CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 20, 2007

Patty Wagner
Manager
Sandia Site Office/NNSA
U.S. Department of Energy
P.O. Box 5400, MS 0184
Albuquerque, NM 87185-5400

Francisco Figueroa
Vice President
Sandia National Laboratories
P.O. Box 5800, MS 0112
Albuquerque, NM 87185-0701

SUBJECT: NOTICE OF PUBLIC COMMENT PERIOD AND OPPORTUNITY TO REQUEST A PUBLIC HEARING ON A DRAFT OPERATING PERMIT FOR SANDIA NATIONAL LABORATORIES, NEW MEXICO
EPA ID NUMBER: NM5890110518

Dear Ms. Wagner and Mr. Figueroa:

Enclosed is a copy of the draft Hazardous Waste Facility Permit, Public Notices and Fact Sheet for the hazardous and mixed waste management units at Sandia National Laboratories (SNL). The draft Permit was prepared by the New Mexico Environment Department (NMED). NMED is providing for a 60-day public comment period and opportunity to request a public hearing. SNL will be notified by certified mail if a public hearing is scheduled. SNL may submit comments on the draft Permit to as provided in the enclosed public notice. The public comment period will end at 5:00 p.m. MST, October 19, 2007.

NMED will give due consideration and the weight it deems appropriate to all comments received during the public comment period. Based on public comment, NMED may make reasonable modifications to the permit, within the framework of the Hazardous Waste Management Regulations, 20.4.1 NMAC. At the time that any final permit decision is made, NMED will issue a response to all comments submitted during the public notice period.
If you have any questions regarding this matter, please contact me at (505) 476-6035.

Sincerely,

John E. Kieling
Program Manager
Permits Management Program
Hazardous Waste Bureau

Enclosures

cc w/attachments:
   T. Fox, NMED OGC
   B. Grantham, NMED OGC
   L. King, EPA Region 6 (6PD-N)

cc w/out attachments:
   J. Bearzi, NMED HWB
   W. Moats, NMED HWB
   C. Armindyas, NMED HWB
   D. Rast, SSO/NNSA, MS 0184
   A. Reiser, SNL, MS 1042

File: SNL 2007 and Reading
August 20, 2007

SUBJECT: NOTICE OF PUBLIC COMMENT PERIOD AND OPPORTUNITY TO REQUEST A PUBLIC HEARING ON A DRAFT A DRAFT HAZARDOUS WASTE PERMIT FOR SANDIA NATIONAL LABORATORIES

Dear Interested Person:

Enclosed is a Public Notice regarding the draft Hazardous Waste Permit for Sandia National Laboratories (SNL). SNL is owned by U.S. Department of Energy (DOE) and is currently co-operated by the DOE and the Sandia Corporation, a subsidiary of Lockheed Martin (collectively, the Applicants). The Applicants requested a permit to perform hazardous and mixed waste treatment and storage activities at SNL. SNL is located within the boundaries of Kirtland Air Force Base south of and adjacent to the city of Albuquerque in Bernalillo County, New Mexico. Sandia Corporation is located at the following address: 1515 Eubank Boulevard SE, Albuquerque, NM 87123. The Sandia Site Office of the U.S. Department of Energy (DOE) is located at KAFB-East at the intersection of Pennsylvania and H Streets, P.O. Box 5400, Albuquerque, NM 87185. The applicant’s primary contact for this action is: David Rast, DOE/NNSA, P.O. Box 5400, Albuquerque, NM 87185.

The enclosed Public Notice provides locations where the Administrative Record, including the Permit Application, draft Permit, Fact Sheet, and supporting documentation, for this action can be reviewed, and provides procedures for submitting comments and requesting a public hearing. Comments and requests for public hearing must be received no later than 5:00 p.m. MST on October 19, 2007.

Any person seeking additional information regarding this notice may contact:

Mr. John E. Kieling, Program Manager
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505

Email: john.kieling@state.nm.us
Telephone: (505) 476-6000
Fax: (505) 476-6030

Sincerely,

John E. Kieling
Program Manager
Permits Management Program
Hazardous Waste Bureau
The New Mexico Environment Department (NMED) proposes to issue a final Hazardous Waste Permit to the United States Department of Energy and Sandia Corporation (the Applicants) for hazardous waste management for treatment and storage at Sandia National Laboratories (SNL, or the Facility).

The Facility generates wastes that are regulated under the federal Resource Conservation and Recovery Act (RCRA), the New Mexico Hazardous Waste Act (HWA), and their implementing regulations. The draft Permit, when finalized would allow the Applicant to: 1) accept, manage, store and treat on-site generated hazardous waste before it is transferred to a permitted treatment or disposal facility (these units include: the Hazardous Waste Management Unit used for storage of hazardous waste; the Thermal Treatment Unit used for treatment of reactive hazardous wastes generated by research operations; the Radioactive and Mixed Waste Management Unit used for storage, treatment, and packaging of mixed wastes; five Manzano Storage Bunkers used for storage of mixed wastes; the Auxiliary Hot Cell Unit used for treatment, packaging, and storage of mixed wastes; and the Corrective Action Management Unit (CAMU), used for the containment of remediation wastes generated during environmental cleanup activities at the nearby closed Chemical Waste Landfill); 2) conduct corrective action activities not covered by the April 29, 2004 Compliance Order on Consent (Consent Order), in response to new releases from permitted units and for solid waste management units (SWMUs) and areas of concern (AOCs) where controls, including monitoring are implemented or releases discovered after the termination of the Consent Order; and 3) conduct tasks in accordance with schedules of compliance, pursuant to the Hazardous Waste Act (Chapter 74, Article 4 NMSA 1978) and the New Mexico Hazardous Waste Management Regulations (20A.1 NMAC).

Sandia National Laboratories is located within the boundaries of Kirtland Air Force Base south of and adjacent to Albuquerque in Bernalillo County, New Mexico. It is a multi-purpose engineering and science laboratory owned and operated by the U. S. Department of Energy (DOE) and co-operated by Sandia Corporation, a subsidiary of Lockheed Martin. The Facility
designs non-nuclear components for the nation’s nuclear weapons, designs and tests conventional military weapons, performs a wide variety of energy research and development projects, and works on assignments that respond to national security threats.

Sandia National Laboratories is located at the following address: 1515 Eubank SE, Albuquerque, New Mexico 87123. The Sandia Site Office of the U. S. Department of Energy (DOE)/National Nuclear Security Administration (NNSA) is located at KAFB-East, Pennsylvania and H Street, P.O. Box 5400, Albuquerque, NM 87185. Sandia Corporation is located at 1515 Eubank SE, Albuquerque, New Mexico 87123. The Facility’s primary contact for this action is: Mr. David Rast, DOE/NNSA, P.O. Box 5400, Albuquerque, NM 87185.

NMED announces the availability of the proposed draft Permit for public comment. In addition, NMED will consider any requests for a public hearing and determine whether a public hearing will be held to consider further public comment. NMED also announces the availability of a Fact Sheet providing the basis for NMED’s proposed action on the draft Permit, and the significant factual, legal, and policy questions considered in preparing the draft Permit. The Fact Sheet also explains in detail the corrective action activities that the Applicant must implement and a summary of the basis for permit conditions, including applicable statutory and regulatory support.

