



Department of Energy
National Nuclear Security Administration
Sandia Field Office
P. O. Box 5400
Albuquerque, NM 87185

ENTERED



APR 02 2014

RECEIVED

APR 4 2014

NMED
Hazardous Waste Bureau

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

Subject: Supplemental Comments on *Draft Hazardous Waste Permit for Sandia National Laboratories/New Mexico, Environmental Protection Agency Identification Number NM5890110518 and Proposed Granting of Corrective Action Complete Status for 24 Solid Waste Management Units/Areas of Concern at Sandia National Laboratories/New Mexico*

Dear Mr. Kieling:

On behalf of the Department of Energy (DOE) and Sandia Corporation (Sandia), the DOE is submitting the enclosed supplemental comments on the Subject draft Permit.

On November 8, 2012, the DOE and Sandia submitted comments, stated opposition to issuance of the Permit as drafted, and requested a public hearing to address the outstanding issues. The supplemental comments submitted at this time address several additional issues in the draft Permit but do not resolve the outstanding issues that led to DOE/Sandia opposition of the draft Permit. Thus, the DOE and Sandia continue to oppose the issuance of the Permit as drafted. None of the supplemental comments address the proposed granting of corrective action complete status for the 24 Solid Waste Management Units/Areas of Concern. Each comment includes alternate language to address the specific issue.

In addition to the supplemental comments, the DOE and Sandia are providing a map as requested by the New Mexico Environment Department. The enclosed map shows the location of each SWMU and AOC listed in Attachment K of the draft Permit.

If you have questions, please contact me at (505) 845-6036 or David Rast of my staff at (505) 845-5349.

Sincerely,

Geoffrey L. Beausoleil
Manager

2 Enclosures

cc: See Page 2

APR 02 2014

cc w/enclosures:

Dave Cobrain
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Dr. E, Bldg. 1
Santa Fe, NM 87505

William Moats
Hazardous Waste Bureau
New Mexico Environment Department
5500 San Antonio Dr. NE, Albuquerque, NM 87109

Cornelius Amindyas
Hazardous Waste Bureau
New Mexico Environment Department
5500 San Antonio Dr. NE, Albuquerque, NM 87109

Thomas Skibitski
Chief, DOE Oversight Bureau
New Mexico Environment Department
P.O. Box 5400, MS-1396, Albuquerque, NM 87185-5400

Laurie King
United States Environmental Protection Agency Region 6
Fountain Place Suite 1200
1445 Ross Ave., Dallas, TX 75202

Zimmerman Library
MSC05 3020
1 University of New Mexico, Albuquerque, NM 87101-0001

Amy Blumberg, SNL/NM, MS-0141
SNL Customer Funded Record Center, MS-0651
SFO Legal File (Cynthia Wimberly, SFO/Legal)
SFO Waste Management File (David Rast, SFO/ENG)

cc w/o enclosures:

Michael Hazen, SNL/NM, MS-0143
David Miller, SNL/NM, MS-0718
Sidney Gutierrez, SNL/NM, MS-0725
Francis Nimick, SNL/NM, MS-0729
Pamela Puissant, SNL/NM, MS-0729
Anita Reiser, SNL/NM, MS-0729
Jeffrey Jarry, SNL/NM, MS-1151
Tom Pfeifle, SNLNM, MS-1454
14-370-568326

U. S. Department of Energy and Sandia Corporation

**Supplemental Public Comments
Draft Hazardous Waste Permit for
Sandia National Laboratories**

**Albuquerque, New Mexico
EPA ID No. NM5890110518**

Draft Permit Issued September 17, 2012

CERTIFICATION STATEMENT

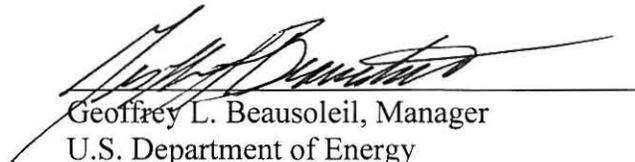
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, 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.



