

STATE OF NEW MEXICO

ENVIRONMENTAL DEPARTMENT

P.O. Box 569, Santa Fe, New Mexico 87504-0569
(505) 824-6020

DIRECTOR

April 10, 1985

Mr. Harold Valencia
Department of Energy
Los Alamos Area Office
Los Alamos, New Mexico 87544

Dear Mr. Valencia:

We have reviewed your revised Resource Conservation and Recovery Act (RCRA) Part A application dated April 1, 1985. We have several questions which will require further information from you to clarify so that we may properly process your request. The references are to sections of the 1984 New Mexico Hazardous Waste Management Regulations and will provide guidance on the details necessary.

1. The seven-fold increase in storage capacity and treatment tankage needs to be more fully explained (Section 302.C.3.b.).
2. The RCRA Part A currently on file for your facility identifies a 100 acre landfill (Code D-80) which we understood referred to Tech Area 54 Area G. Please identify specifically the area to which this code is to apply as your revised Part A states on Page 2 that TA-54 Area G will no longer be used.
3. If it is your intention to cease use of TA-54 Area G for landfill of hazardous wastes, please submit for approval a closure plan for this area (Section 206.C.2.). Similarly, closure plans for the surface impoundment must be submitted by LANL for approval.
4. Please describe the landfill plans for listed wastes F-027 and F-028. The Federal Register of January 14, 1985 describes specific factors to consider before approval may be given for landfill of F-027 (50 FR 2004)(40CFR 264.317). Please address these factors in describing your plans.
5. The revised Part A indicates that you expect to treat waste F-027 by incineration. Please identify which incinerator facility you intend to use.



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We understand that you wish to make no changes to the T-04 thermal treatment portion of your permit. Would you please confirm this either in your cover letter or in the narrative portion of the Part A?

We look forward to your response so that we may continue to process your request. If you have any questions, please do not hesitate to call me at 984-0020, ext. 340.

Sincerely,



C. Kelley Crossman
Environmental Scientist
Hazardous Waste Section

CKC/mp

cc: Guanita Reiter, EPA, Region VI