PUBLIC REVIEW OF THE DRAFT PERMIT

The Administrative Record for this proposed action consists of the Permit application, the draft Permit, this Public Notice, the Fact Sheet, and supporting documentation. The Administrative Record may be reviewed, with prior appointment, at the following location during the public comment period.

NMED - Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone: (505) 476-6000
Monday – Friday: 8:00 a.m. to 5:00 p.m.
Contact: Pam Allen

In addition, the draft Permit and the Fact Sheet may be reviewed, with prior appointment, at the following location during the public comment period.

NMED - Hazardous Waste Bureau
District 1
5500 San Antonio Avenue, NE
Albuquerque, New Mexico 87109
Phone: (505) 222-9543
Mondays – Fridays from 8:00 a.m. to 5:00 p.m.
Contact: Cornelius Amindyas

A copy of the draft Permit, this Public Notice, and the Fact Sheet, are also available on the NMED website at: www.nmenv.state.nm.us/HWB/snlperm.html under SNL Draft Permit. To obtain a copy of the Administrative Record or a portion thereof, please contact Ms. Pam Allen at
(505) 476-6000, or at address given above. NMED will provide copies, or portions thereof, of the Administrative Record at a cost to the requestor.

NMED issues this public notice on **August 20, 2007**, to announce the beginning of a 60-day comment period that will end at **5:00 p.m. MST, October 19, 2007**. Any person who wishes to comment on the draft Permit or request a public hearing should submit written or electronic mail (e-mail) comment(s) with the commenter's name and address to the respective address below. Only comments and/or requests received before **5:00 p.m. MST on October 19, 2007** will be considered.

John E. Kieling, Program Manager  
Hazardous Waste Bureau - New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
(505) 476-6000  
E-mail: john.kieling@state.nm.us  
Ref: SNL Draft Permit

Written comments must be based on reasonably available information and include, to the extent practicable, all referenced factual materials. Documents in the administrative record need not be re-submitted if expressly referenced by the commenter. Requests for a public hearing shall provide: (1) a clear and concise factual statement of the nature and scope of the interest of the person requesting the hearing; (2) the name and address of all persons whom the requestor represents; (3) a statement of any objections to the draft Permit, including specific references to any conditions being addressed; and (4) a statement of the issues which the commenter proposes to raise for consideration at the hearing. Written comment and requests for Public Hearing must be filed with Mr. John Kieling on or before **5:00 p.m. MST, October 19, 2007**. NMED will provide a thirty (30) day notice of a public hearing, if scheduled.

NMED must ensure that the approved draft Permit is consistent with the New Mexico Hazardous Waste Management Regulations. All written comments submitted will be considered in formulating a final decision and may cause the draft Permit to be modified. The Department will respond in writing to all public comments. This response will specify which provisions, if any, of the draft Permit have been changed in the final decision and the reasons for the changes; and briefly describe and respond to all public comments raised during the public comment period. All persons presenting written comments or who requested notification in writing will be notified of the decision by mail. These responses will also be posted on the Department's website.

After consideration of all the written public comments received, NMED will issue, or modify and issue, the Permit. The Applicants shall be provided by mail a copy of any relevant modified documents and a detailed written statement of reasons for the modifications.

The Secretary of the New Mexico Environment Department will make the final decision publicly available and shall notify the Applicants by certified mail. The Secretary's decision shall constitute a final agency decision and may be appealed as provided by the HWA (Chapter 74, Article 4 NMSA 1978).
ARRANGEMENTS FOR PERSONS WITH DISABILITIES

Persons having a disability and requiring assistance or auxiliary aid to participate in this process should contact Judy Bentley at the New Mexico Environment Department, Human Resources Bureau, P.O. Box 26110, 1190 St. Francis Drive, Santa Fe, New Mexico, 87502, telephone number: (505) 827-9872. TDY users please access her number via the New Mexico Relay Network at 1-800-659-8331.
20 de agosto, 2007

TEMA: AVISO DEL PLAZO PARA COMENTARIOS DEL PÚBLICO Y OPORTUNIDAD A
SOLICITAR AUDIENCIA PÚBLICA SOBRE EL BORRADOR DE UN PERMISO PARA
EL MANEJO DE DESPERDICIOS PELIGROSOS EN LOS LABORATORIOS
NACIONALES DE SANDÍA

Estimada persona interesada:

Anexo a la presente se encuentra un Aviso al Público acerca del borrador del Permiso de Desperdicios Peligrosos para los Laboratorios Nacionales de Sandía (SNL). SNL pertenece al Departamento de Energía de los Estados Unidos (DOE) y es co-operado conjuntamente por el Departamento de Energía de los Estados Unidos (DOE) y la Corporación, un subsidiario de Lockheed Martin. (colectivamente, los Solicitantes). Los Solicitantes pidieron un permiso para llevar a cabo actividades de tratamiento y almacenamiento de desperdicios peligrosos y mixtos en SNL.

SNL se encuentra dentro de los límites de la Base Aérea Kirtland al sur de Albuquerque en el Condado de Bernalillo, Nuevo México. La Corporación Sandía se encuentra en la siguiente dirección: 1515 Eubank SE, Albuquerque, NM, 87123. La Sucursal Sandía del Departamento de Energía de los Estados Unidos (DOE) se encuentra al KAFB-East en la intersección de las Calles Pennsylvania & H Street, Apartado Postal 5400, Albuquerque, NM 87185. El contacto principal para esta acción es: Mr. David Rast, DOE-NNSA, Apartado Postal 5400, Albuquerque, NM 87185.

El Aviso al Público anexo indica los lugares dónde pueden ser repasados el Acta Administrativa incluyendo la Solictud de Permiso, el Permiso en borrador, la Hoja de Datos y la documentación de apoyo así como los procedimientos a seguir para presentar comentarios o pedir una audiencia pública. Los comentarios y solicitudes de audiencia pública deben recibirse a más tardar a las 5 p.m., hora de la montaña, el 19 de octubre, 2007.

Cualquiera que busca información adicional acerca de este aviso debe comunicarse con:

Mr. John E. Kieling, Director del Programa
Departamento del Medio Ambiente de Nuevo México
Oficina de Desperdicios Peligrosos
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505

Correo electrónico (e-mail): john.kieling@state.nm.us
Tel: (505) 476-6000
Fax: (505) 476-6030

Atentamente,

John E. Kieling
Director del Programa
Programa de Administración de Permisos
Oficina de Desperdicios Peligrosos
Hazardous Waste Bureau
AVISO AL PÚBLICO Nro. 07-10

DEPARTAMENTO DEL MEDIO AMBIENTE DE NUEVO MÉXICO
OFICINA DE DESPERDICIOS PELIGROSOS
SANTA FE, NUEVO MÉXICO 87105
20 de agosto, 2007

AVISO DEL PLAZO PARA COMENTARIOS DEL PÚBLICO Y OPORTUNIDAD A
SOLICITAR AUDIENCIA PÚBLICA SOBRE EL BORRADOR DE UN PERMISO PARA
EL MANEJO DE DESPERDICIOS PELIGROSOS EN LOS LABORATORIOS
NACIONALES DE SANDÍA
NÚMERO DE EPA: NM5890110518

El Departamento del Medio Ambiente de Nuevo México (NMED) propone emitir un Permiso Final para el Manejo de Desperdicios Peligrosos al Departamento de Energía de los Estados Unidos y la Corporación Sandía (los Solicitantes) para el manejo, tratamiento y almacenamiento de desperdicios peligrosos en los Laboratorios Nacionales de Sandía (SNL o la Instalación).

