

MAY 31 1984

Los Alamos National Scientific Laboratory: Requested extension of due date for Part B Permit Application

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Los Alamos National Scientific Laboratory (LANSL), located in Los Alamos, New Mexico, is owned by the U.S. Department of Energy and operated under contract by the University of California. The mission of LANSL is the application of science and technology to solve national problems including weapons development and energy supply and conservation programs, while basic science research complements and strengthens its fundamental technical capabilities.

LANSL is a non-commercial facility which generates, transports, treats, and disposes of hazardous wastes. LANSL's hazardous waste management (HWM) facilities consist of land disposal and thermal treatment. Land disposal facilities, as indicated on the Part A, consist of a 100 acre-ft trenchtype landfill (100 acre-ft landfill capacity is separated into two geographically separate areas - the actual capacity of each is not known) and a 4000 gallon capacity surface impoundment. The thermal treatment consists of burning accumulations of discrete pieces of wastes which are collected, packaged, stored, and periodically burned at the burning ground. Accumulations of wastes in sumps are collected in a special truck, taken to filter beds at the burning ground, dried and burned. LANSL also has an incinerator used for incinerating radioactive wastes and radioactively contaminated PCB liquids.

LANSL's Part B was called-in by EPA Region VI on February 22, 1984, with a subsequent due date of September 1, 1984.

On May 10, 1984, a letter was received by the Regional Administrator of Region VI, Mr. Dick Whittington, from Mr. Harold E. Valencia, the Los Alamos Area Manager of the Albuquerque Operations Office of the Department of Energy (DOE). This letter requests an extension of the due date for the Part B Permit Application of 180 days. If granted, this extension would change the due date from September 1, 1984, to April 1, 1985. DOE's basis for this request is "due to the complexity of the Laboratory's (LANSL's) operations, and large number (31) of technical areas which are involved".

LANSL's Part A does indicate a large number (136 listed EPA hazardous wastes) of hazardous wastes which will be handled and disposed of at the HWM facilities.

LANSL feels that the September 1, 1984 due date for the Part B Permit Application is "not realistic".

6AW-HT:WRIGHT:kc:7-8941:5/23/84



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Permit



In a discussion with Peter Pache, Acting Manager, Hazardous Waste Section of the New Mexico Environmental Improvement Division (EID) on May 15, 1984, he indicated EID had received a copy of the same request from LANSL. EID is not in favor of granting any type of extension to LANSL for the following reason. If LANSL was provided with an extension other HWM facilities would subsequently request extensions and EID does not feel this extension of the due date could be adequately justified because LANSL's HWM facilities are not of such complexity and size as to require additional time to prepare a Part B Permit Application.

EID's recommendation in this matter is a serious consideration because an extension to April 1, 1985 would result in EID as the lead agency. EID is scheduled to receive complete authorization over the RCRA program in New Mexico in January 1985. In addition, EID would prefer not to be the lead agency with LANSL since a Memorandum of Understanding, in regards to procedures for permitting DOE facilities, does not exist between EID and DOE.

In agreement with EID, it is recommended that LANSL not be granted the requested 180 day extension. An option which does exist, but which is not recommended or requested by LANSL, is to grant an extension of less than 180 days. However, because it is a non-commercial HWM facility, LANSL may require additional technical guidance and assistance be provided by EPA to ensure a complete Part B is submitted by September 1, 1984. LANSL has requested, and we are currently in the process of providing information on additional technical guidance. Any assistance which may be requested by LANSL in the future will be addressed promptly.

Approve Extension (180 days) \_\_\_\_\_.

Approve Extension (other than the requested 180 days) \_\_\_\_\_.

Deny Extension \_\_\_\_\_.