



Department of Energy
 Field Office, Albuquerque
 Los Alamos Area Office
 Los Alamos, New Mexico 87544

BARBARA/BLUCE

File LANL RED 92

HSWA 92

AUG 19 1992



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Honker, Chief
 RCRA Permits Branch
 Environmental Protection Agency, Region 6
 First Interstate Bank Tower
 1445 Ross Avenue
 Dallas, TX 75202

Dear Mr. Honker:

The Department of Energy (DOE) received a request from the Environmental Protection Agency (EPA), Region 6, to modify the Hazardous and Solid Waste Amendments (HSWA) portion of the Resource Conservation and Recovery Act (RCRA) Permit, issued to Los Alamos National Laboratory (Laboratory) on March 8, 1990. EPA requested that the Laboratory submit a Class I Permit Modification to include the Solid Waste Management Units (SWMUs) that are in the 1990 SWMU Report. You also requested that the Laboratory clarify a previous permit modification request concerning the Corrective Measures Study schedules.

Staff of the Laboratory's Environmental Protection Group (EM-8) and the Environmental Restoration Group (EM-13) have been validating the SWMU report prior to incorporating it into the permit modification requested by EPA. The two groups are performing a Quality Assurance check and a validation of each unit that was originally included in the report. The report will then be amended or modified, as appropriate. It is anticipated that several units will be deleted from the 1990 SWMU report, and therefore will not be included in the permit modification. Some units will be deleted based on information gathered during the RCRA Field Investigations, information which may not have been available two years ago. Other units will be removed based on guidance received from EPA and proposed regulations that clearly exclude specific unit types from the SWMU definition. Finally there are units that may be regulated under the authority of RCRA regulations, and these units will be identified appropriately to avoid dual regulation.

Due to the validation efforts, submittal of the requested permit modification has been delayed. However, we believe that a thorough validation of the 1990 SWMU report is in our mutual

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best interest, prior to permit modification. Please be assured that every effort is being made to expedite the validation process and preparation of the permit modification. It is also our intent to modify the 1990 SWMU report to include a method to differentiate between SWMUs that would be regulated by the HSWA Permit and SWMUs that would be regulated by other regulations.

DOE will submit the requested modification and clarification no later than October 30, 1992. If you have any questions, please feel free to contact Mr. Steve Slaten of my staff at (505) 665-5050.

Sincerely,


Nancy L. Bellows
Area Manager

LESH:6SS-040

cc:

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