La instalación genera desperdicios regulados bajo el Decreto Federal para la Conservación y Recuperación de Recursos (RCRA), el Decreto de Nuevo México sobre Desperdicios Peligrosos y sus regulaciones de implementación. El Permiso en borrador al finalizarse le permitiría al Solicitante: 1) aceptar, manejar, almacenar y tratar desperdicios peligrosos en su sitio de generación antes de trasladarlos a una instalación que cuenta con el permiso requerido para su tratamiento o disposición. (estas instalaciones incluyen: la Unidad para el Manejo de Desperdicios Peligrosos que se usa para almacenar desperdicios peligrosos; la Unidad para el Tratamientos Térmicos que se usa para el tratamiento de desperdicios peligrosos reactivos generados en operaciones de investigación; la Unidad para el Manejo de Desperdicios Radioactivos y Mixtos que se usa para almacenar, tratar y empaquetar desperdicios mixtos; los cinco Búnkeres de Almacenamiento Manzanos que se usan para almacenar desperdicios mixtos; la Unidad Auxiliar para Células Calientes que se usa para el tratar, empaquetar y almacenar desperdicios mixtos; y la Unidad para el Manejo de Acciones Correctivas (CAMU) que se usa para contener desperdicios que resultan de actividades de remedio emprendidas con fines de limpieza ecológica en el Relleno de Desperdicios Químicos cercano); 2) realizar acciones correctivas no contempladas en el Acuerdo sobre la Orden de Consentimiento (Orden de Consentimiento) del 29 de abril 2004 debido a nuevas emisiones de unidades autorizadas y para unidades de manejo de desperdicios sólidos (SWMUs) y áreas preocupantes donde los controles, incluyendo el monitoreo ya se han implementado o donde descubrieron emisiones después de vencerse la Orden de Consentimiento; y 3) realizar tareas de acuerdo con los calendarios de cumplimiento elaborados bajo el Decreto Sobre Desperdicios Peligrosos (Capítulo 74, Artículo 4
NMSA 1978) y los Reglamentos para el Manejo de Desperdicios Peligrosos de Nuevo México (20.4.1 NMAC).

SNL se encuentra dentro de los límites de la Base Aérea Kirtland (KAFB) al sur de Albuquerque en el Condado de Bernalillo, Nuevo México. Es un laboratorio de ingeniería y ciencias de usos múltiples que pertenece y es operado conjuntamente por el Departamento de Energía de los Estados Unidos (DOE) y la Corporación, un subsidiario de Lockheed Martin. La Instalación se dedica al diseño de componentes no nucleares de las armas nucleares de la nación, así como los diseños y pruebas de armas militares convencionales, realiza una amplia variedad de proyectos de investigación y desarrollo energéticos y se encarga de tareas iniciadas con el fin de responder a amenazas a la seguridad nacional.

SNL se encuentra en la siguiente dirección: 1515 Eubank SE, Albuquerque, NM, 87123. La Sucursal Sandia del Departamento de Energía de los Estados Unidos (DOE)/ Dirección Nacional de Seguridad Nuclear (NNSA), KAFB-East, Pennsylvania & H Street, Apartado Postal 5400, Albuquerque, NM 87185. La Corporación Sandia se encuentra en el Apartado Postal 5800, Manejo de Desperdicios, Albuquerque, NM 87185-5800. El contacto principal para esta acción es: Mr. David Rast, DOE-NNSA, Apartado Postal 5400, Albuquerque, NM 87185.

NMED anuncia la disponibilidad del borrador propuesto del Permiso para los comentarios del público. Además, NMED considerará cualquier solicitud para una audiencia pública y determinará si se debe realizar una audiencia pública para darle una consideración adicional a los comentarios del público. NMED también anuncia la disponibilidad de una Hoja de Datos que explica la base que fundamenta la acción propuesta por NMED en el borrador del Permiso y los factores físicos, jurídicos y de política que se tomaron en cuenta al preparar el borrador del Permiso. La Hoja de Datos también explica detalladamente las acciones correctivas que debe llevar a cabo el Solicitante y resume las justificaciones para las condiciones que impone el Permiso, incluyendo los apoyos estatutarios y reglamentarios.

**REPASO DEL PERMISO EN BORRADOR POR EL PÚBLICO**


NMED - Oficina de Desperdicios Peligrosos  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
Tel: (505) 476-6000  
Lunes a viernes: 8:00 a.m. a 5:00 p.m.  
Contacto: Pam Allen
Además, el Permiso en borrador y la Hoja de Datos pueden ser repasado con cita previa en el siguiente lugar durante el plazo para comentarios del público.

NMED - Oficina de Desperdicios Peligrosos
Districto 1
5500 San Antonio Avenue, NE
Albuquerque, New Mexico 87109
Phone: (505) 222-9543
Lunes a viernes 8:00 a.m. a 5:00 p.m.
Contacto: Cornelius Amindyas

Una copia del Permiso en Borrador y la Hoja de Datos también se encuentran en el sitio de internet de NMED: www.nmenv.state.nm.us/HWB/snlperm.html bajo el título Permiso en Borrador de SNL. Para obtener una copia completa o parcial del Acta Administrativa, favor comunicarse con Ms. Pam Allen al teléfono (505) 476-6000, o en la dirección indicada arriba. NMED proporcionará copias completas o parciales del Acta Administrativa al costo de quién la pide.

NMED emite este aviso al público el día 20 de agosto, 2007, con el fin de anunciar el comienzo del plazo de 60 días para comentarios del público el cual se vencerá a las 5 p.m., hora de la montaña, el 19 de octubre, 2007. Cualquiera que desea comentar sobre el Permiso en borrador o pedir una audiencia pública debe presentar por escrito o por correo electrónico (e-mail) sus comentarios y/o solicitud junto con el nombre y dirección de la persona que comenta a la dirección que se da a continuación. Únicamente los comentarios y/o solicitudes recibidos antes de las 5 p.m., hora de la montaña, el 19 de octubre, 2007, serán considerados.

Los comentarios escritos deben fundamentarse en información razonablemente disponible, incluyendo, al grado que sea factible, los materiales correspondientes a cualquier hecho al cual se hace referencia. No hay necesidad de volver a presentar documentos del Acta Administrativa siempre que se incluya una referencia específica en el comentario. Las solicitudes de audiencia pública deben incluir: 1) una declaración escueta, clara y fundamentada con hechos que explica la naturaleza y alcance del interés que tienen la persona que solicita la audiencia; 2) nombres y direcciones de todas las personas representadas por el solicitante; 3) una declaración que explica cualquier objeción que tiene en cuanto al Permiso en borrador con referencias específicas a cualquier condición del Permiso que se aborda; y 4) una declaración indicando cuantas cuestiones propone el comentarista ventilar en la audiencia. Se debe presentar los comentarios escritos así como las solicitudes para Audiencias Públicas al sr. John Kieling a más tardar la las 5 p.m., hora de la montaña el día 19 de noviembre, 2007. En caso de celebrar una audiencia pública,
será anunciada por NMED con treinta (30) días de anticipación.

