

Permit



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GOVERNOR

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FEDERAL EXPRESS
NUMBER 3269223086

February 17, 1995

Mr. Larry Kirkman
Department of Energy
Los Alamos Area Office
528 35th Street
Los Alamos, New Mexico 87545

Dear Mr. Kirkman:

The New Mexico Environment Department has completed processing of the requested modifications to the Los Alamos National Laboratory Hazardous Waste Operating Permit.

Enclosed you will find two separate documents:

Enclosure 1 is a list of modifications made to the LANL Hazardous Waste Permit. Each modification listed indicates the location of the modification within the permit and a brief description of that modification.

Department Initiated Class I Modifications have been made in keeping with the department's policy on permit management and permit modification tracking. These modifications are described in Enclosure 1 as the addition of headers and footers to every page. Additional Agency Initiated Class I Modifications are the correction of administrative titles "Director" to "Secretary" located throughout the permit.

Enclosure 2 is a list of the Permit Modifications requested by LANL that were not made. The reasons for disapproval are given in the text next to the description of the requested modification. Note that items 4, through 11 require LANL to submit missing information/documents within **ten (10) calendar days** of the receipt of this correspondence.

Included as Enclosure 3 is the Redline/strikeout version of the permit page to assist the reader in rapid identification of modifications made. Language to be deleted from the permit are highlighted and stricken out. Language added to the permit is highlighted only.



15418

Enclosure 4 contains the clean copy pages to be inserted into the Permit.

LANL is requested to place Enclosures 1 and 2 in the front of the permit to provide a historical record of modifications to the permit.

If you have any questions about the incorporation of the listed modifications to the Hazardous Waste Operating Permit contact Mr. Robert S. (Stu) Dinwiddie of my staff at (505) 827-4308 or the above address.

Sincerely,

Barbara Hoditschek,
Program Manager RCRA Permits
Hazardous and Radioactive Materials Bureau

cc:
Benito Garcia, Bureau Chief
Barbara Hoditschek, Program Manager
Mr. David Neleigh, EPA Region VI
Red File

Enclosure 1
LIST OF CLASS I MODIFICATIONS MADE
to the Los Alamos National Laboratory
Hazardous Waste Permit

Effective: January 30, 1995

Following is a list of the Class I Modifications made to the Los Alamos National Laboratory Hazardous Waste Permit during the month of January 1995 by the Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED). In the Permit the Modifications are indicated by ~~striking out and shading the items to be deleted~~ and using shading for the material that has been added. This will assist the reader with rapid identification of the current modifications and when they were made.

Module	Page(s)	Section	Paragraph/Line	Description of Modification
Table of Contents	All			Add: a "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified. Add: a "footer" on every page to identify where the page belongs and which page number it is of the total number of pages. Renumbering of all pages to reflect the changes in pagination and addition of "headers" and "footers" throughout the Permit.
10		H.		Delete: Section referring to the Batch Waste Treatment Unit

Module	Page(s)	Section	Paragraph/Line	Description of Modification
Table of Contents	10	Tables		Add: Module II Table 1

Module	Page(s)	Section	Paragraph/Line	Description of Modification
I	All			<p>Add: a "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: a "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>
I	1	I.B.	Paragraph 1 Line 3	<p>Delete: "D" Add: "B"</p>
I	2	I.D.2.	Paragraph 1 Line 7	<p>Delete: "V" Add: "IX"</p>
I	2	I.D.3.	Paragraph 1 Lines 9 and 10	<p>Delete: "Director" Add: "Secretary"</p>
I	3	I.D.7.	Paragraph 1 Lines 3, 4 and 9	<p>Delete: "Director" Add: "Secretary"</p>
I	4	I.D.7.a 1 through 7		<p>Add: Language that identifies information LANL may update every six months of the calendar year.</p>

Module	Page(s)	Section	Paragraph/Line	Description of Modification
I	4	I.D.8	Paragraph 1 Line 3	Delete: "Director" Add: "Secretary"
I	5	I.D.8.e.	Paragraph 1 Lines 1 and 7	Delete: "Director" Add: "Secretary"
I	6	I.D.9.b.	Paragraph 1 Line 2	Delete: "Director" Add: "Secretary"
I	6	I.D.9.b.	Paragraph 1 Lines 8 and 9	Delete: "fgacility" Add: "facility".
I	6	I.D.10	Paragraph 1 Line 2	Delete: "Director" Add: "Secretary"
I	6	I.D.11.a.	Paragraph 1 Line 1	Delete: "Director" Add: "Secretary"
I	7	I.D.11.b.(i)	Paragraph 1 Line 1	Delete: "Director" Add: "Secretary"
I	7	I.D.11.b.(ii)	Paragraph 1 Line 1	Delete: "Director" Add: "Secretary"
I	7	I.D.12.	Paragraph 1 Line 2	Delete: "Director" Add: "Secretary"
I	7	I.D.15.	Paragraph 1 Line 4	Delete: "Director" Add: "Secretary"

