

## MEMORANDUM

To: Barbara Hoditschek, Program Manager  
From: Robert S. (Stu) Dinwiddie  
Date: May 8, 1996  
RE: LANL Priority List

In reference to our brief meeting on May 7, 1996 I have prepared the following list of "Permitting Priorities" for LANL.

The fact that the following priority list indicates numbers 1 through 6 does not indicate any work in the town site does not indicate Permitting Program wishes work in the town site to take a back seat to the projects listed below. Projects below are to be completed along with and in addition to town site cleanup which permitting section would like to see completed by the end of FY-99.

### **Environmental Restoration:**

1. Finish **all 8** Canyon Work Plans by the end of FY-98. Historically LANL has pushed back this project for the completion of lower priority projects "due to budget cuts". Both Permitting Section and Technical Section consider these work plans to be a "**very high priority**" under RCRA, HSWA, and EPCRA.
2. Complete RFI Reports and site characterization for all of TA-54 by the end of FY-98. Lack of complete knowledge for MDA-G and MDA-L as well as pit and shafts (retrievable storage and disposal).
3. Complete **all** work and reports on TA-49, MDA-AB by FY-98.
4. Complete **all** work and reports on **all** TA-21 MDAs and Outfalls by the end of FY-98.
5. Complete **all** work and reports on **all** TA-50 MDAs and Outfalls by the end of FY-98.
6. Complete **all** work and reports on TA-18 by the end of FY-98.

Items 1 through 6 are what I consider the highest priority projects for permitting. Low priority and possible some medium priority PRS/SWMU/AOCs should be used for VCA/EC projects.

### **Waste Management/Operations:**

My records indicate that there are approximately 80 "interim status" units at LANL. Most of these units are mixed waste and do not have a "drop dead date" for Part B submittals in order to



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retain "interim Status". Permitting Program has set the following priority list for the inclusion of all units that should be permitted into the LANL RCRA Permit by the time the existing permit is reissued in the year 1999. That means all of the below projects and permitting of all units now existing at LANL should be complete by the end of FY-99 and entire project completed with the Permit Re-issuance in late 1999 or early 2000.

Priority list does not include items scheduled to be received in FY-96 such as TA-16 Permit application or the TA-55 Permit application.

Items and Priority:

1. Call in and complete a closure plan for TA-14 Surface Impoundment.
2. Call in Part A and B Applications for the Open Burn Unit in TA-14 or a closure plan for that unit and incorporate open burning operations in TA-14 with Open Burning Operations in TA-15 or TA-16. Complete Permit by end of FY-99.
3. Call in and complete closure plan for TA-15 Surface Impoundment.
4. Call in Part A and B Applications for the Open Burn/Open Detonation Units in TA-15. Complete Permit by the end of FY-99.
5. Call in Part A and B Applications for Open Burn/Open Detonation Units in TA-36. Complete Permit by the end of FY-99.
6. Call in Part A and B Applications for Open Burn/Open Detonation Units in TA-39. Complete Permit by the end of FY-99.
7. Part A and B Applications for the permitting or submittal of a closure plan for Container storage units in TA-03. Complete whichever action by the end of FY-99.
8. Part B application for the permitting or submittal of a closure plan for Container storage units in TA-22. Complete whichever action by the end of FY-99.

These activities plus activities currently in house or with deliverable dates in FY-96 will address those concerns of EPA and "non permitted units".