NMED debe asegurar que la versión aprobada del Permiso en borrador sea consistente con los Reglamentos para el Manejo de Desperdicios Peligrosos de Nuevo México. Todos los comentarios escritos que se presentan sobre el Permiso en borrador serán considerados al formular una decisión final y podrían resultar en modificaciones al Permiso en borrador. El Departamento responderá por escrito a todos los comentarios del público. En caso de cambios, si los hay, al Permiso en borrador, la respuesta especificará cuáles disposiciones fueron alteradas en la decisión final sobre el Permiso y porque; y ofrecerá una descripción breve y una respuesta a todos los comentarios del público que surgen durante el plazo para comentarios del público. Todos los que presentan comentarios escritos o que piden recibir aviso serán avisados de la decisión por correo. Estas respuestas también aparecerán en el sitio de internet del Departamento.

Después de considerar todos los comentarios recibidos del público, NMED expedirá, o modificará y expedirá el Permiso. Los Solicitantes recibirán por correo una copia de cualquier documento atinente que haya sido modificado con una declaración escrita especificando las razones para las modificaciones.

El Secretario del Departamento del Medio Ambiente de Nuevo México pondrá a la disposición del público su decisión final sobre el Permiso y avisará a los solicitantes por correo certificado. La Decisión del Secretario será la decisión final de la agencia y puede ser apelada de acuerdo con las disposiciones del el Decreto de Ley sobre Desperdicios Peligrosos (Capítulo 74, Artículo 4 NMSA 1978).

ARREGLOS PARA FACILITAR LA PARTICIPACIÓN DE DESCAPACITADOS

Cualquier persona descapacitada y en necesidad de ayuda o auxilio para participar en este proceso debe comunicarse con Judy Bentley al Departamento del Medio Ambiente de Nuevo México, Oficina de Recursos Humanos, P.O. Box 26110, 1190 St. Francis Drive, Santa Fe, New Mexico 87502, teléfono (505)-827-9872. Los usuarios de equipos TTY servíanse acceder su número mediante la Red de Relevo de Nuevo México al 1-800-659-8331.
INTENT TO ISSUE A HAZARDOUS WASTE FACILITY OPERATING PERMIT UNDER THE NEW MEXICO HAZARDOUS WASTE ACT TO THE U. S. DEPARTMENT OF ENERGY AND SANDIA CORPORATION, BERNALILLO COUNTY, NEW MEXICO

Facility Name: Sandia National Laboratories

EPA ID Number: NM5890110518

Type of Facility: Sandia National Laboratories (SNL; the Facility) is a multi-purpose engineering and science laboratory owned by the U. S. Department of Energy (DOE) and is co-operated by the DOE and Sandia Corporation (a subsidiary of Lockheed Martin, Incorporated). DOE and Sandia Corporation are the Applicants for the draft permit which is the subject of this Fact Sheet. SNL personnel design and test non-nuclear components and safety and security systems for the nation’s nuclear weapons, design and test conventional weapon systems, perform a wide variety of energy research and development projects, and work on assignments that respond to national security threats.

The Facility generates wastes that are regulated under the U. S. Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act (HWA) (as amended, NMSA 1978, §§ 74-4-1 to 74-4-14) and its implementing regulations, specifically New Mexico Administrative Code (NMAC) Title 20, Chapter 4. In the draft Permit, these wastes are referred to as hazardous and mixed wastes (mixed wastes contain both radiological and hazardous components). The hazardous and mixed wastes are generated during Facility operations and as a result of conducting corrective action (including cleanups) at solid waste management units (SWMUs) and areas of concern (AOCs). With but few exceptions, corrective actions are currently conducted by the Applicants pursuant to an enforceable Consent Order between the New Mexico Environment Department (NMED), DOE and Sandia Corporation, dated April 29, 2004.
The NMED intends to issue a final Permit, after considering public comment, to the Applicants pursuant to Section 74-4-4.2 of the HWA. The Applicants currently are the owner/operators of 11 hazardous waste treatment, storage, and disposal units located at the Facility. Of these 11 units, three are currently operating under existing RCRA permits, one unit is being permitted separately for post-closure care, and seven are currently operating under interim status (non-permitted) conditions. The final Permit, when issued, will authorize the Applicants to continue to store and treat hazardous and mixed waste generated off-site and on-site at the ten hazardous waste management units covered under the permit. The final Permit will establish the general and specific standards for these activities pursuant to the HWA and the New Mexico Hazardous Waste Management Regulations (HWMR), 20.4.1 NMAC.

Location: SNL, including various SWMUs and AOCs, is located on land owned by the DOE, the U.S. Department of Defense (Kirtland Air Force Base or KAFB), and the U. S. Forest Service in Bernalillo County, New Mexico. Collectively, these lands are situated south of Albuquerque in north-central New Mexico. The Facility is composed of five Technical Areas (TAs) and several large remote test areas (Foothills Test Area, Central Coyote Test Area, Southwest Test Area, and Canyons Test Area). Within KAFB, the Facility occupies 2,820 acres (4.4 square miles). SWMUs and AOCs are listed in Part 6 of the draft Permit and are scattered across DOE, KAFB, and U. S. Forest Service Lands.

Owner: DOE

Operators: DOE and Sandia Corporation

INTRODUCTION

The DOE and Sandia Corporation, as the owner and operators of the hazardous waste management units, are required to obtain a permit from NMED to conduct hazardous and mixed waste treatment and storage for greater than 90 days, pursuant to the HWA and RCRA. Prior to issuing a final permit, NMED is required to release a draft permit for public comment pursuant to 20.4.1.901.A (3) NMAC. This Fact Sheet is intended to facilitate public review of the draft Permit.

The Facility’s hazardous waste management units include: 1) the Hazardous Waste Management Unit (HWMU), which is used for the storage and packaging of hazardous wastes; 2) the Thermal Treatment Unit (TTU) used for the treatment of reactive (explosive) wastes generated by research operations conducted at one location at SNL; 3) the Radioactive and Mixed Waste Management Unit (RMWMU) used for the storage, treatment, and packaging of mixed wastes; 4) five Manzano Storage Bunkers (MSB) used for the storage of mixed wastes; 5) the Auxiliary Hot Cell Unit (AHCU) used for the treatment, packaging, and storage of mixed wastes; and 6) a
Corrective Action Management Unit (CAMU) which is used for containerizing remediation hazardous wastes generated as a result of closure activities conducted at the Chemical Waste Landfill (CWL).

**REGULATORY BACKGROUND**

Subtitle C of RCRA provides “cradle to grave” environmental regulation of the management of hazardous waste at hazardous waste treatment, storage, and disposal facilities. The United States Environmental Protection Agency (EPA) has authorized the State of New Mexico to implement and enforce Subtitle C requirements, including corrective action requirements, under its own hazardous waste management program. The State’s enabling authority for the program is the HWA, which authorizes the State’s Environmental Improvement Board (EIB) to adopt hazardous waste management regulations and authorizes NMED to implement and enforce the provisions of the HWA and the HWMR.

As part of the State’s program, the EIB has adopted regulations relating to, among other things, the issuance of hazardous waste permits. These regulations incorporate by reference pertinent sections of the Code of Federal Regulations – 40 C.F.R. Parts 260 through 270, 273, and 280 – and are codified in the HWMR, 20.4.1 NMAC.