Module	Page(s)	Section	Paragraph/Line	Description of Modification
I	7	I.E.	Paragraph 1 Lines 1 and 2	Delete: "Director" Add: "Secretary"
I	9	I.H.2.	Paragraph 1 Line 2	Delete: "Director" Add: "Secretary"
I	9	I.H.3.	Paragraph 1 Line 11	Delete: "Director" Add: "Secretary"
I	9	I.H.3.	Paragraph 1 Lines 12 and 13	Delete: "Environmental Improvement Division" Add: "Environment Department".
I	9	I.H.3.	Paragraph 1 Line 13	Delete: "this" Add: "his"
I	9	I.H.3.c.	Paragraph 1 Lines 7 and 8	Add: Technical Area Numbers 60 through 74

Module	Page(s)	Section	Paragraph/Line	Description of Modification
II	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: A "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>
II	1	II.B.2.	Paragraph 1 Line 3	<p>Correction of typographical error: Add: a dash (-) to change "offsite" to "off-site".</p>
II	1	II.B.2.	Paragraph 1 Lines 7 through 11 and 15 through 16	<p>Add: Language authorizing LANL to bring IDW/RW off-site waste from specific locations on-site.</p>
II	2	II.C.2.	Paragraph 1 Line 7	<p>Delete: "Director" Add: "Secretary"</p>
II	2	II.E.1.	Paragraph 1 Line 8	<p>Delete: "Director" Add: "Secretary"</p>
II	3	II.E.2.f.	Paragraph 1 Line 4	<p>Delete: "Director" Add: "Secretary"</p>

Module	Page(s)	Section	Paragraph/Line	Description of Modification
II	3	II.F.	Paragraph 1 Line 6 and 7	Delete: "Director" Add: "Secretary"
II	5	II.I.3	Paragraph 1 Line 1 and 2	Delete: "Director" Add: "Secretary"
II	7	II.K.1.h.	Paragraph 1 Lines 6 and 7	Delete: "Director" Add: "Secretary"
II	7	II.K.2.b.	Paragraph 1 Line 3	Delete: "Director" Add: "Secretary"
II	8	II.K.2.b.	Paragraph 4 Line 2	Delete: 827-9329 Add: 470-2657
II	8	II.K.2.c.	Paragraph 1 Line 1 and 2	Delete: "Director" Add: "Secretary"
II	9	II.K.2.c.	Paragraph 1 Line 5	Delete: "Director" Add: "Secretary"
II	9	II.K.2.c.	Paragraph 2 Lines 1, 2 and 3	Delete: "EID Director" Add: "Secretary" Add: P.O. Box 26110
II	10	II.L	Paragraph 1 Line 6	Delete: "Director" Add: "Secretary"
II	10	II.L.3.	Paragraph 1 Line 2	Delete: "Director" Add: "Secretary"

Module	Page(s)	Section	Paragraph/Line	Description of Modification
II	12 - 14		Table 2-1	Add: Table 2-1

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III	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: of a "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>
III	1	III.A.1.d.	Paragraph 1	Change in language describing the storage of gas cylinders at TA-54 Area L.
III	1	III.A.1.e.	Paragraph 1 Line 3	Delete: "Director" Add: "Secretary"
III	2	III.A.1.f.	Paragraph 1 Line 3	Add: "or equivalent"
III	2	III.A.1.f.	Paragraph 1 Lines 1 and 2	Add: "54-70"
III	2	III.A.2.d.	Paragraph 1 Lines 2 and 3	Add: "or equivalent"

Module	Page(s)	Section	Paragraph/Line	Description of Modification
III	3	III.B.3.b.	Paragraph 1 Lines 2 and 3	Delete: "accumulation" Add: "accumulation"
III	3	III.B.3.c.	Paragraph 1 Lines 4 and 7	Delete: "prohibition" Add: "prohibition"
III	4	III.C.3.c.	Paragraph 1 Line 1	Delete: "seventeen 2,220" Add: "17,220"
III	5	III.C.3.f.	Paragraph 1 Line 1	Delete: "fifty"

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IV	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: A "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>
IV	1	IV.A.1.		<p>Delete: entire section referring to the Batch Waste Treatment Unit.</p>
IV	1	IV.A.2.		<p>Renumbering of this Section to indicate deletion of the Batch Waste Treatment Unit in section IV.A.1.</p>
IV	1	IV.A.2.	Paragraph 1 Line 2	<p>Delete: "four" Add: "two"</p>
IV	2	IV.B.5.c.	Paragraph 1 Line 7	<p>Delete: "tothe" Add: "to the"</p>
IV	2	IV.C.1.		<p>Delete: entire section referring to the Batch Waste Treatment Unit.</p>

