



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

OCT 25 1993

Barbara Driscoll
 NM/FF Section (6H-PN)
 Environmental Protection Agency
 1445 Ross
 Dallas, TX 75202

Dear Ms. Driscoll:

We received the draft permit for the Class III permit modification for Los Alamos National Laboratory (LANL).

After review, we determined there are some significant inconsistencies with the incorporation of new Solid Waste Management Units (SWMU) into tables A and B. It appears that in an attempt to cross-walk SWMUs from the 1988 and 1990 SWMU reports some units have been misidentified, resulting in errors in the Permit Modification. Because we have not had enough time to perform a complete evaluation, we would appreciate a 30-day extension of the comment period for comments relating to Tables A and B only.

Within this 30-day extension, LANL would be able to rectify inconsistencies in the tables as well as determine what would be a necessary time frame for incorporation of the new SWMUs into the RFI delivery schedule.

It also appears that the entire Module VIII modification has been retyped, which resulted in some typographical errors. We are listing as comments those suggested corrections by page number, paragraph, and correction. We believe that the remainder of the permit modification is correct and should continue the modification cycle.

<u>PAGE</u>	<u>PARAGRAPH</u>	<u>LINE</u>	<u>SUGGESTED CORRECTION</u>
2	2	4	Delete - insert semi-colon
5	11	3	LAO-S is LAO-5
8	2	1	Delete extra space before "Protection"
12	1	1	Insert a period after "incorporated"
13	2	2	"i.e." change to "e.g."
14	10	7	"that" change to "than"
15	2	7	"LANI" change to "LANL"
16	5	2	After "outline" change to i



0501
Permits

OCT 25 1993

Barbara Driscoll

2

<u>PAGE</u>	<u>PARAGRAPH</u>	<u>LINE</u>	<u>SUGGESTED CORRECTION</u>
17	1	7	"SWMU's" change to "SWMUs"
17	1	9	"SWMU's" change to "SWMUs" (twice)
26	5	1	Before a, add "i"
26	6	1	Before b, add "ii"
26	7	1	Before c, add "iii"
27	1	1	Before k, add "iv"
32	2	1	Before i, add "1"
32	3	1	Before ii, add "2"
33	6,7	2,2	Align column
44	5	4	"C" in "which" - change to "c"
44	5	5	"i.e." change to "e.g."
44	10	4	"s" in representative -> "S" "P" in description -> "p"
45	2	1	"U" in distribUtion" -> "u"
46	2	3	Comma after "floodplains"
47	1	1	"G" in Groundwater -> "g" "I" in Investigation -> "i"
49	1	8	Change "n" to "r" in determination
49	5	4	Delete comma and "etc" after "standards"
50	3	2	Delete capital letters from "representatives"
50	8	2	Delete capital letter from "which"
52	1	1	Delete capital letter from "purpose"
54	2	8	Delete capital letter from "purpose"
54	4	7	Delete capital letter from "past"
54	5	1	Delete capital letter from "plan"
55	3	7	Delete capital letter from "perform"
56	3	2	Delete capital letters from "initial screening"

OCT 25 1993

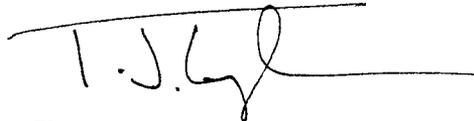
Barbara Driscoll

3

<u>PAGE</u>	<u>PARAGRAPH</u>	<u>LINE</u>	<u>SUGGESTED CORRECTION</u>
56	3	3	Change "it's" to "its"
56	4	5	Insert period after "required".
57	2	13	Insert period after "project". Delete capital letter from "way"
58	1	6	Change "i.e." to "e.g."
62	16	1	Delete capital letters from "implementation precautions"

We appreciate the opportunity to send you these comments. If you have any further questions or concerns, please call Steve Slaten, Environment, Safety and Health Branch, LAAO, at (505) 665-5050.

Sincerely,



Theodore J. Taylor
Program Manager
Environmental Restoration Program

LESH:3TT-011

cc:

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