The HWA and HWMR require each person owning or operating an existing facility or planning to construct a new facility for the treatment, storage, or disposal of hazardous waste to have a permit. See 42 U.S.C. 6925 and 40 C.F.R. § 270.1. However, a treatment, storage or disposal facility in existence on or before November 19, 1980 is eligible for “interim status.” As mentioned previously in this Fact Sheet, several of the hazardous waste management units are currently operating under interim status (the RMWMU, AHCU, and five MSB). Interim status authorizes an existing facility to operate, subject to the interim status standards set forth in 40 C.F.R. Part 265, until NMED issues or denies a RCRA permit or until interim status is otherwise terminated.

The HWA and HWMR further require corrective action for all releases of hazardous waste or hazardous constituents from any SWMU at a facility seeking a permit, regardless of the time at which waste was placed in such a unit. [42 U.S.C. 6924(u), Section 74-4-4.2(B), NMSA 1978, and 40 C.F.R. § 264.101(a)]. Corrective action is also required beyond the facility boundary. [42 U.S.C. 6924(v) and 40 C.F.R. § 264.101(c)].

**PROCEDURAL BACKGROUND FOR THE SNL PERMIT APPLICATION**

**General Permit Application Requirements:** Owners or operators of hazardous waste management facilities, including interim status facilities, are required to submit a comprehensive permit application covering all aspects of design, operation, maintenance, and closure of their facilities. The Permit Application consists of Parts A and B. Part A of the Permit Application (Part A Application) is a relatively short, standard form that summarizes general information about a facility including the name of the owner/operator, a list of the types and estimated quantities of wastes managed, a facility layout diagram, and the hazardous waste management
activities requiring a permit. Part B of the Permit Application (Part B Application) is an extensive document submitted in a narrative, tabular, and schematic format that describes the facility operations in detail and includes information necessary to establish corrective action requirements for releases from SWMUs and AOCs.

**Part A Permit Application:** On February 6, 2002, the Applicants submitted, in a timely manner, to NMED its Part A Permit Application for renewal of its current operating Permits. Additionally, seven units that are currently being operated under interim status were included in the Part A. The Part A Permit Application contains information on the ten hazardous waste treatment and storage units listed on page 2 of this Fact Sheet.

**Part B Permit Application:** On February 6, 2002, the Applicants submitted, in a timely manner, its Part B Permit Application (along with its Part A) for renewal of its current operating treatment and storage Permit; and for conducting corrective action at the Facility’s SWMUs and AOCs. Information on the seven operating interim status units is also included in the Part B Permit Application.

The eleventh interim status unit at the Facility, the CWL, will receive a separate permit for post-closure care. This Fact Sheet does not address the draft Permit for the CWL which was released for public comment on May 21, 2007.

**TYPE AND QUANTITY OF WASTES**

**Type of Wastes:** The following hazardous (and mixed) wastes are managed at the Facility’s treatment and storage units:

Hazardous wastes exhibiting the characteristics of ignitability, corrosivity, and reactivity include: D001, D002, and D003.

Hazardous wastes exhibiting the characteristics of toxicity include: D004, D005, D006, D007, D008, D009, D010, D011, D012, D013, D014, D015, D016, D017, D018, D019, D020, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, and D043.

Hazardous wastes from non-specific sources include: F001, and F002 (spent halogenated solvents), F003, F004, and F005 (spent non-halogenated solvents); F006 (wastewater treatment sludges from electroplating operations); F007, F008, F009, F010, F011, F012, F019, F020, F021, F022, F023, F024, F025, F026, F027, F028, F032, F034, F035, F037, F038, and F039 (liquid leachates that have percolated through land disposed wastes). Discarded commercial chemical products, off-specification species, container residues, and spill residues, and acute hazardous wastes from commercial chemical products include: P001 through P018, P020 through P024, P026 through P031, P033, P034, P036 through P051, P054, P056 through P060, P062 through P078, P081 through P085, P087 through P089, P092 through P099, P101 through P106, P108 through P116, P118 through P123, P127, P128, P185, P188 through P192, P194, P196 through P199, and P201 through P205.
Toxic hazardous wastes from commercial chemical products include: U001 through U012, U014 through U039, U041 through U053, U055 through U064, U066 through U099, U101, U102, U105, U106 through U138, U140 through U174, U176 through U194, U196, U197, U200 through U211, U213 through U223, U225 through U228, U234 through U240, U243, U244, U246 through U249, U271, U278. U279, U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, and U409 through U411.

The “D,” “F,” “P,” and “U” EPA Hazardous Waste Numbers listed above are assigned to specific hazardous wastes that are specified at 20.41.200 NMAC, incorporating 40 C.F.R Part 261 Subparts C and D.

Quantity of Wastes: The quantities described below include both liquid and solid hazardous and mixed wastes, including those with volumes noted in gallons.

a) Treatment: The draft Permit proposes to allow the Applicants to treat a maximum of approximately 1200 gallons per year of reactive waste at the TTU; approximately 4,100 pounds and 15,000 gallons of mixed waste at the RMWMU by chemical deactivation, macroencapsulation, stabilization, thermal deactivation, and amalgamation; about 10,000 gallons of mixed waste per year at the AHCU by chemical deactivation, macroencapsulation and stabilization; and approximately 4,000 lbs per year at the AHCU (by physical treatment).

b) Storage: The draft Permit proposes to allow the Applicants to store a maximum of approximately 19,386 gallons of hazardous waste at the HWMU per year; approximately 52,388 gallons of mixed waste at the RMWMU; approximately 589 gallons of mixed waste at the AHCU; and a total of 28,930 gallons of mixed waste at the MSB (6,270 gallons of mixed waste in Bunker 37034; 8,800 gallons of waste in Bunker 37118; and 4,620 gallons in each of Bunkers 37045, 37055, and 37057, respectively).

c) Post-Closure Care: The Applicants are required to conduct post-closure care of the CAMU, which contains 31,800 cubic yards of hazardous remediation waste (which is mostly contaminated soil).

TYPE OF UNITS TO BE PERMITTED

1. Hazardous Waste Management Unit

The HWMU consists of several hazardous waste management areas within 1.35 acres of fenced property between TA-I and TA-II. The existing hazardous waste operating permit for the HWMU was issued in August 1992 and expired on August 6, 2002. Operations at the HWMU include storage and packaging of hazardous wastes in containers and repackaging wastes into suitable containers for shipment to off-site RCRA-permitted treatment, storage or disposal facilities. A more detailed account on the operation of the HWMU can be found in Attachment 3 of the draft Permit.
Building 958

The Hazardous Waste Storage Building (Building 958) is a precast concrete building that contains eight separate and recessed waste storage compartments (cells) for segregation of waste. Containers with liquids are placed on metal grating over a secondary containment area. Containers with solids are placed on pallets.

Modular Buildings 958b and 958c

The modular storage buildings (Buildings 958b and 958c) are located west of Building 958 and are used for storage of ignitable and reactive wastes, including but not limited to, lithium batteries, gas cylinders, and flammable solids. The exterior dimensions of each modular storage building are 22-feet long, 8-feet wide, and 8-feet high. The buildings are constructed of welded steel.

