



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau  
2044 A Galisteo Street  
Santa Fe, New Mexico 87505  
Telephone (505) 827-1557  
Fax (505) 827-1544



PETER MAGGIORE  
SECRETARY

PAUL R. RITZMA  
DEPUTY SECRETARY

REP LANL GIP/2000

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

November 20, 2000

Dr. John Browne, Director  
Los Alamos National Laboratory  
Post Office Box 1663, MS A100  
Los Alamos, NM 87545

Mr. David A. Gurule, Area Manager  
Los Alamos Area Office  
Department of Energy  
528 35<sup>th</sup> Street, MS A316  
Los Alamos, NM 87544

**RE: ADMINISTRATIVE COMPLETENESS DETERMINATION  
PART A AND GENERAL PART B RCRA PERMIT APPLICATION  
LOS ALAMOS NATIONAL LABORATORY  
EPA ID NO. NM 0890010515**

Dear Dr. Browne and Mr. Gurule:

The Hazardous Waste Bureau (HWB) has reviewed for administrative completeness the above-referenced Resource Conservation and Recovery Act (RCRA) Application, in accordance with 20.4.2.201.3.1 NMAC. The Application reviewed consists of the following: the General Part A Permit Application, Revision 0.0, dated April, 1998, and Revision 0.0/1.0/2.0, dated July, 2000; the General Part B Permit Application, Revision 1.0, dated October, 1998; and the Hazardous and Solid Waste Amendments (HSWA) Information Package, dated September, 1999.

HWB has determined the Application to be incomplete. The information that must be included in order for the Application to be considered complete is described in Attachment A. The information is required to be submitted in accordance with 40 CFR § 270.13 and § 270.14 (incorporated at 20.4.1.900 NMAC).

This is a final administrative completeness determination. The information requested by this letter supplements the following information requests and responses: 1) Request for Supplemental Information; General Part A Permit Application, Revision 0.0, from Robert S. Dinwiddie to G. Thomas Todd and John C. Browne, dated June 18, 1998; 2) Response to



15886

TK

November 20, 2000

Page 2

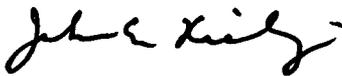
Request for Supplemental Information (RSI), General Part A Permit Application, Revision 0.0, from H. L. Plum to Robert S. Dinwiddie, dated July 22, 1998; 3) Request for Supplemental Information for the October 1998, General Part B Permit Application, Revision 1.0, from John Kieling to John Browne and David Gurule, dated March 29, 2000; 4) LANL Response to the RSI for the October 1998 General Part B Permit Application, Revision 1.0, from David Gurule to John Kieling, dated June 29, 2000; 5) draft unsigned Request for Supplemental Information for the Technical Review of the May 12, 1999 [sic], General Part B Permit Application, Revision 1.0, from John Kieling to John Browne and David Gurule, dated July 7, 2000; and 6) three-ring bound draft Response to Request for Supplemental Information for the October 1998 General Part B Permit Application, Revision 1.0, dated August 2000.

After the Application is determined to be administratively complete, a Request for Supplemental Information (RSI) will be issued by HWB in accordance with 20.4.2.201.3.2 NMAC, addressing all unresolved technical adequacy deficiencies.

The information requested in Attachment A shall be submitted to HWB within 60 days of receipt of this letter.

If you have any questions please contact Carl Will of my staff at 505-827-1561, extension 1031.

Sincerely,



John E. Kieling, Manager  
Permits Management Program

Attachment

cc: J. Bearzi, NMED HWB  
S. Dinwiddie, NMED HWB  
C. Will, NMED HWB  
P. Allen, NMED HWB  
D. Neleigh, EPA, 6PD-N  
J. Ellvinger, LANL ESH-19, MS K490  
J. Canepa, LANL EM/ER, MS M992  
M. Kirsch, LANL EM/ER, MS M992  
D. McInroy, LANL EM/ER, MS M992

file: reading and LANL red 2000

**REQUEST FOR ADDITIONAL INFORMATION:**

**ADMINISTRATIVE COMPLETENESS REVIEW  
RCRA PERMIT RENEWAL APPLICATION  
PART A AND GENERAL PART B  
LOS ALAMOS NATIONAL LABORATORY  
EPA ID NO. NM0890010515**

November 20, 2000

Submit the following:

**Part A**

Information on whether the Facility is located on Indian lands. [40 CFR § 270.13(f)]

Information on whether the Facility is new or existing and whether the Application is a first or revised Application. [40 CFR § 270.13(g)]

A description of hazardous debris to be treated, stored, or disposed of at the Facility. [40 CFR § 270.13(n)]

**General Part B**

A legible flood plain map. [40 CFR § 270.14(b)(11)(iii)]

Identify all units which are now or are anticipated to be subject to post-closure care requirements. The General Part B Application, Appendix F, Section F.1.9, states only that hazardous waste and constituents will be removed from container storage units unless indicated otherwise. Include information about closed and operating land disposal units. [40 CFR § 270.14(b)(13)]

Documentation of filing of post-closure notices, as required under 40 CFR § 264.119 (incorporated at 20.4.1.500 NMAC), for closed units, or a statement with explanation that there are no units currently subject to post-closure care requirements. [40 CFR § 270.14(b)(14)]

On a topo map meeting the requirements of 40 CFR § 270.14(b)(19) (incorporated at 20.4.1.900 NMAC), indicate the following:

- 1) surrounding land uses [40 CFR § 270.14(b)(19)(iv)];
- 2) points of compliance, monitoring wells, and contaminant plumes [40 CFR § 270.14(c)(3)].

Information to demonstrate compliance with other applicable Federal laws under 40 CFR §

270.3. Section 3.0 of the application only states that LANL has programs in support of these laws. [40 CFR § 270.14(b)(20)].

Notice of approval of exemption from or extension to Land Disposal Restrictions, in accordance with 40 CFR § 268.5 or § 268.6 (incorporated at 20.4.1.800 NMAC), if applicable, or a statement in the Application that no exemption or extension has been requested. [40 CFR § 270.14(b)(21)]

A list of regulated units under 40 CFR § 264.90(a)(2) and § 265.90, and groundwater monitoring data for regulated units meeting the requirements of 40 CFR § 270.14(c), §§ 265.90 through 265.94, and §§ 264.91 through 264.100, including the following: a summary of interim status groundwater monitoring data; identification of uppermost and hydraulically connected aquifers; description of contaminant plumes with 40 CFR Subpart 264, Appendix IX, constituent concentrations; and detailed plans and engineering reports on required groundwater monitoring programs, including, as required, a detection monitoring program in compliance with 40 CFR § 264.98 (incorporated at 20.4.1.500 NMAC), a compliance monitoring program in compliance with 40 CFR § 264.99 (incorporated at 20.4.1.500 NMAC), and a corrective action program in compliance with 40 CFR § 264.100 (incorporated at 20.4.1.500 NMAC). [40 CFR § 270.14(c)]

A list of and description of Solid Waste Management Units (SWMU's) at the Facility meeting the requirements of 40 CFR § 270.14(d) (incorporated at 20.4.1.900 NMAC), including a description of the SWMU, dates of operation of the SWMU, specification of wastes managed at the SWMU, information on any releases from the SWMU, and sampling results for groundwater, soil, surface water, and air. [40 CFR § 270(14)(d)]