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FACT SHEET
August 20, 2007

**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, U0101, U102, U103, U105 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 20.4.1.200 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-foot 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 be 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 1 MAXIMUM AMOUNT OF WASTE ALLOWED TO BE STORED AT PERMITTED UNITS	
Permitted Storage Unit/Waste Management Area	Maximum Amount of Waste (Gallons)
<i>Hazardous Waste Management Unit (HWMU)</i>	
Building 958	14,988
Building 958C (Modular Storage Building)	1,250
Building 958C (Modular Storage Building)	1,250
Building 959	1,898
<i>Radioactive and Mixed Waste Management Unit (RMWMU)</i>	
Building 6920	3,355
Building 6921	1,953
Building 6925	20,790
Building 6926	20,790
Modular Storage Building TP150	275
Modular Storage Building TP153	275
Asphalt Area North, East, and West of Building 6920	4,950
<i>Auxiliary Hot Cell Unit (AHCU)</i>	
Building 6597	225
Building 6597 Storage Silos	364
<i>Manzano Storage Bunkers (MSB)</i>	
Bunker 37034	6,270
Bunker 37045	4,620
Bunker 37055	4,620
Bunker 37057	4,620
Bunker 37118	8,800

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

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.

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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.