Covered Open Storage Area for Nonhazardous Waste and Supplies

A covered, open, bermed, concrete-line area used for the storage of waste oils (prior to offsite recycling) and waste packaging supplies is located in the northeast corner of the HWMU. Storage of used oil is subject to compliance with 40 C.F.R. Part 279.

Building 959

The Hazardous Waste Packaging Building (Building 959) is the easternmost hazardous waste management area and is a pre-cast concrete building. In the Hazardous Waste Packaging Building, lab packs are prepared by placing small containers of hazardous waste into larger containers filled with absorbent material. Wastes are stored and prepared for shipment to off-site treatment and disposal facilities. Eight waste-holding cells and a waste packaging area are located in the building.

All of the cells and the packaging area have recessed floors that are constructed of reinforced concrete and are covered with metal grating. Waste containers are placed on shelves over the metal grating. The recessed areas in each holding cell provide secondary containment.

2. Thermal Treatment Unit

The TTU was originally permitted in November of 1994. It is primarily located outside Building 6715 in TA-III and occupies 196 square feet south of the building. The TTU consists of a burn cage with ancillary equipment and is used for thermal treatment (open burning) of reactive (D003) wastes. An 8-feet high earthen berm and a fence surround the treatment unit.

The treatment area consists of a square burn pan constructed of steel, 2 feet 6 inches on a side and 6 inches deep. The burn pan is located near the center of a square curbed slab of concrete. An enclosure on the east side of the cage houses three propane burners which supply the heat needed to treat the reactive wastes placed into the burn pan. Treatment residuals from the TTU
are transported to off-site permitted facilities for disposal. A more detailed account on the operation of the TTU can be found in Attachment 4 of the draft Permit.

3. Radioactive and Mixed Waste Management Unit

The RMWMU consists of several buildings within a fenced area located at the southeastern corner of TA-3. It has six designated waste management areas. These include Buildings 6920, 6921, 6925, and 6926; two modular storage buildings; and the outdoor waste storage area. The RMWMU is used for storage, treatment, and packaging of mixed wastes and radioactive wastes. Mixed wastes and treated residues are transported from the RMWMU to off-site permitted facilities for treatment, storage, or disposal. The RMWMU is currently operating under interim status. A more detailed account on the operation of the RMWMU can be found in Attachment 5 of the draft Permit.

In each RMWMU waste management area, containers holding liquid mixed wastes are to be stored on portable spill pallets or pans. The following sections provide descriptions of each of the waste management areas at the RMWMU.

Building 6920

The waste management areas in Building 6920 include waste staging, storage, and waste treatment areas. Building 6920 is a single-story concrete and steel structure with a total waste management area of approximately 5,000 square feet. The floors are concrete and are sloped to catch basins with no outlets.

Building 6920 consists of two bays (north and south) isolated from each other by an interior airlock at the west end of the building. Waste treatment is performed in certain portions of Building 6920. Containers of liquid mixed wastes are stored over or near the sumps in the south bay. In the north bay and other areas of Building 6920, containers of liquid wastes are stored on portable spill pallets and pans covered with grating.

Building 6921

Building 6921 is a single-story concrete structure located east of Building 6920. The total waste management area is approximately 1,450 square feet.

Buildings 6925 and 6926

Buildings 6925 and 6926 are used for storage and treatment of mixed waste. Building 6925 has a total storage area of approximately 4,000 square feet; Building 6926 has a total storage area of approximately 4,000 square feet. Each building is prefabricated steel erected on a concrete slab floor and foundation.
Modular Storage Buildings

There are two modular storage buildings located west of Building 6920 that are used for storage of reactive, ignitable, and flammable wastes. The exterior dimensions of each modular storage building are 22.6 feet long, 9 feet wide and 8.6 feet high.

Outdoor Waste Storage Area

The outdoor waste storage area consists of the asphalt paved areas to the north, east, and west of Building 6920 and within the RMWMU fence. The outdoor waste storage area will be used for containerized waste storage. It has an area of approximately 48,500 square feet. The area is curbed and paved, and it slopes toward a water retention pond. Containers of mixed waste will be stored inside transportainers.

4. Auxiliary Hot Cell Unit

The AHCU is located in Building 6597 at TA-5. It is a concrete and steel structure, with concrete masonry unit walls and a concrete floor. The AHCU is currently operated under interim status for treatment, packaging, and storage of mixed wastes. The AHCU will also be used to manage wastes that do not meet the waste acceptance criteria for the RMWMU and wastes that are subject to the Federal Facilities Compliance Order (FFCO) between the NMED, DOE, and Sandia Corporation. A more detailed account on the operation of the AHCU can be found in Attachment 6 of the draft Permit.

5. Manzano Storage Bunkers

The five Manzano Storage Bunkers (MSB) are currently operated under interim status. These include Bunkers 37034, 37045, 37055, 37057, and 37118. The Bunkers are used for storage of mixed wastes. The five MSB are located within the former Manzano Base in the eastern part of KAFB. Mixed wastes will be transported from the MSB to other Facility Units for storage or treatment before being transported to permitted off-site facilities for any necessary further treatment and for disposal. A more detailed account on the operation of the MSB can be found in Attachment 7 of the draft Permit.

6. Corrective Action Management Unit

The CAMU is a 1.9-acre site located in the southeastern corner of TA-3, northwest of the Chemical Waste Landfill (CWL) and north of the RMWMU. The CAMU is used for the containment of hazardous remediation wastes generated as a result of excavating the CWL. The 5-year authorization to operate the CAMU was issued by the EPA on September 25, 1997 and expired on September 20, 2002. The CAMU was closed May 10, 2004 and is currently subject to the regulatory requirements for post-closure care. A more detailed account on the operation of the CAMU can be found in Attachment 16 of the draft Permit.
The CAMU containment cell was closed with waste remaining in place. The containment cell and supporting infrastructure are subject to the post-closure requirements at 20.4.1.500 NMAC incorporating 40 C.F.R. §§ 264.117 through 264.120 and 264.552(e)(6). The containment cell includes an engineered liner and final cover systems that are designed to minimize the migration of hazardous waste and constituents into the environment. In addition to the cell liner and final cover systems, the containment cell incorporates a vadose zone monitoring system and a leachate collection and removal system.

DESCRIPTION OF THE PERMIT

The draft Permit is organized into seven (7) Permit Parts and sixteen (16) Permit Attachments. The draft Permit generally follows the format, style, and general conditions in EPA permitting guidance, including, but not limited to: Model RCRA Permit For Hazardous Waste Management Facilities (Draft), U.S. EPA (September, 1988); Model Permit For Hazardous and Solid Waste Amendments (Draft), U.S. EPA (July, 1995, 1998); and RCRA Guidance Manual for Subpart G Closure and Post-Closure Care Standards and Subpart H Cost Estimating Requirements, OSWER 9476.00-5 (January, 1987). Due to conditions at SNL, NMED proposes to impose, in addition to general permit conditions, several permit conditions that are necessary to protect human health and the environment pursuant to NMED’s “omnibus authority” [see 20.4.1.900 NMAC incorporating 40 C.F.R. § 270.32(b)(2)].

Each Permit Part of the draft Permit is briefly described below and certain permit conditions are noted. The general regulatory authority for conditions in each Section is noted, more specific citations are provided throughout the draft Permit at the end of each condition.

