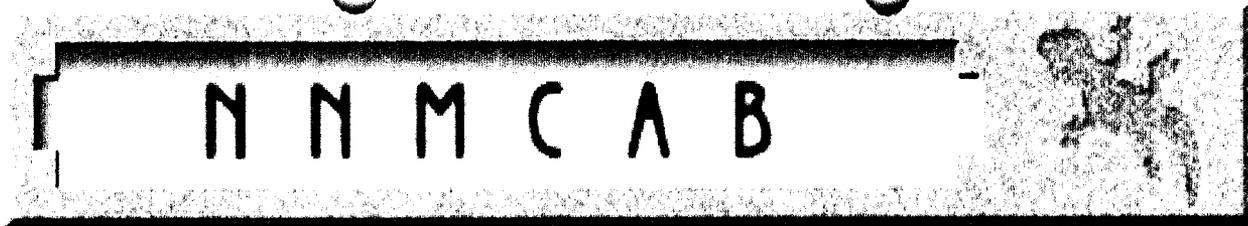


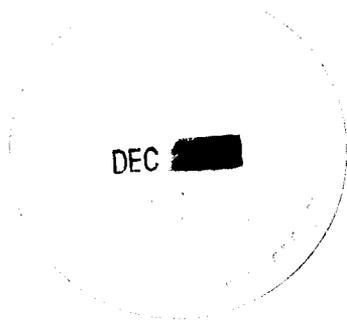
Permit



Northern New Mexico Citizens' Advisory Board
A U.S. Department of Energy Site-Specific Advisory Board
1660 Old Pecos Trail, Suite B, Santa Fe, NM 87505
Phone: (505) 989-1662 or 1-800-218-5942
Fax: (505) 989-1752 www.nnmcab.org

December 4th, 2002

Mr. James P. Bearzi, Chief
Hazardous Waste Bureau
New Mexico Environment Dept.
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303



Dear Mr. Bearzi,

Enclosed please find a Resolution adopted by the Northern New Mexico Citizens' Advisory Board at its November 20th meeting. Please accept this as the CAB's public comment, regarding the Class III Permit Modification Request.

If you have any questions or concerns, please feel free to call me, or our Executive Director, Menice S. Manzanares. Thank you for the opportunity to comment.

Sincerely,

James A. Brannon

James A. Brannon, Chair
NNMCAB

Enclosure: a/s

Cc: Ted Taylor, DDFO
Menice S. Manzanares
CAB File



16126

**NORTHERN NEW MEXICO CITIZENS' ADVISORY BOARD
RESOLUTION**

**On the Class III Permit Modification Request
(submitted to the New Mexico Environmental Department on 9/30/02)**

WHEREAS the Risk Reduction and Environmental Stewardship - Remediation (RRES-R) Program of the Los Alamos National Laboratory (LANL) has investigated nine (9) Solid Waste Management Units (SWMUs) (See attached list for identification of the nine.), and

WHEREAS RRES-R has remediated all nine SWMUs to the level at which they have been found to pose no threat to human health or the environment, and

WHEREAS RRES-R has submitted a request to the Hazardous Waste Bureau of the New Mexico Environment Department (NMED) to remove these nine SWMUs from the Corrective Action Module of the Resource Conservation and Recovery Act (RCRA) Hazardous Waste Facility permit, as they require No Further Action (NFA), and

WHEREAS the Hazardous Waste Bureau of the NMED has responded with a letter of concurrence for each of the requested units, and

WHEREAS the Environment Restoration Committee of the Northern New Mexico Citizens' Advisory Board (NNMCAB) has received a technical review of the remedies applied to the nine Solid Waste Management Units (SWMUs) proposed for No Further Action (NFA), has conducted tours of the SWMUs which required cleanup, and has evaluated the effectiveness of the cleanups, and

WHEREAS the ER Committee concurs with the finding that these nine units can be removed from the LANL Corrective Action Module of the permit without endangering human health or the environment, inasmuch as it has been shown that the contamination at each of these sites has been reduced to a level which meets or exceeds the RCRA requirements for the uses proposed for these parcels,

NOW THEREFORE, BE IT RESOLVED THAT the NNMCAB requests that the Department of Energy (DOE)/National Nuclear Security Administration(NNSA) commend the RRES-R Program of LANL on behalf of the NNMCAB for continuing to advance the cleanup of the legacy waste at LANL on an accelerated schedule, and

BE IT FURTHER RESOLVED that the NNMCAB requests that DOE /NNSA commend NMED for the timely review of and written concurrence with documents which support this Class III Permit Modification, confirming that the cleanup detailed in this request for No Further Action is adequate and can be approved as presented.

Adopted November 20th, 2002

CLASS III PERMIT MODIFICATION REQUEST

List of Solid Waste Management Units Included in Request for No Further Action September 30, 2002

- 1. SWMU 00-003 Former container storage area for the operation and maintenance of the steam generation plant at the Los Alamos Operations Office site. (Western Steam Plant, inactive since 1987)**
- 2. SWMU 00-012 Former tank which received "blow down" water and steam when cleaning steam generators during operations at the plant at the Los Alamos Operations Office site.**
- 3. SWMU 00-019 Former sanitary wastewater treatment plant for the townsite and laboratory at the current Sombrillo site. Operated 1947 to 1964. Transferred to Los Alamos County; out of service in 1967.**
- 4. SWMU 00-028(a) Golf Course – watered with treated effluent from the Central Waste Water Treatment Plant – 1948 to 1951- and by treated effluent water from the Pueblo Waste Water Treatment Plant – 1951 to 1993.**
- 5. SWMU 00-028(b) North Mesa Softball Fields – watered as above.**
- 6. SWMU 01-001(m) Septic Tank 275 Never Installed in Warehouse 13 outside the original Technical Area One, near Los Alamos Canyon edge between 20th and 15th Streets.**
- 7. SWMU 21-029 DP Tank Farm on DP Road between current Knights of Columbus building and the Fire Department training tower. "Fuel Yard" operated by Zia Company from 1948 to late 1970's, decommissioned in 1988. 15 petroleum product storage tanks, 2 fill stations, and valves, similar to fuel yards at refineries and airports.**
- 8. SWMU 54-007(c) Two inactive Septic Tanks on TA-54. One served Office Building 54-34 and the Radioassay and Nondestructive Testing Facility 43-38 between the late 1980's and 1992. The other served an animal holding facility 54-015 from the mid-1960's until the late 1980's.**
- 9. SWMU 73-005 Contractors' Row across highway 502 from the airport. – Surface disposal area and steel sanitary septic tank used by construction contractors from 1947 until 1950.**