



*Permit*

**State of New Mexico**  
**ENVIRONMENT DEPARTMENT**  
*Hazardous and Radioactive Materials Bureau*  
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**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

January 7, 2000

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

Mr. David A. Gurulé, Program Manager  
 Department of Energy  
 Los Alamos Area Office  
 528 35<sup>th</sup> Street, MS A100  
 Los Alamos, New Mexico 87544

**RE: REJECTION OF NOVEMBER 19, 1999 RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT MODIFICATION REQUEST NM0890010515**

Dear Dr. Browne and Mr. Gurulé:

The RCRA Permits Management Program (RPMP) of the Hazardous and Radioactive Materials Bureau of the New Mexico Environment Department has reviewed the Los Alamos National Laboratory (LANL) Permit Modification Request dated November 19, 1999 and found it to be unacceptable. The following items describe the substantial inadequacies of the permit modification request, and the minimum requirements for a permit modification request that is acceptable for review.

Regarding Appendix C - Inspection Plan, because the modification request refers to TA specific volumes, that are not part of the approved permit, this submittal is inadequate to replace the current Inspection Plan. Furthermore, every even-numbered page of this appendix is missing.

Regarding Appendix D - Personnel Training Plan, LANL presented a Bold/Strikeout version of the October 1999 General Part B Permit Application. This has nothing to do with this permit modification request. Actions regarding the General Part B application must be submitted under separate cover before RPMP's determination of administrative completeness. Furthermore, it



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appears that LANL is requesting to delete the job descriptions from the existing permit, effectively reducing its scope.

Regarding Appendix E - Contingency Plan, LANL neither describes sources nor hazardous waste units, as described in the existing permit section D.1.1 and Table D.1 respectively, effectively reducing the scope of the current permit.

If LANL wishes to re-submit this permit modification request, LANL shall submit a redline/strikeout version of the modified pages, and clean replacement pages. LANL shall also provide a tabular compilation and/or a narrative description of all requested permit modifications. This will allow timely and thorough review of this document.

Please contact Lee Winn at (505) 827-1558 extension 1029, if you have any questions.

Sincerely,

John E. Kieling  
Acting Program Manager  
RCRA Permits Management Program

JEK/lw

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