Permit Part 1: General Permit Conditions contains permit conditions that apply to all hazardous waste management permits, most of which are based upon mandatory permit conditions set forth at 20.4.1.500 NMAC, incorporating 40 C.F.R. Part 264, and 20.4.1.900 NMAC, incorporating 40 C.F.R. Part 270.

Permit Part 2: General Facility Conditions contains mandatory permit conditions for operation of hazardous waste management facilities set forth at 20.4.1.500 NMAC, incorporating 40 C.F.R. Part 264, Subparts B through E. Permit Part 2 references Permit Attachments that provide more information regarding SNL, namely Permit Attachment 1 (General Facility Information), Permit Attachment 2 (Facility-Wide Design and Operation of the Treatment and Storage Units), Permit Attachment 3, (The Hazardous Waste Management Unit), Permit Attachment 4 (The Thermal Treatment Unit), Permit Attachment 5 (The Radioactive and Mixed Waste Management Unit), Permit Attachment 6 (The Auxiliary Hot Cell Unit), Permit Attachment 7 (The Manzano Storage Bunkers), Permit Attachment 8 (Authorized Wastes), Permit Attachment 9 (Waste Analysis Plan), Permit Attachment 10 (Security Plan), Permit Attachment 11 (Inspection Plan), Permit Attachment 12 (Contingency Plan), Permit Attachment 13 (Recordkeeping), Permit Attachment 14 (Personnel Training), Permit Attachment 15 (Closure Plan), and Permit Attachment 16 (Post-Closure Care Plan for the Corrective Action Management Unit).
Permit Part 3: Storage of Hazardous Waste in Containers contains the regulatory requirements that the Applicants shall follow when managing and storing hazardous wastes at the Hazardous Waste Management Unit, the Radioactive and Mixed Waste Management Unit, the Auxiliary Hot Cell Unit, and the five Manzano Storage Bunkers. The Applicants are authorized to manage, treat and store at the storage units only those hazardous and mixed wastes listed in Permit Attachment 8 (Authorized Wastes). General descriptions of the storage units and their locations are provided in Permit Attachment 1. Specific Unit Design and Operation, including process information for the management, storage and transfer of hazardous and mixed waste can be found in Permit Attachments 1 through 7. The waste stream and the Waste Analysis Plan are described in Permit Attachment 9 (Waste Analysis Plan). The Applicants would be authorized to store only the amounts shown in the second column of Table 1 at the locations described in the first column.

<table>
<thead>
<tr>
<th>Permitted Storage Unit/Waste Management Area</th>
<th>Maximum Amount of Waste (Gallons)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Hazardous Waste Management Unit (HWMU)</strong></td>
<td></td>
</tr>
<tr>
<td>Building 958</td>
<td>14,988</td>
</tr>
<tr>
<td>Building 958C (Modular Storage Building)</td>
<td>1,250</td>
</tr>
<tr>
<td>Building 958C (Modular Storage Building)</td>
<td>1,250</td>
</tr>
<tr>
<td>Building 959</td>
<td>1,898</td>
</tr>
<tr>
<td><strong>Radioactive and Mixed Waste Management Unit (RMWMU)</strong></td>
<td></td>
</tr>
<tr>
<td>Building 6920</td>
<td>3,355</td>
</tr>
<tr>
<td>Building 6921</td>
<td>1,953</td>
</tr>
<tr>
<td>Building 6925</td>
<td>20,790</td>
</tr>
<tr>
<td>Building 6926</td>
<td>20,790</td>
</tr>
<tr>
<td>Modular Storage Building TP150</td>
<td>275</td>
</tr>
<tr>
<td>Modular Storage Building TP153</td>
<td>275</td>
</tr>
<tr>
<td>Asphalt Area North, East, and West of Building 6920</td>
<td>4,950</td>
</tr>
<tr>
<td><strong>Auxiliary Hot Cell Unit (AHCU)</strong></td>
<td></td>
</tr>
<tr>
<td>Building 6597</td>
<td>225</td>
</tr>
<tr>
<td>Building 6597 Storage Silos</td>
<td>364</td>
</tr>
<tr>
<td><strong>Manzano Storage Bunkers (MSB)</strong></td>
<td></td>
</tr>
<tr>
<td>Bunker 37034</td>
<td>6,270</td>
</tr>
<tr>
<td>Bunker 37045</td>
<td>4,620</td>
</tr>
<tr>
<td>Bunker 37055</td>
<td>4,620</td>
</tr>
<tr>
<td>Bunker 37057</td>
<td>4,620</td>
</tr>
<tr>
<td>Bunker 37118</td>
<td>8,800</td>
</tr>
</tbody>
</table>

Permit Part 4: Treatment of Hazardous wastes contains the requirements for treatment of mixed wastes at the RMWMU, the AHCU, and the treatment of reactive hazardous wastes at the TTU. Also presented is information on the description and dimensions of each container treatment area, the maximum amount and types of wastes that may be managed by the Applicants, a description of the types of containers used, the capacities of primary and secondary
containment systems, and the specific features associated with each waste treatment activity. Once the permit is issued, the Applicants could treat at the treatment units by the treatment type only the amounts shown in Table 2 below.

<table>
<thead>
<tr>
<th>Treatment Type</th>
<th>Waste Types</th>
<th>Maximum Amount of Waste Per Treatment Event</th>
<th>Maximum Amount of Waste to be Treated Annually</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>THERMAL TREATMENT UNIT (TTU)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Open Burning</td>
<td>Reactive wastes</td>
<td>20.8 gallons per burn event</td>
<td>1,200 gallons /Year</td>
</tr>
<tr>
<td><strong>RADIOACTIVE AND MIXED WASTE MANAGEMENT UNIT (RMWMU) -- Buildings 6920 and 6921</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chemical deactivation</td>
<td>Ignitable, Reactive and Corrosive Wastes</td>
<td>65 Gallons/day</td>
<td>3,000 Gallons/Year</td>
</tr>
<tr>
<td>Macro-encapsulation</td>
<td>Hazardous Debris: Wastes with Toxic Metals (excluding Mercury)</td>
<td>165 Gallons/day</td>
<td>6,000 Gallons/Year</td>
</tr>
<tr>
<td>Stabilization</td>
<td>Ignitable, Reactive and Corrosive Liquid Wastes</td>
<td>550 Gallons/day</td>
<td>6,000 Gallons/Year</td>
</tr>
<tr>
<td>Thermal deactivation</td>
<td>Ignitable, Reactive and Corrosive Wastes</td>
<td>550 Gallons/day</td>
<td>150 Gallons/Year</td>
</tr>
<tr>
<td>Amalgamation</td>
<td>Elemental Mercury</td>
<td>10 Pounds/hour</td>
<td>100 Pounds/Year</td>
</tr>
<tr>
<td>Physical Treatment/Mechanical Processing</td>
<td>Example: Puncturing Aerosol Cans</td>
<td>20 Pounds/hour</td>
<td>4,000 Pounds/Year</td>
</tr>
<tr>
<td><strong>AUXILIARY HOT CELL UNIT (AHCU) -- Building 6597</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chemical deactivation</td>
<td>Ignitable, Reactive and Corrosive Wastes</td>
<td>55 gallons/day</td>
<td>2,000 Gallons/Year</td>
</tr>
<tr>
<td>Macro-encapsulation</td>
<td>Hazardous Debris: Wastes with Toxic Metals (excluding Mercury)</td>
<td>55 gallons/day</td>
<td>6,000 Gallons/Year</td>
</tr>
<tr>
<td>Stabilization</td>
<td>Ignitable, Reactive and Corrosive Liquid Wastes</td>
<td>55 gallons/day</td>
<td>2,000 Gallons/Year</td>
</tr>
<tr>
<td>Physical Treatment/Mechanical Processing</td>
<td>Example: Aerosol Cans</td>
<td>20 pounds /hour</td>
<td>4,000 Pounds/Year</td>
</tr>
</tbody>
</table>