Module	Page(s)	Section	Paragraph/Line	Description of Modification
IV	2	IV.C.2.		Renumbering of this Section to indicate deletion of the Batch Waste Treatment Unit in section IV.C.2.
IV	2 & 3	IV.D.1. (a-e)		Delete: entire section referring to the Batch Waste Treatment Unit.
IV	3	IV.D.2.		Renumbering of this Section to indicate deletion of the Batch Waste Treatment Unit in section IV.D.1.
IV	4	IV.E.1. (a-e)		Delete: entire section referring to the Batch Waste Treatment Unit.
IV	4	IV.E.2.		Renumbering of this Section to indicate deletion of the Batch Waste Treatment Unit in section IV.E.1.
IV	5	IV.E.3.		Renumbering of this Section to indicate deletion of the Batch Waste Treatment Unit in section IV.E.1.
IV	6	IV.H.1. (a.,b.)		Delete: entire section referring to the Batch Waste Treatment Unit.
IV	6	IV.H.2.		Renumbering of this Section to indicate deletion of the Batch Waste Treatment Unit in section IV.H.1.

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V	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: A "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>
V	10	V.I.5.b.	Paragraph 1 Line 6	<p>Delete: "EID" Add: "NMED"</p>
V	11	V.J.3	Paragraph 1 Line 2	<p>Add: "either"</p>

Module	Page(s)	Section	Paragraph/Line	Description of Modification
VI	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: A "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>

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VII	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: A "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>
VII	1	VII.A.1.	Paragraph 1 Line 3 and 4	<p>Delete: "16-1150" Add: "16-1409"</p>

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
A	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: A "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>
A	1			<p>Delete: "Enclosure 2" in the upper right hand corner.</p>
A	1	A.1	Paragraph 1 Line 1 through 5	<p>Add: Language introducing the Waste Analysis Plan.</p>
A	1	A.2	Paragraph 1 Line 2	<p>Delete: "A.1"</p>
A	1	A.2	Paragraph 2 Line 1	<p>Delete: "LANL" Add: "the Laboratory"</p>
A	1	A.2	Paragraph 3 Line 1	<p>Delete: section title "A.2" that is in an incorrect location.</p>

