524	<p>LTTD Temporary Authorization Request, April 1998. Closure.</p> <p>The LTTD permit application should explain how requirements for closure and post-closure will be satisfied as required by 20.4.1.500 NMAC incorporating 40 CFR Subpart G or 20.4.1.900 NMAC incorporating 40 CFR 270.1.</p>	See response to comment 509.

Response to Comments 509 through 524 in Notice of Deficiency HWB-SNL-02-002 for Sandia National Laboratories, EPA ID #NM5890110518

CERTIFICATION STATEMENT

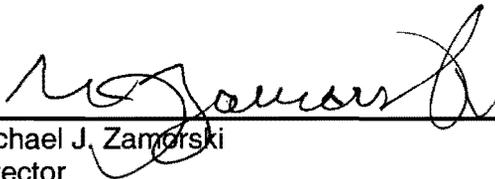
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.



Donald H. Blanton
Vice President, Human Resources and Protection
Services
Sandia Corporation
Albuquerque, New Mexico
Co-Operator

12/21/2002

Date signed



Michael J. Zamorski
Director
U.S. Department of Energy
National Nuclear Security Administration
Sandia Site Office
Owner and Co-Operator

12/5/02

Date signed