**Permit Part 5: Organic Air Emissions Requirements** applies to the Facility permitted units for controlling air emissions. These include containers located at the HWMU, the RMWMU, the AHCU, and the MSB.
Part 5 of the draft Permit would require the Applicants to characterize hazardous wastes to ensure adherence to applicable air emission requirements in compliance with 20.4.1.500 NMAC incorporating 40 C.F.R Part 264, Subparts AA, BB, and CC. The Applicants store and treat hazardous wastes in containers subject to Subpart CC (i.e., waste contains an average volatile organic concentration of 500 parts per million by weight (ppmw)). Therefore, the Applicants must characterize the volatile organic concentration of hazardous waste managed in containers in accordance with 40 C.F.R. Part 264, Subpart CC.

Permit Part 6: Corrective Action requires the Applicants to implement corrective action as necessary to protect human health and the environment for all releases pursuant to 42 U.S.C. § 6924(u) and (v), 40 C.F.R. § 264.101, Subparts F and S, including: (1) new releases of hazardous waste or hazardous constituents from operating or closed units at the Facility; (2) any releases of hazardous waste or hazardous constituents that occur after the date on which the Consent Order terminates pursuant to Section III.E.2 of the Consent Order; (3) implementation of the controls, including long-term monitoring, for any SWMU on the Permit’s “Corrective Action Complete with Controls” list, which is described in Section III.W.3.b of the Consent Order; and (4) any releases of hazardous waste or hazardous constituents that occur after the date on which the Consent Order terminates pursuant to Section III.E.2 of that document. All other corrective action shall be conducted pursuant to the Consent Order. Corrective Action is required pursuant to the Consent Order for all Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) identified in Table 6-2 of Permit Part 6.

Permit Part 7: Post-Closure Care Requirements for the Corrective Action Management Unit contains the post-closure care requirements of 40 C.F.R. Part 264, Subpart G, for the CAMU. The requirements include information on the types of wastes disposed of in the unit; the length of post-closure care; planned monitoring and maintenance activities; Sampling and Analysis Plan, Personnel Training, Contingency Plan, and other aspects of post-closure care. A more in-depth description of the Post-Closure Care procedures for the CAMU is presented in Permit Attachment 16 of the draft Permit.

PUBLIC REVIEW OF THE DRAFT PERMIT

The Administrative Record for this proposed action consists of the Permit application, the draft Permit, the Public Notice, this Fact Sheet, and supporting documentation. The Administrative Record may be reviewed, with prior appointment, at the following location during the public comment period.

NMED - Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone: (505) 476-6000
Monday – Friday: 8:00 a.m. to 5:00 p.m.
Contact: Pam Allen
In addition, the draft Permit and the Fact Sheet may be reviewed, with prior appointment, at the following location during the public comment period.

NMED - Hazardous Waste Bureau  
District 1  
5500 San Antonio Avenue, NE  
Albuquerque, New Mexico 87109  
Phone: (505) 222-9543  
Mondays - Fridays from 8:00 a.m. to 5:00 p.m.  
Contact: Cornelius Amindyas

A copy of the draft Permit, the Public Notice, and this Fact Sheet, are also available on the NMED website at: www.nmenv.state.nm.us/HWB/snlperm.html under SNL Draft Permit. To obtain a copy of the Administrative Record or a portion thereof, please contact Ms. Pam Allen at (505) 476-6000, or at address given above. NMED will provide copies, or portions thereof, of the Administrative Record at a cost to the requestor.

NMED issues this public notice on August 20, 2007, to announce the beginning of a 60-day comment period that will end at 5:00 p.m. MST, October 19, 2007. Any person who wishes to comment on the draft Permit or request a public hearing should submit written or electronic mail (e-mail) comment(s) with the commenter’s name and address to the respective address below. Only comments and/or requests received before 5:00 p.m. MST on October 19, 2007 will be considered.

John E. Kieling, Program Manager  
Hazardous Waste Bureau - New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
(505) 476-6000  
E-mail: john.kieling@state.nm.us  
Ref: SNL Draft Permit

Written comments must be based on reasonably available information and include, to the extent practicable, all referenced factual materials. Documents in the administrative record need not be re-submitted if expressly referenced by the commenter. Requests for a public hearing shall provide: (1) a clear and concise factual statement of the nature and scope of the interest of the person requesting the hearing; (2) the name and address of all persons whom the requestor represents; (3) a statement of any objections to the draft Permit, including specific references to any conditions being addressed; and (4) a statement of the issues which the commenter proposes to raise for consideration at the hearing. Written comment and requests for Public Hearing must be filed with Mr. John Kieling on or before 5:00 p.m. MST, October 19, 2007. NMED will provide a thirty (30) day notice of a public hearing, if scheduled.

All written comments submitted will be considered in formulating a final decision and may cause the draft Permit to be modified. The Department will respond in writing to all public
comments. This response will specify which provisions, if any, of the draft Permit have been changed in the final decision and the reasons for the changes; and briefly describe and respond to all public comments raised during the public comment period. All persons presenting written comments or who requested notification in writing will be notified of the decision by mail. These responses will also be posted on the Department’s website.

After consideration of all the written public comments received, the Secretary of the New Mexico Environment Department may issue a final Permit. The Secretary will make the final decision publicly available and shall notify the Applicants by certified mail. All persons submitting written public comment, who filed an Entry of Appearance, or requested notification in writing, shall be notified of the decision by first class regular mail. The Secretary’s decision shall constitute a final agency decision and may be appealed as provided by the HWA (Chapter 74, Article 4 NMSA 1978).

ARRANGEMENTS FOR PERSONS WITH DISABILITIES

Persons having a disability and requiring assistance or auxiliary aid to participate in this process should contact Judy Bentley at the New Mexico Environment Department, Human Resources Bureau, P.O. Box 26110, 1190 St. Francis Drive, Santa Fe, New Mexico, 87502, telephone number: (505) 827-9872. TDY users please access her number via the New Mexico Relay Network at 1-800-659-8331.
RESOURCE CONSERVATION AND RECOVERY ACT
DRAFT FACILITY OPERATING PERMIT
EPA ID No. NM5890110518

To The

U.S. DEPARTMENT OF ENERGY/SANDIA CORPORATION

For the

SANDIA NATIONAL LABORATORIES
HAZARDOUS AND MIXED WASTE TREATMENT AND STORAGE UNITS AND POST-CLOSURE CARE OF THE CORRECTIVE ACTION MANAGEMENT UNIT

Located in

BERNALILLO COUNTY, NEW MEXICO

Prepared by the

NEW MEXICO ENVIRONMENT DEPARTMENT
HAZARDOUS WASTE BUREAU
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SANTA FE, NEW MEXICO, 87505

August 20, 2007