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
A	1	A.2.1	Paragraph 1 Line 4	Add: "the" twice
A	2	A.2.2	Paragraph 1 Line 10	Delete: "They also generate" Add: "This shop generates"
A	2	A.2.2	Paragraph 1 Line 5	Add: "plating solutions"
A	2	A.2.3	Paragraph 1 Line 3	Add: "acid"
A	2	A.2.4	Paragraph 1 Lines 4 and 5	Add: "the" and "they contain when generated"
A	3	A.2.5	Paragraph 1 Line 1 and 2	Delete: "exhibit the characteristic of EP toxicity" Add: "exceeds TCLP levels" and "()"
A	3	A.2.5	Paragraph 1 Line 8	Delete: "EP toxic" Add: "a TCLP waste"
A	3	A.2.6	Paragraph 1 Line 3	Delete: "Pan AM" Add: "JCI"
A	3	A.2.6	Paragraph 1 Line 5 and 6	Add: "e.g." twice
A	3	A.3.1	Paragraph 1 Line 5	Delete: "HSE" Add: "CST"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
A	4	A.3.1	Paragraph 2	Add: entire paragraph, except "Additional"
A	4	A.3.1	Paragraph 3 Lines 1 through 7	Delete: first seven lines
A	4	A.3.1	Paragraph 3 Line 9	Add: "hazardous waste"
A	4	A.3.1	Paragraph 3 Line 10	Delete: "label" Add: "marking"
A	4	A.3.2	Paragraph 2 Line 1 and 2	Delete: "Organics, including solvent wastes such as" Add: "Flammables, such as organic solvents (e.g.
A	4	A.3.2	Paragraph 7 Line 1 through 4	Rewrite entire section to clarify classification of waste.
A	4	A.3.2	Paragraph 8 Line 1	Delete: "RGN" Add: "DOT Hazard Class"
A	5	A.4	Paragraph 1 Lines 1 and 2 and part of 3	Delete: lines 1, 2 and part of 3 Add: lines 3 through 9
A	5	A.4	Paragraph 3 Line 3	Add: "Part"
A	5	A.4	Paragraph 4 Line 1 and 2	Delete: "EP Toxic" Add: "TCLP"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
A	5	A.4	Paragraph 4 Line 1	Delete: "means" Add: "refers to"
A	5	A.4	Paragraph 6 Lines 1 through 5	Delete: part of lines 1 and all of 2. Add: lines 3, 4 and 5.
A	5	A.4	Paragraph 7 Line 1 through 3	Add: entire paragraph
A	5	A.4	Paragraph 8 Lines 1 and 2	Delete: "apparatus" Add: "References to the use of a", "-" and "instruments"
A	5	A.4.1	Paragraph 1 Line 2	Delete: "split" Add: "divided"
A	5	A.4.1	Paragraph 1 Line 3	Delete: "material" Add: "chemical"
A	5	A.4.1	Paragraph 1 Line 4	Delete: "labpack" Add: "commercial chemical"
A	5	A.4.1.1	Paragraph 1 Line 4	Delete: "overpack" Add: "lab pack"
A	6	A.4.1.1	Paragraph 1 Lines 1 and 2	Add: "compatible inorganic and organic wastes are packaged together in these lab pack containers."
A	6	A.4.1.1	Paragraph 1 Line 6	Delete: "overpack" Add: "lab pack"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
A	6	A.4.1.2	Paragraph 1 Line 8	Delete: "Since" Add: "Because"
A	6	A.4.1.2	Paragraph 1 Line 10	Delete: "EP Toxic" Add: "TCLP"
A	6	A.4.1.2	Paragraph 2 Line 4	Delete: "HSE" Add: "CST"
A	6	A.4.1.3	Section Title	Delete: "labpack" Add: "commercial chemical"
A	6	A.4.1.3	Paragraph 1 Line 1	Delete: "labpack" Add: "commercial chemical"
A	7	A.4.1.4	Paragraph 1 Lines 3 and 4	Add: "on pH, flashpoint, ash content, viscosity, heat value, total organic halogens, and total organic chlorine."
A	7	A.4.1.4	Paragraph 1 Line 4	Delete: "described in Section A.4.1.3" and "and" Add: "These wastes"
A	7	A.4.2	Paragraph 1 Line 3	Delete: "labpack" Add: "commercial chemical"
A	7	A.4.2.1	Section Title	Delete: "Labpack"
A	7	A.4.2.1	Paragraph 1 Lines 2 and 3	Delete: "of acid waste" Add: "unused acids in" and "MSDS"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
A	7	A.4.2.1	Paragraph 1 Line 6	Delete: "raw material" Add: "commercial product"
A	8	A.4.2.2	Paragraph 1 Lines 2 and 3	Delete: "EP Toxic" Add: "TCLP"
A	8	A.4.2.2	Paragraph 2 Line 6	Delete: "EP Toxic" Add: "TCLP"
A	8	A.4.2.2	Paragraph 3 Lines 1 and 2	Delete: "Los Alamos" Add: "the Laboratory"
A	8	A.4.2.2	Paragraph 3 Line 4	Add: "waste"
A	8	A.4.2.2	Paragraph 3 Line 5	Delete: "which" Add: "that"
A	8	A.4.2.2	Paragraph 3 Line 7	Add: "waste"
A	8	A.4.2.2	Paragraph 3 Lines 11 and 12	Delete: "EP Toxic" and "allows confirmation" Add: "TCLP" and "confirms"
A	8	A.4.2.2	Paragraph 3 Lines 13 and 14	Delete: "what" and "are present" Add: "identifies the"
A	8	A.4.2.2	Paragraph 4 Line 2	Delete: "it" Add: "these wastes" and "be characterized"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
A	8	A.4.2.2	Paragraph 4 Line 3	Delete: "follow" and "pattern established" Add: "following" and "procedures described"
A	8	A.4.3	Section Title	Delete: "basic" Add: "caustic"
A	8	A.4.3	Paragraph 1 Line 2	Delete: "basic" and "split" Add: "caustic" and "divided"
A	8	A.4.3	Paragraph 1 Line 3	Delete: "labpack" Add: "commercial chemical"