Michael W. Hazen, Vice-President
Sandia Corporation
Albuquerque, New Mexico
Operator

28 Mar 2014

Date signed



Geoffrey L. Beausoleil, Manager
U.S. Department of Energy
National Nuclear Security Administration
Sandia Field Office
Owner

2 APR 2014

Date signed

Enclosure A

**Draft Hazardous Waste Permit and
Granting of Corrective Action Complete Status for
Solid Waste Management Units/Areas of Concern**

**Sandia National Laboratories
NM5890110518**

**Supplemental Comments
U.S. Department of Energy
Sandia Corporation**

DOE/Sandia Supplemental Comments on Draft Resource Conservation and Recovery Act Facility Operating Permit

No.	Draft Permit Section	Page	Existing Text	Requested Revision	Discussion
1	Part 2, Section 2.2.3	19	<p>The Permittees may accept, store, treat or otherwise manage at the permitted units at the Facility, only the following hazardous or mixed wastes from off-site sources.</p> <ol style="list-style-type: none"> 1. Treatment-derived waste or residues from wastes generated at the Facility, sent off site for treatment at off-site facilities, and subsequently returned to the Facility prior to final disposition off-site may be managed at the Facility only subject to the following conditions: <ol style="list-style-type: none"> a. for wastes with no available site for final disposal, the Permittees shall provide written notice in accordance with Permit Section 1.14.1, either through mailing of a hard copy letter or via electronic mail that will be followed by submittal of a hard copy letter, to the Department that there is no available site for final disposal within five days of receipt of the treatment-derived waste or waste residues at the Facility; or b. for wastes with an available final disposal path, the Permittees shall store the wastes for not more than 90 days prior to shipping the wastes off-site. 	<p>The Permittees may accept, store, treat or otherwise manage at the permitted units at the Facility, only the following hazardous or mixed wastes from off-site sources.</p> <ol style="list-style-type: none"> 1. Treatment-derived waste or residues from wastes generated at the Facility, sent off site for treatment at off-site facilities, and subsequently returned to the Facility prior to final disposition off-site may be managed at the Facility only subject to the following conditions: <ol style="list-style-type: none"> a. for wastes with no available site for final disposal, the Permittees shall provide written notice in accordance with Permit Section 1.14.1, either through mailing of a hard copy letter or via electronic mail that will be followed by submittal of a hard copy letter, to the Department that there is no available site for final disposal within five days of receipt of the treatment-derived waste or waste residues at the Facility; or b. for wastes with an available final disposal path, the Permittees shall managestore the wastes for not more than 90 days prior to shipping the wastes off-site. 	<p>Please revise the requirement in b. as shown to be consistent with the initial statement, which allows storage, treatment, or other management at Permitted Units at SNL within the 90-day period. For example, hazardous or mixed wastes may undergo treatment during the 90-day period prior to shipping the wastes off-site for further management.</p>

DOE/Sandia Supplemental Comments on Draft Resource Conservation and Recovery Act Facility Operating Permit

