

Los Alamos National Laboratory

ENVIRONMENTAL RESTORATION

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U. S. Department of Energy
Los Alamos Area Office, MS A316
Los Alamos, New Mexico 87544
505-665-7203
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Date: **MAR 27 1995**
Refer to: EM/ER:95-075

Mr. William Honker
RCRA Permits Branch
Hazardous Waste Management Division
U.S. Environmental Protection Agency
1445 Ross Ave., Suite 1200
Dallas, TX 75202-2733

Dear Mr. Honker:

SUBJECT: REQUEST FOR PERMIT MODIFICATION

In accordance with 40 CFR 270, et. seq., the Department of Energy and the University of California/Los Alamos National Laboratory (Laboratory) request a Class I and a Class III permit modification to the Hazardous and Solid Waste Amendments Module VIII of their Resource Conservation and Recovery Act (RCRA) permit.

According to the direction of Ms. Barbara Driscoll of your staff, we are adding 23 solid waste management units (SWMUs) to the permit under a Class I permit modification. Also included are changes proposed to correct transcription and/or typographical errors. The Attachment to this letter contains a list of these SWMUs.

The requested Class III modification is to remove 89 SWMUs from the permit. The removed units have been investigated and recommended for no further action in the 20 RCRA facility investigation work plans that have been reviewed by your office to date. Ms. Driscoll agrees and concurs with the determination that a Class III permit modification request is the appropriate vehicle to request removal of these units from the permit. Appendices B and C of the enclosed no further action request reflect the additions made under the Class I permit modification request.

Enclosed please find two hard copies and one disk copy in WordPerfect of the permit modification request to add 23 SWMU's and to remove 89 SWMUs. For information purposes only, this permit modification request also contains 278 areas of concern which have been reviewed by your office. Also enclosed are the Attachment containing the list of 23 SWMUs to be added to the permit and a certification statement signed by the designee owner and operator for the Laboratory.

The facility will publish a notice of the modification request in the local newspapers and send notices to all persons on the facility mailing list, which will contain, at a minimum, all information as prescribed in 40 CFR 270.42.



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CERTIFICATION

I certify under penalty of law that these documents and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violation.

Document Title:

Class III Permit Modification for Removal of 89 Solid Waste Management Units (SWMUs)

Name:

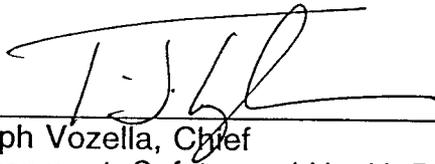


Dennis Erickson
Division Director
Los Alamos National Laboratory

Date:

3/2/95

Name:



Joseph Vozella, Chief
Environment, Safety, and Health Branch
DOE-Los Alamos Area Office

Date:

3/27/95

or

Theodore J. Taylor
Program Manager
Environmental Restoration Program
DOE-Los Alamos Area Office

Mr. Honker
EM/ER:95-075

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If you have questions regarding this matter, please call Dave McInroy at 505-667-0819 or Court Fesmire at 505-665-4718 of our staff.

Sincerely,



Jorg Jansen, Project Manager
Environmental Restoration

Sincerely,



Theodore J. Taylor, Program Manager
Environmental Restoration Program

JJ/TT/hp

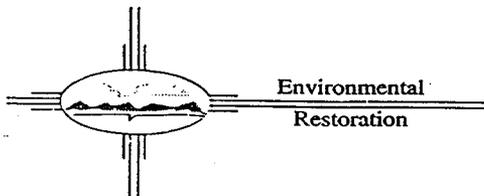
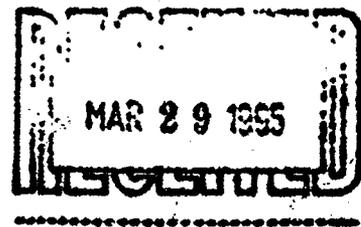
Enclosures: (1) Request for Permit Modification, Units Proposed for NFA
(2) Disk Copy of Document in WordPerfect
(3) Attachment
(4) Signed Certification Form

Cy (w/enc.):

J. Brown, FSS-16, MS F674
H. Decker, NMED-AIP, MS J993
C. Fesmire, DOE/LAAO, MS A316
B. Garcia, NMED, 1190 St. Francis Dr., P.O. Box 26110, Santa Fe, NM 87502
D. Griswold, ERD, AL, MS A906
E. Merrill, EM-453, HQ
T. Taylor, LAAO, MS A316
J. White, ESH-19, MS K498
RPF, MS M707

Cy (w/o enc.):

T. Baca, EM, MS J591
B. Barnett, CIC-1, MS M773
T. Glatzmaier, EES-DO/ER, MS M992
K. Hargis, EM, MS J591
J. Jansea, EM/ER, MS M992
D. McInroy, EM/ER, MS M992
G. Rael, ERD, AL, MS A906
W. Spurgeon, EM-453, HQ
J. Vozella, LAAO, MS A316
CIC-10, MS A150
EM/ER File, MS M992
File # 1.4.2.6.1.7.1.2, LAAO, MS A316



Attachment

LANL Class I Permit Modifications

SWMU Additions

- SWMU No. 0-039 should be added to Table A, according to new SWMU notification in July 1994.
- SWMU Nos. 36-004(d) and C-36-003 should be added to Table A, according to NOD comments.
- The following SWMUs should be added to Table C, according to NOD comments:

16-015(a,b)
16-024(e)
16-029(a2)
16-029(c2-e2)
16-029(h2)
16-029(m-p)
16-029(r)
16-029(w)
16-029(y,z)
16-032(a)
16-032(c)
C-16-025
C-16-026

Changes to correct transcription and/or typographical errors

- SWMU No. 22-010(c) needs to be changed to 22-010(b) in Table A.
- SWMU No. 16-025(s) needs to be changed to 16-026(s) in Table C.
- SWMU No. 3-009(c) appears in Table A and Table C. It needs to be removed from Table C.
- ✓ SWMU No. 3-029(a) was changed to 60-005(a). Table B needs to be revised to delete 3-029.
- SWMU No. 9-008(a) is not identified in Table A and appeared in Table B as a typographical error. It needs to be removed from table B.