A	8	A.4.3	Paragraph 1 Lines 4 and 5	Delete: "entity" Add: "entity for"
A	8	A.4.3.1	Section Title	Delete: "Labpack" Add: "Commercial chemical"
A	8	A.4.3.1	Paragraph 1 Lines 2 and 3	Delete: "of basic waste" Add: "caustic products (bases) in their"
A	8	A.4.3.1	Paragraph 1 Line 4	Add: " and MSDSs"
A	8	A.4.3.1	Paragraph 1 Line 6	Delete: "raw material" Add: "commercial product"
A	9	A.4.3.2	Paragraph 2 Lines 2 and 3	Delete: "EP Toxic" Add: "TCLP"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
A	9	A.4.3.2	Paragraph 4 Line 7	Delete: "EP Toxic" Add: "TCLP"
A	9	A.4.3.2	Paragraph 5 Line 1	Add: "stream"
A	9	A.4.3.2	Paragraph 5 Lines 2 and 3	Delete: "it", "follow" and "pattern established" Add: "these wastes", "be characterized", "following" and "procedures described"
A	9	A.4.4	Paragraph 1 Line 2	Delete: "split" Add: "divided"
A	9	A.4.4	Paragraph 1 Line 4	Delete: "per" Add: "according to the procedures described"
A	10	A.4.4	Paragraph 2 Lines 1 through 3	Delete: "is", "They" and "overpack" Add: "are" and "These wastes" and "lab pack"
A	10	A.4.4	Paragraph 1 Line 7	Delete: "overpack" Add: "lab pack"
A	10	A.4.5.1	Paragraph 1 Lines 3, 4 and 8	Delete: "overpack" Add: "lab pack"
A	10	A.4.5.2	Paragraph 1 Lines 7 and 8	Delete: "and the isolation of these operations when they do occur"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
A	10	A.4.6	Paragraph 1 Lines 2 and 3	Delete: "split" and "labpack" Add: "divided" and "commercial chemical"
A	10	A.4.6.1	Section Title	Delete: "lab pack" Add: "Uncomposted commercial chemical" and "waste"
A	10	A.4.6.1	Paragraph 1 Lines 3 and 4	Delete: "overpack" Add: "lab pack" and "organic and inorganic wastes that are compatible are lab packed together"
A	11	A.4.6.1	Paragraph 1 Lines 1 and 2	Delete: "overpack" Add: "Lab pack"
A	11	A.4.6.2	Section Title	Add: "Process Waste"
A	11	A.4.6.2	Paragraph 2 Lines 3 through 5	Delete: The sentence referring to process knowledge of metal.
A	11	A.4.6.2	Paragraph 3 Line 2	Delete: "EP Toxic" Add: "TCLP"
A	11	A.4.6.2	Paragraph 3 Line 4	Delete: "organic" and "LDR" Add: "organics"
A	11	A.4.6.2	Paragraph 4 Line 1	Delete: "are" Add: "is"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
A	11	A.4.6.2	Paragraph 4 Line 6	Delete: "listed" Add: "TCLP"
A	11	A.4.6.2	Paragraph 5 Line 1	Add: "stream"
A	11	A.4.6.2	Paragraph 5 Lines 2 through 4	Delete: "it", "follow" and "pattern established" Add: "these wastes", "be characterized" "following" and "procedures described"
A	11	A.4.7	Paragraph 1 Line 7	Delete: "per" Add: "according to"
A	12	A.4.8	Paragraph 1 Line 2	Delete: "covered by" Add: "included in"
A	12	A.4.9	Paragraph 1 Lines 3 and 4	Delete: "waste" Add: "wastes" and "Waste"
A	12	A.4.9	Paragraph 2 Line 4	Add: "liquid waste"
A	12	A.4.9	Paragraph 2 Lines 5 and 6	Delete: "discussed" and "procedure" Add: "discuss" and "procedures"
A	12	A.4.9	Paragraph 2 Line 10	Add: "40 CFR"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
A	12	A.4.9	Paragraph 2 Line 12	Add: "a"
A	12	A.4.9	Paragraph 2 Line 16	Add: "liquid waste"
A	12	A.4.9	Paragraph 3 Lines 2 and 3	Delete: "EP toxic", "established" and "to be present" Add: "TCLP" and "found to be present"
A	12	A.4.9	Paragraph 3 Line 7	Delete: "EP toxic" Add: "TCLP"
A	13	A.4.10	Paragraph 2 Line 2	Delete: "LANL" Add: "the Laboratory"
A	13	A.4.10	Paragraph 2 Line 4	Delete: "which"
A	13	A.4.10	Paragraph 2 Line 5	Delete: "test if" and "is hazardous" Add: "that" and "analyze"
A	13	A.4.10	Paragraph 3 Line 6	Delete: "limit" and "actually" Add: "volume", "limitation"
A	13	A.4.10	Paragraph 3 Line 7	Add: "entirely"
A	13	A.4.10	Paragraph 3 Lines 3 and 4	Delete: "EP Toxic" Add: "TCLP"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
A	13	A.4.10	Paragraph 3 Lines 6 and 7	Delete: "Hazardous Waste" Add: "hazardous waste code"
A	26	A.5	Paragraph 1 Lines 1 through 3	Add: entire section on "Verification Analysis"
A	26	A.5.1	Paragraph 3 Lines 1 and 2	Delete: "Lab pack" and "which" Add: "Unused commercial", "that" and "declared a hazardous waste"
A	26	A.5.2	Paragraph 1 Lines 2 and 3	Add: "that have documented waste"
A	26	A.5.2	Paragraph 1 Line 3	Delete: "annually" Add: "profiles", "annually" and "that"
A	26	A.5.2	Paragraph 1 Lines 4 and 5	Delete: "the" twice and "and" Add: "that which", "a" and "that"
A	26	A.5.3	Paragraphs 1 through 4	Delete: paragraphs 1 through 4
A	27	A.5.3	Paragraph 5	Delete: equation