No.	Draft Permit Section	Page	Existing Text	Requested Revision	Discussion
2	Part 5, Section 5.9	53	Soil samples shall be collected at a depth of 0-2 inches at the locations listed in Table 5-2 of this Permit Part. Approved analytical methods, preservation methods, holding times, and container requirements are listed in Table 5-3 of this Permit Part. Sample locations must be surveyed pursuant to Permit Section 8.10.2.5.	Soil samples shall be collected at a depth of 0-2 <u>0-6</u> inches at the locations listed in Table 5-2 of this Permit Part. Approved analytical methods, preservation methods, holding times, and container requirements are listed in Table 5-3 of this Permit Part. Sample locations must be surveyed pursuant to Permit Section 8.10.2.5.	Please revise the sample depth to reflect standard practice for collection of surface samples for corrective action, such surface samples are typically collected from depths of 0-6 inches. The additional depth is required to allow sampling personnel to accommodate rocks, debris, and other surface irregularities, and to collect sufficient soil in cases of elevated moisture content.
3	Part 5, Table 5-3	56	<i>Table footnote:</i> 1 Unless otherwise noted, methods are EPA SW-846 Methods. Use currently approved method revision.	<i>Table footnote:</i> 1 Unless otherwise noted, methods are <u>taken from EPA SW-846 Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, 1986 and all approved updates.</u> Use <u>the most currently approved method for analysis. Method numbers shown in this table are subject to change revision through future updates and may differ from those shown here. Equivalent methods may be substituted only if the equivalent method includes the same analyte list, method detection limits equal to or lower than the original method, and equivalent or higher data quality. If an equivalent method is used, the Permittees shall provide justification in the report to the Department.</u>	Please revise the footnote to provide consistency with the analytical requirements in Permit Attachment C (specifically Table C-4) regarding use of updated methods and changes in method numbers. Use of equivalent methods is consistent with Permit Attachment C and also with the requirements of the Post-Closure Care Permit for the SNL Chemical Waste Landfill.
4	Attachment D, Table D-5 row 2	89	First Alternate Ken Tetreault Sandia National Laboratories P.O. Box 5800 Albuquerque, New Mexico (505) 844-1346 (office) (505) 270-4089 (cell) (505) 283-1949 (pager) Home Phone (505) 822-6336	none	Please revise the table to delete Ken Tetreault from the list of emergency coordinators. This change and the following five changes will provide consistency with the current list of emergency coordinators in Attachment E of Hazardous Waste Management Facility Permit NM5890110518-1.

DOE/Sandia Supplemental Comments on Draft Resource Conservation and Recovery Act Facility Operating Permit

