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6/17/98  
Permit

RED LANL

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

February 5, 1998

Mr. Theodore Taylor, Program Manager  
Los Alamos Area Office  
Department of Energy  
528 35th Street  
Los Alamos, New Mexico 87544

Dr. James C. Brown, Director  
Los Alamos National Laboratory  
P.O. Box 1663, Mail Stop A100  
Los Alamos, New Mexico 87545

**RE: Proposed Permit Strategy  
Los Alamos National Laboratory  
NM0890010515**

Dear Mr. Taylor and Dr. Brown:

1997

The RCRA Permits Management Program (RPMP) of the Hazardous and Radioactive Materials Bureau (HRMB) is responding to the December 22, 1998 letter regarding the proposed permit strategy for the reissuance of the Department of Energy/ Los Alamos National Laboratory (DOE/LANL) Resource Conservation and Recovery Act (RCRA) Operating Permit. Several discussions and letters were held between HRMB and DOE/LANL regarding the form of the current LANL RCRA permit and the reissuance strategy. The RPMP and DOE/LANL discussed this strategy at the last NMED/LANL Waste Management Monthly meeting, January 22, 1998, to continue efforts in providing a manageable document for all. The RPMP and DOE/LANL agree that the discussed strategy is appropriate in managing such a large and complex facility such as LANL.

The reissuance of the DOE/LANL permit will be structured to provide a comprehensive but



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Mr. Taylor and Dr. Browne  
February 5, 1998  
Page 2

manageable document (see attached outline scheme). A General Part A will cover all of the mixed waste and hazardous waste units at the facility. The General Part B will be an umbrella document covering all of the common elements of the permit at each Technical Area (TA). Underlying the General Part B will be the TA specific unit Part B permits. These TA-specific Part B permits will cover any details not addressed in the General Part B and also provide additional requirements that vary from the facility General Part B. Modules within the TA-specific permit will provide descriptions and operations of each unit within the TA.

Upon the issuance of a TA-specific permit it will endure for the 10 year permit period pursuant to RCRA. Each TA-specific Part B will have its own 10 year permit period. During the issuance or renewal of a TA-specific permit the facility General Part A and Part B permits will also be examined for compliance. If a permit expires without renewal it may be removed without rewriting or renewing General Part B permit.

If you have questions concerning this letter, please contact myself or Mr. John Kieling, RPMP's LANL Facility Manager at (505) 827-1561.

Sincerely,



Robert S. (Stu) Dinwiddie, Ph.D., Manager  
RCRA Permits Management Program  
Hazardous and Radioactive Materials Bureau

RSD:jek

cc: B. Garcia, NMED HRMB  
J. Kieling, NMED HRMB  
S. Kruse, NMED HRMB  
H. LeDoux, DOE LAAO, MS A316  
D. Neleigh, EPA, 6PD-N  
J. Plum, DOE LAAO, MS A316  
File: RED LANL G/P '98  
Track: LANL, 2/5/97, na, DOE/LANL, HRMB/Dinwiddie, RE, File

Attachment

Proposed DOE/LANL permit strategy format for reissuance:

- Chapter 1        EPA ID#    General Part A - Includes mixed and hazardous waste
- Chapter 2        EPA ID#    General Part B - Covers common operations for entire facility
  - Appendix A - Waste Analysis Plan
  - Appendix B - Inspection Plan
  - Appendix C - Personnel Training
  - Appendix D - Contingency Plan
  - Appendix E - Closure Plan
  - Appendix F - Container Management
  - Appendix G - Authorized Waste
  - Appendix H - Incinerator Operational Safety
  - Appendix I - Hazardous Waste Management Regulations
  - Appendix J - etc...
  
- Chapter 3        EPA ID#    HSWA Permit
- Chapter 4        EPA ID# - 03    TA-3 Specific Part B - Mixed Waste Container Storage
  - Module 1 - General TA Conditions
  - Module 2 - Specific TA Conditions
  - Module 3 - Container Storage
    - 3.1 Hazardous Waste Container Storage
    - 3.2 Mixed Waste Container Storage
  - Attachment 1 - General TA Description
  - Attachment 2 - TA-3 Inspection Plan
  - Attachment C - TA-3 Personnel Training
  - Attachment D - TA-3 Contingency Plan
  - Attachment E - TA-3 Closure Plan
  - Attachment F - TA-3 Container Management
  - Attachment G - TA-3 Authorized Waste
  - Attachment J - etc...
  
- Chapter 5        EPA ID# - 14    TA-14 Specific Part B - Open Detonation, Container Storage
  - Module 1 - General TA Conditions
  - Module 2 - Specific TA Conditions
  - Module 3 - Container Storage
    - 3.1 Hazardous Waste Container Storage
    - 3.2 Mixed Waste Container Storage
  - Module 4 - Subpart X Unit(s)
  - Attachment 1 - General TA Description
  - Attachment 2 - TA-3 Inspection Plan
  - Attachment C - TA-3 Personnel Training
  - Attachment D - TA-3 Contingency Plan
  - Attachment E - TA-3 Closure Plan
  - Attachment F - TA-3 Container Management
  - Attachment G - TA-3 Authorized Waste
  - Attachment J - etc...
  
- Chapter 6        EPA ID# - 15    TA-15 Specific Part B - Open Detonation, Container Storage  
Modules and Attachment...

Mr. Taylor and Dr. Browne  
February 5, 1998  
Page 4

- Chapter 7      EPA ID# - 16 TA-16 Specific Part B - Industrial Incinerator, Open Burn Unit, Mixed Waste Container Storage  
                  Modules and Attachment...
- Chapter 8      EPA ID# - 36    TA-36 Specific Part B - Open Detonation  
                  Modules and Attachment...
- Chapter 9      EPA ID# - 39 TA-39 Specific Part B - Open Detonation  
                  Modules and Attachment...
- Chapter 10     EPA ID# - 50    TA-50 Specific Part B - Mixed Waste and Hazardous Waste Container Storage, Treatment Tanks  
                  Modules and Attachment...
- Chapter 11     EPA ID# - 54G TA-54 Area G Specific Part B - Mixed Waste Container Storage, Landfill  
                  Modules and Attachment...
- Chapter 12     EPA ID# - 54H TA-54 Area H Specific Part B - Landfill  
                  Modules and Attachment...
- Chapter 13     EPA ID# - 54J TA-54 Area J Specific Part B - Landfill  
                  Modules and Attachment...
- Chapter 14     EPA ID# - 54L TA-54 Area L Specific Part B - Landfill  
                  Modules and Attachment...
- Chapter 15     EPA ID# - 55 TA-55 Specific Part B - Mixed Waste Container Storage, Mixed Waste Tank Storage  
                  Modules and Attachment...
  
- Chapter 16     etc...