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
B	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: A "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>
B	1	B.1	Section Title	Delete: "Batch Waste Treatment Unit and"
B	1	B.1	Paragraph 1 Line 3 and 4	<p>Delete: "batch waste treatment unit and" and "are"</p> <p>Add: "is"</p>
B	1	B.1.1	Paragraphs 1 and 2	Delete: the entire section except for Paragraph 1 Line "The modular..."
B	2	B.1.2	Paragraph 1 through 3	Delete: paragraphs 1 through 3
B	3	B.1.2	Paragraph 1, 2 and 6	Delete: Paragraphs 1, 2 and 6.
B	4	B.1.2		Delete: Paragraph 1

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
B	4	B.1.3		Delete: entire section
B	12	Table B-1	Section Title	Delete: Section referring to the "Batch Waste Treatment Unit"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
C	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: A "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>
C	2	C.2.2	Paragraph 1 Line 1	<p>Delete: "handler" Add: "Handling"</p>
C	2	C.2.3	Paragraph 1 Line 4	<p>Delete: "training program"</p>
C	2	C.2.4	Paragraph 1 Line 3	<p>Delete: "Associate" and "HSE Division" Add: "EM Division"</p>
C	3	C.3	Paragraph 1 Lines 2 and 3	<p>Delete: "Hazardous Waste Emergency Coordinator (HWEC)" Add: "Incident Commander (IC)"</p>

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
C	7	RCRA Job Description	Section A Paragraph 2 Line 1	Add: "Good"
		#003	Section B Paragraphs 4 - 6	Delete: "or SCBA", "a. Explosives/ Reactives", "b. Acids/Bases", "c. Organics General", and "d. Inorganics General" Add: " Protection", and "and Mixed"
			Paragraph 8	Delete: "RCRA"
	8		Section C Paragraph 3	Delete: "and batch waste treatment system"
			Paragraph 5	Add: "and mixed"
			Paragraph 10	Add: "Provide personnel for emergency response."
C	14	RCRA Job Description	Section A Paragraph 1 Lines 1 and 2	Delete: "RCRA listed hazardous materials and waste" Add: "hazardous and mixed materials and waste.",
		#009	Paragraph 4	Delete: "chemical" Add: "hazardous and mixed"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
C	14	RCRA Job Description #009 (continued)	Section B Paragraphs 3 through 6	Delete: "Personal", Respirator or SCBA" "a. Explosives/Reactives", "b. Acids/Bases", "c. Organics General", "d. Inorganics General" and Add: "Personnel", "Respiratory Protection" and "Mixed"
			Paragraph 8	Delete: "RCRA" Add: "hazardous and mixed"
	15		Section C Paragraph 2	Add: "storage"
			Paragraph 3	Delete: "and batch waste treatment system." Add: "and emergency" and "and mixed"
C	20	RCRA Job Description #012	Title	Delete: "HSE" Add: "EM"
			Section A Paragraph 2 Line 1	Add: "and mixed"
			Section B Paragraph 3 & 4	Delete: "Personal", Respirator or SCBA" Add: "personnel" and "Respiratory Protection"
			Paragraph 6	Delete: "RCRA"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
C	20	RCRA Job Description #12 (continued)	Section B Paragraph 9 Lines 2 through 5	Delete: "a. Explosives/Reactives", "b. Acids/Bases", "c. Organics General, and" "d. Inorganics General"
			Section C Paragraph 1	Delete: "chemical" Add: "hazardous/mixed"
			Paragraph 7 Line 1	Add: "or emergency"
C	47	RCRA Job Description #038	Title	Delete: "Responder" Add: Manager/Hazardous Material Response Team"
			Section A Paragraph 1 Lines 1 and 2	Add: "and mixed"
			Paragraph 4 Line 1	Delete: "proper chemical" Add: "hazardous and mixed"
			Section B Paragraph 2	Add: "OSHA Provisions"
			Paragraph 5	Add: "Emergency Response"
		Section C Paragraph 1	Delete: "To" and "an emergency response coordinator" Add: "Incident Commander"	

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
C	51-53	RCRA Job Description Personnel List		Add: New updated list of RCRA personnel contained in pages 51 through 53
C	54-67	RCRA Job Description Personnel List		Delete: Old list of RCRA personnel contained in pages 54 through 67
C	69	Outline of Training Program	Section IV	Delete: Part A referring to the Batch Waste Treatment (OJT)
		Reletter Part B to reflect above deletion of Part A		Delete: "B" Add: "A"
		Reletter Part C to reflect above relettering of Part B		Delete: "C" Add: "B"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
D	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: A "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>
D	6	D.2.3	Paragraph 4 Line 3	Add: "(30-6- miles)"
D	6	D.2.3	Paragraph 4 Line 7	Add: 470-2657
D	9	D.4.2.1	Table D-2 Bottom of Page	Delete: illegible handwritten note
D	31	Table D-3		Delete: entire page referring to the Emergency equipment for the Batch Waste Treatment unit which is closed.
D	32	Table D-3		Delete: entire page referring to the Emergency Equipment for the Batch Waste Treatment unit which is closed.

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
D	42	Table D-3		Delete: Manpower section on this page.