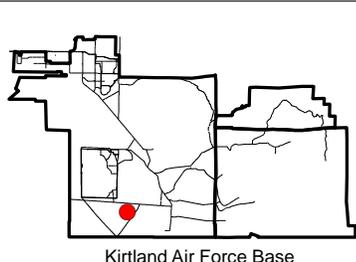
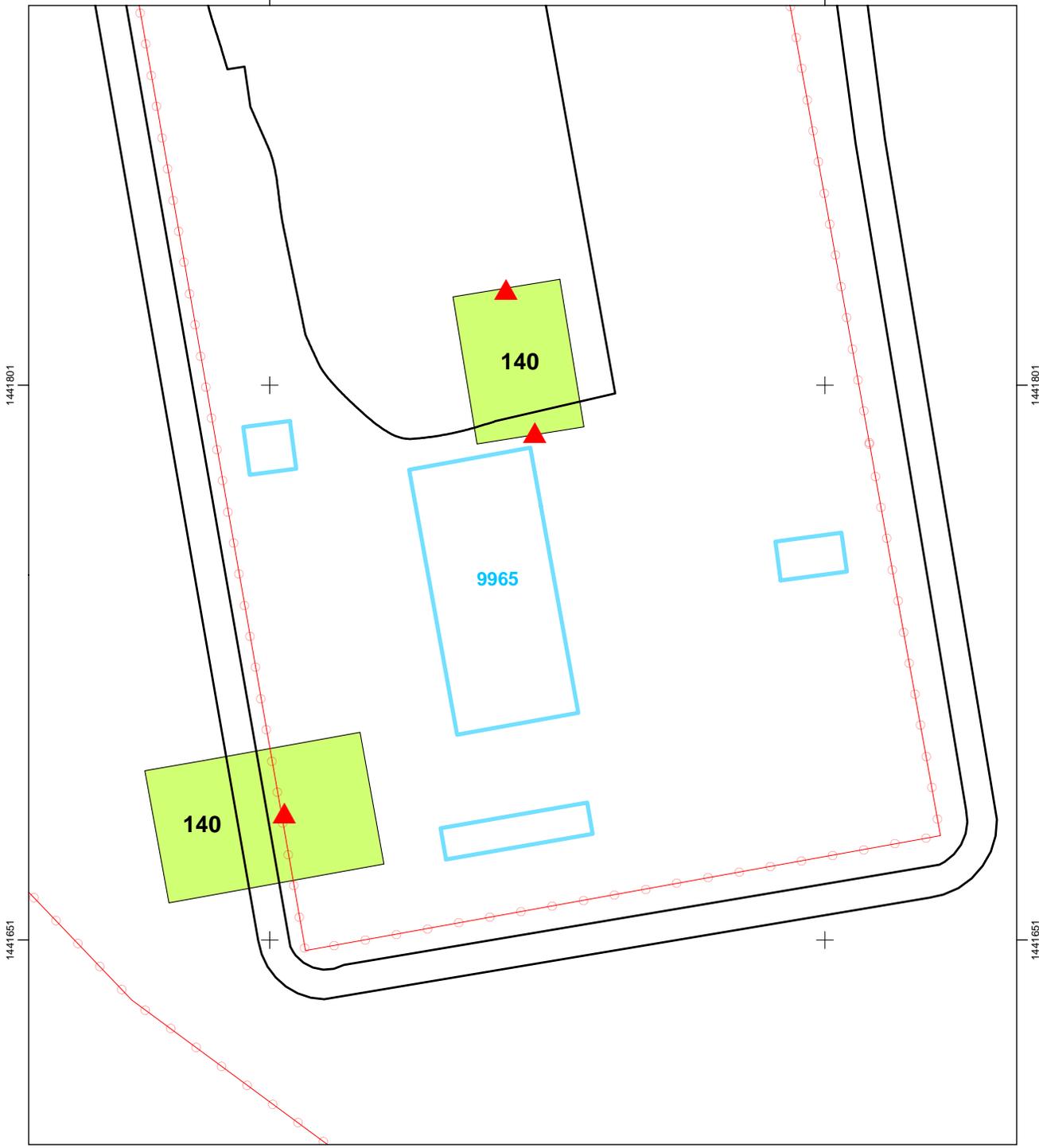
No.	Draft Permit Section	Page	Existing Text	Requested Revision	Discussion
5	Attachment D, Table D-5 rows 2 and 3	89	Second Alternate Chris Dean Sandia National Laboratories P.O. Box 5800 Albuquerque, New Mexico (505) 284-8083 (office) (505) 350-4982 (cell) (505) 283-1942 (pager) Home Phone (505) 268-8913	Second <u>First</u> Alternate Chris Dean Sandia National Laboratories P.O. Box 5800 Albuquerque, New Mexico (505) 284-8083 (office) (505) 350-4982 (cell) (505) 283-1942 (pager) Home Phone (505) 268-8913	Please revise the table to list Chris Dean as the first alternate emergency coordinator.
6	Attachment D, Table D-5 rows 3 and 4	89	Third Alternate Mary Ann Krauss Sandia National Laboratories P.O. Box 5800 Albuquerque, New Mexico (505) 845-9997 (office) (505) 250-2422 (cell) (505) 951-6335 (pager) Home Phone (505) 299-0793	Third <u>Second</u> Alternate Mary Ann Krauss Sandia National Laboratories P.O. Box 5800 Albuquerque, New Mexico (505) 845-9997 (office) (505) 250-2422 (cell) (505) 951-6335 (pager) Home Phone (505) 299-0793	Please revise the table to list Mary Ann Krauss as the second alternate emergency coordinator.
7	Attachment D, Table D-5 row 4	89	<i>none</i>	<u>Third Alternate</u> <u>Therese Martinez-Loner</u> <u>Sandia National Laboratories</u> <u>P.O. Box 5800</u> <u>Albuquerque, New Mexico</u> <u>(505) 284-5028 (office)</u> <u>(505) 401-0381 (cell)</u> <u>(505) 401-0381 (pager)</u> <u>Home Phone</u> <u>(505) 401-0381</u>	Please revise the table to list Therese Martinez-Loner as the third alternate emergency coordinator.