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
E.1	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: of a "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
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ATTACHMENT E.2	DELETED	DUE TO THE CLOSURE OF THE BATCH WASTE TREATMENT UNIT.		
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Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
E.3	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: of a "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
E.4	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: of a "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
E.5	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: of a "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
E.6	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: of a "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
E.7	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: of a "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
E.8	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: of a "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>
E.8	1		Attachment Title	Add: "Partial Closure"
E.8	1	E.8.	Title	Add: "Partial"
E.8	1	E.8.1.	Paragraph 1 Line 2	Delete: "Four" Add: "Two"
E.8	1	E.8.1.	Paragraph 1 Line 3	Add: "will be closed"
E.8	1	E.8.1.	Paragraph 1 Line 7	Delete: "these" Add: "the two" and "indicated (Figure E.8.2)."
E.8	1	E.8.1.	Paragraph 2 Line 3	Delete: "two" Add: "six"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
E.8	1	E.8.2.	Paragraph 1 Line 3	Delete: "6,640" Add: "3,320"
E.8	1	E.8.2.	Paragraph 1 Line 4	Delete: "5,720" Add: "2,860"
E.8	2	E.8.4.	Paragraph 1 Line 2	Delete: "Should a single tank be closed"
			Line 3	Add: "Partial closure will consist of"
			Line 3	Delete: "all" Add: "closing two of the existing four tanks." and "All"
			Line 5	Delete: "tank" Add: "of two" and "tanks"
E.8	2	E.8.5.2.	Paragraph 1 Lines 2 and 3	Add: "two" to both lines
E.8	3	E.8.5.2.	Paragraph 1 Lines 3 and 13	Add: "two" to both lines
E.8	3	E.8.5.3.	Paragraph 1 Lines 2 through 4 and 6 through 8	Modify these lines to reflect partial closure of the tanks.
E.8	4	E.8.5.4.	Paragraph 1 Lines 4 and 5	Delete: "HSE" Add: "HR"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
E.8	4	E.8.5.5.	Paragraph 1 Line 10	Delete: "to" Add: "is"
E.8	5	E.8.6.1.2	Paragraph 1 Line 3	Delete: "Director" Add: "Secretary"
E.8	5	E.8.7.	Paragraph 1 Line 2	Delete: "2100" Add: "1994" change year of closure.
E.8	5	E.8.7.	Paragraph 1 Line 7	Delete: "360" Add: "210" change time required for closure.
E.8	5	E.8.8.	Paragraph 1 Line 2	Delete: "the" Add: "of the two tanks"
E.8	6	E.8.8.	Paragraph 1 Line 3	Delete: "facility has" Add: "two tanks have been"
E.8	6	E.8.8.	Paragraph 1 Line 5	Delete: "Director" and "NMEID" Add: "Secretary" and "NMED"
E.8	6	E.8.8.	Paragraph 1 Line 7	Delete: "HSE" Add: "ES"
E.8	12	E.8.11.	Paragraph 1 Line 3	Delete: "Director" Add: "Secretary"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
E.8	14	Table E.8.1		Modify the table to reflect the changes in the closure schedule and activities caused by partial closure.
E.8	15	Table E.8.2	Analytical Parameters	Delete: "Organics" in two places. "organochlorine pesticides", "Chlorinated herbicides", "Phenols", "Extraction Procedures Toxicity" in two places. "Cyanide" Add: "Cyanides", "Toxic Characteristic Leaching Procedure (TCLP)" and "using TCLP"

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
E.9	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: of a "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
F	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: A "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>
F	1	F.1.1.	Paragraph 1 Line 4	<p>Delete: "Form H-1" Add: "Form 10-3A"</p>
F	1	F.1.1.	Paragraph 4 Lines 4 and 5	<p>Delete: "either" and "three ton or one ton flat bed truck" Add: "Half-ton to twelve-ton truck"</p>

Attachment	Page(s)	Section	Paragraph/Line	Description of Modification
I	All			<p>Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.</p> <p>Add: A "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.</p> <p>Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.</p>

Attachment Page(s) Section Paragraph/Line

J All

Description of Modification

Add: A "Header" at upper right corner of the page to identify the Permit that the page belongs in and the date the page was modified.

Add: A "footer" on every page to identify where the page belongs and which page number it is of the total number of pages.

Renumbering of all pages to reflect the changes in pagination caused by addition of "headers" and "footers" throughout the Module.

ENCLOSURE 2
LIST OF REQUESTED MODIFICATIONS
NOT MADE TO THE LANL HAZARDOUS WASTE PERMIT

REQUESTED MODIFICATION	REASON FOR DISAPPROVAL/DELAY OF INCORPORATION
1. LANL has requested a modification on Page 17 to Section H.3.c that changes the definition of On-Site.	<p>NMED will not modify the definition of on-site as requested by LANL. NMED has modified the Permit at Module II Section B.2. to allow some specific off-site location waste to be brought on-site. See Module II Page 1 at B.2.</p> <p>LANL must apply for and receive a provisional EPA number for each shipment of waste from the approved sites in Module II Table 1.</p> <p>NMED has compiled Module II Table 1 to specifically identify off-site PRS/SWMU sites that may have IDW/RW brought on-site. See Module II Table 1</p>
2. LANL has requested modification to reflect LANL's proposed definition of on-site.	<p>This modification is disapproved. See number 1 above.</p>
3. LANL has requested modification on Page 25 eliminating the restrictions on the movement of "Hazardous Waste", stating that DOT regulations are more stringent and protective of human health and the environment during transportation.	<p>NMED denies the requested modification because DOT regulations are not more stringent than Section II.M of the Permit.</p>

REQUESTED MODIFICATION

4. LANL has requested a modification on Page 54 to Figure 6. LANL wishes to replace old Figure 6 with new figure 6.
5. LANL has requested a modification on Page 55 to Figure 10. LANL wishes to replace old Figure 10 with new Figure 10.
6. LANL has requested a modification by the addition of building 54-70 "and three new modular buildings."