DOE/Sandia Supplemental Comments on Draft Resource Conservation and Recovery Act Facility Operating Permit

No.	Draft Permit Section	Page	Existing Text	Requested Revision	Discussion
8	Attachment D, Table D-5 row 5	89	<i>none</i>	Fourth Alternate Angel Ripoll Sandia National Laboratories P.O. Box 5800 Albuquerque, New Mexico (505) 284-5334 (office) (505) 573-0562 (cell) (505) 573-0562 (pager) Home Phone (505) 573-0562	Please revise the table to list Angel Ripoll as the fourth alternate emergency coordinator.
9	Attachment D, Table D-5 row 6	89	<i>none</i>	Fifth Alternate Tony Mocadlo Sandia National Laboratories P.O. Box 5800 Albuquerque, New Mexico (505) 844-0564 (office) (505) 283-1947 (pager) Home Phone (505) 332-9168	Please revise the table to list Tony Mocadlo as the fifth alternate emergency coordinator.
10	Attachment M, Table M-1 OU 1295, row 2	201	<i>SWMU 140:</i> 4 signs on SWMU perimeter, one each at selected corners of the SWMU	<i>SWMU 140:</i> 43 signs in the two areas that comprise the SWMU: on SWMU perimeter, 2 signs on the perimeter of the area north of Building 9965 – 1 on the south edge and 1 on the north edge; and 1 sign one on or near the fence in the middle of each the area southwest of Building 9965. at selected corners of the SWMU	Please revise the description of signs at SWMU 140 for consistency with SWMU features and revisions to Figure 5 (see comment 12).
11	Attachment M, Table M-1 OU 1306, row 2	202	<i>SWMU 196:</i> 1 sign in the middle of the SWMU	<i>SWMU 196:</i> 1 sign near the northeast corner in the middle of the SWMU	Please revise the location of the sign at SWMU 196 to the northeast corner of the SWMU. The current location in the middle of the SWMU presents an obstruction to vehicle and equipment traffic in the area.

DOE/Sandia Supplemental Comments on Draft Resource Conservation and Recovery Act Facility Operating Permit

No.	Draft Permit Section	Page	Existing Text	Requested Revision	Discussion
12	Attachment M, Figure 5	211	<i>Figure 5 showing SWMU 140 and signs</i>	<i>Figure 5 showing SWMU 140 and signs</i>	Please revise Figure 5 to show sign locations that are consistent with the SWMU features and proposed revisions to Table M-1. Locating a sign in the middle of the area north of Building 9965 presents an obstruction to vehicle and equipment traffic in the area. The revised figure is shown on the next page.

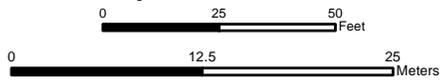


Kirtland Air Force Base

Legend

-  Sign Location
-  Unpaved Road
-  Fence
-  Building/Structure
-  SWMU with Ccontrols

Figure 5
Solid Waste Management
Unit 140 - Corrective Action
Complete with Controls