REASON FOR DISAPPROVAL/DELAY OF INCORPORATION

NMED is not in receipt of the "New Figure 6"
LANL must submit a "New Figure 6" within 10 days of the receipt of this correspondence.
NMED reserves the right to disapprove this modification if Figure 6 is not approved.

NMED is not in receipt of the "New Figure 6"
LANL must submit a "New Figure 6" within 10 days of the receipt of this correspondence.
NMED reserves the right to disapprove this modification if Figure 10 is not approved.

NMED is not in receipt of the structure numbers for the "three new modular buildings".

Building 54-70 has been added to the permit.

LANL must submit to NMED the structure numbers for the "three new modular buildings" along with a description of how the three new modular buildings will be used in the waste segregation and characterization process at TA-54 Area L before these "three new buildings" become incorporated into the permit. **This information must be submitted within 10 days of receipt of this correspondence.**

REQUESTED MODIFICATION

REASON FOR DISAPPROVAL/DELAY OF INCORPORATION

7. LANL has requested a modification by the addition of language justifying the Barium Sands Truck Mounted Container Treatment System and its addition to the waste treatment process at LANL.

NMED is not in receipt of Attachment L referred to in the modification request. Before this modification is incorporated NMED must review Attachment L. **LANL must submit Attachment L within 10 days of the receipt of this correspondence.**

8. LANL has requested modification by addition of language identifying the closure requirements for the Barium Sands Truck Mounted Container Treatment System.

NMED is not in receipt of the language that LANL wishes to be incorporated in the Permit. NMED must be given sufficient opportunity to review the language that LANL proposes. **LANL must submit the proposed language within 10 days of the receipt of this correspondence.**

9. LANL has requested modification by the addition of information describing the Inspection/Reporting procedures for the Barium Sands Truck Mounted Container Treatment System (BSTMCTS)

NMED is not in receipt of the language proposed by LANL describing the Inspection/Reporting procedures for the BSTMCTS. Therefore this modification will not be incorporated into the permit until NMED has had sufficient opportunity to review the proposed language of this modification. **LANL must submit the proposed language within 10 days of the receipt of this correspondence.**

LANL must also submit to NMED the following information within 10 days of the receipt of this correspondence:

A. Design characteristics of the Barium Sand Truck-Mounted-Container Treatment System.

REQUESTED MODIFICATION

9. Comment Continued on Barium Sands Truck Mounted Container Treatment System Information Requirements.
10. LANL has requested modification by adding a description of the Barium Sands Truck Mounted Container Treatment System operating location in Attachment L to their Permit.
11. LANL has requested a modification to reflect the change in number of Barium Sands Treatment Tanks and Barium Sand Truck-Mounted-Container Treatment System at TA-54 Area L.

REASON FOR DISAPPROVAL/DELAY OF INCORPORATION

- B. Operational Requirements of the Barium Sand Truck-Mounted-Container Treatment System.
- C. Information describing response to spills, or leaks from the Barium Sand Truck-Mounted-Container Treatment System.

NMED is not in receipt of Attachment L. Attachment L must be received and reviewed by NMED prior to incorporation of this modification.

LANL must submit Attachment L within 10 days of the receipt of this correspondence.

NMED has modified the Permit to reflect the change in the number of steel tanks. The language adding the "Barium Sands Truck -Mounted-Container Treatment System" and specifying its operating location will not be incorporated until NMED has had a chance to review all Barium Sand Truck-Mounted-Container Treatment System Documents including the required modifications to Attachment E.8 (Closure Plan) to reflect closure of the Barium Sand Truck-Mounted -Container Treatment System. **LANL must submit to NMED the modified Attachment E.8 within 10 days of the receipt of this correspondence.**

REQUESTED MODIFICATION

12. LANL requested modification to the Permit Attachment C on Page 3 Section C.3 changing the name of the "Emergency Coordinator" that is required by regulations at 40 CFR § 264.52 to "Incident Commander".
13. LANL submitted a list of information that was to be included in the modification made to Module I at I.D.7.a. items 1 through 7.

REASON FOR DISAPPROVAL/DELAY OF INCORPORATION

NMED delays incorporation until LANL provides written documentation demonstrating that the duties are the same for both titles. **LANL must submit this documentation within 10 days of the receipt of this correspondence.**

The following items were requested but not included in this modification because NMED must review each of the following to determine that the modification does not make the form/list less comprehensive.

1. All class I Permit Modifications listed in Appendix I of 40 CFR § 270.42.
2. Changes in the Chemical Waste Disposal Form.
3. Changes in the Waste Profile Form.
4. Changes in the Inspection Form.
5. Changes to the PRS/SWMU List in Module II Table 1 of the Permit.