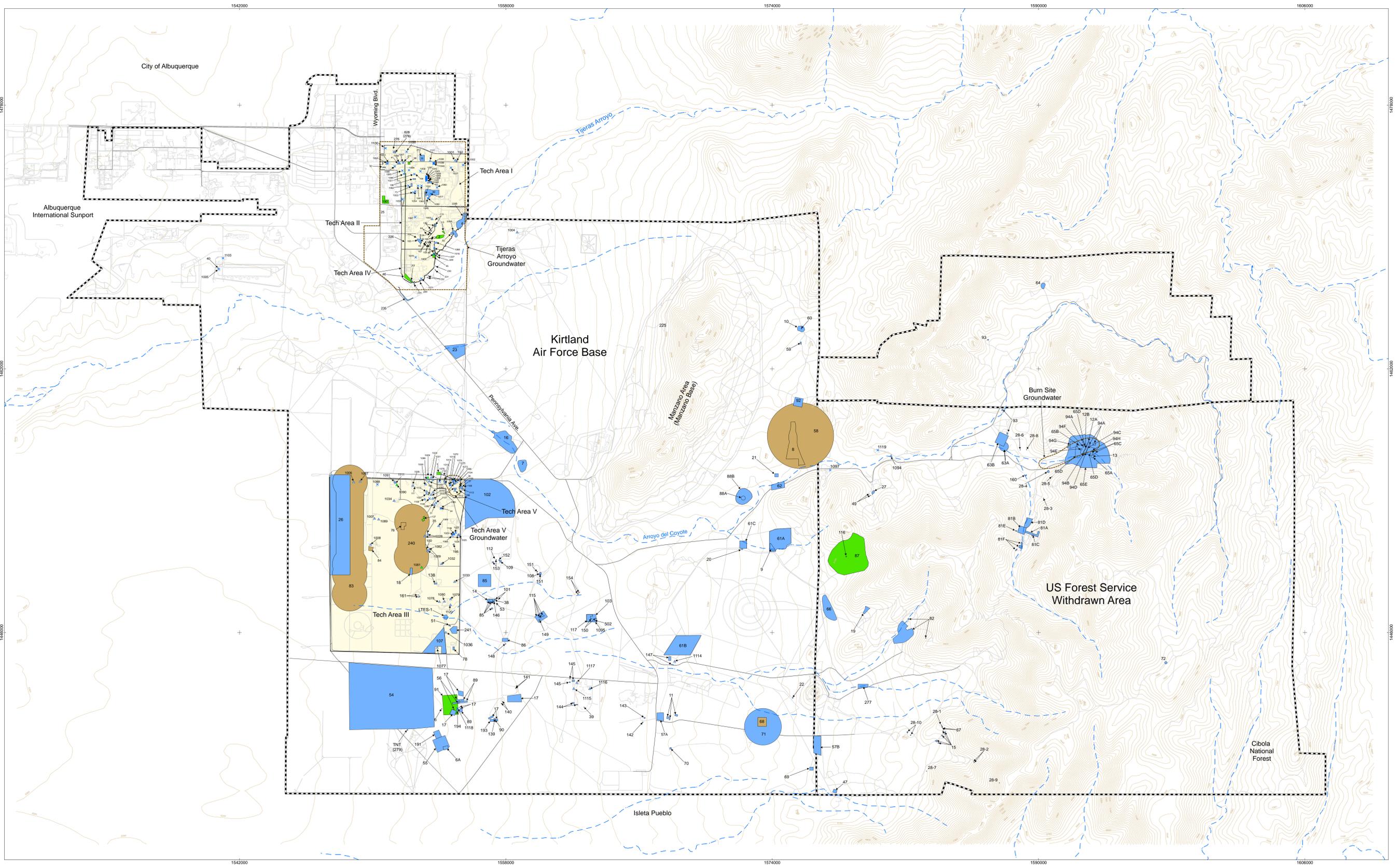


Projection: New Mexico State Plane, Central Zone 3002, 1983 North American Datum

Sandia National Laboratories, New Mexico
Environmental Geographic Information System

Enclosure B

Figure SNL-1



Legend

SWMU or AOC Requiring Corrective Action Under the Consent Order (See Table K-1)

- SWMU or AOC
- Groundwater Investigation

SWMU or AOC for which Corrective Action is Complete with Controls (See Table K-3)

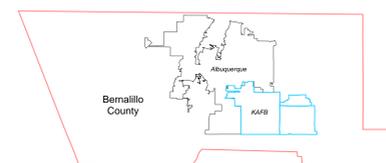
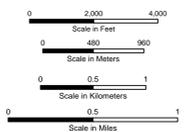
- SWMU or AOC
 - Miscellaneous drain or septic system
- Note: SWMU, 96 and 187 not shown

SWMU or AOC for which Corrective Action is Complete without Controls (See Table K-4)

- SWMU or AOC
- Miscellaneous drain or septic system
- Miscellaneous drain or septic system: no investigation needed

- SNL Technical Areas
- KAFB boundary
- Major road
- Road
- 40-foot elevation contour
- Drainage feature

- AOC Area of Concern
- DOE US Department of Energy
- KAFB Kirtland Air Force Base
- SNL Sandia National Laboratories
- SWMU Solid Waste Management Unit



Sandia National Laboratories, New Mexico
Environmental Geographic Information System

**Figure SNL-1
Solid Waste Management Units
and Areas of Concern
Sandia National Laboratories
Albuquerque, New Mexico
March 14, 2014**



Transverse Mercator Projection, New Mexico State Plane Coordinate System,
Central Zone, 1983 North American Horizontal Datum
1988 North American Vertical Datum

MapId = mb14065 03/14/14 SNL EGIS ORG. 4142 MBarthel