

Permit 2003



Solid Waste Regulatory Compliance
P.O. Box 1663, Mail Stop K490
Los Alamos, New Mexico 87545
(505) 667-0666/Fax (505) 667-5224

Date: May 22, 2003
Refer To: SWRC:03-019

Mr. Carl Will
RCRA Permits Management Program
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303



Dear Mr. Will:

SUBJECT: Copy of the Los Alamos National Laboratory Resource Conservation and Recovery Act (RCRA) Permit #NM0890010515

During the 2003 RCRA compliance inspection Steve Pullen of the Hazardous Waste Bureau (HWB) requested University of California (UC) representatives to produce a current copy of the permit. The New Mexico Environment Department's revision of the permit was dated later, with modifications to the operating portion dating January and February 1996 and modifications to the corrective chapter dating December 1998. Subsequently, a call was placed to Sandra Martin (HWB) to obtain the most recent revision. After an exchange of phone calls Ms. Martin suggested that you be contacted directly.

As a result of several conversations with you regarding this issue it became obvious that the content of the NMED revision of the permit and the revision that DOE/UC were using were different in a number of areas. It was noted that the NMED version contained a number of storage areas at TA-50 that were not present in DOE/UC revision. DOE/UC were not aware that the permit language had been modified to include these storage areas and other changes.

While the inspectors were here LANL staff had the opportunity to review the version of the LANL permit the inspectors were using. The following is a list of differences noted in that brief review of that document by Sandra Gabaldon of your staff and Gian Bacigalupa of LANL.

<u>Permit Section</u>	<u>SWRC homepage</u>	<u>NMED version</u>
Mod I	1-30-95	2-15-96
Mod II	1-30-95	2-15-96
Mod III	1-30-95	12-96
Mod IV	1-30-95	12-96
Mod V	5-12-95	2-15-96
Mod VI	1-30-95	1-30-95
Mod VIII	1-30-95	12-23-98
Table A,B,C	1-30-95	12-23-98



Figures	1 thru 9	1 thru 10
Attach. A	1-30-95	1-30-95
Attach. B	12-22-95	2-15-96
Attach. C	12-22-95	1-30-95
Attach. D	12-22-95	1-30-95
Attach. E-1	12-22-95	1-30-95
Attach. E-3	1-30-95	12-96
Attach. E-4	1-30-95	6-96
Attach. E-5	1-30-95	6-96
Attach. E-6	1-30-95	6-96
Attach. E-7	1-30-95	6-96
Attach. E-8	1-30-95	6-96
Attach. E-9	1-30-95	6-96
Attach. F	12-22-95	12-96
Attach. G	No entry	1989 permit
Attach. I	No entry	1989 permit
Attach. J	1-30-95	2-15-96

While these changes are numerous they do not include all of the modifications that have been submitted and approved by the Hazardous Waste Bureau. The permit displayed at the LANL website has been compiled by LANL from the permittee copy provided by NMED in June 1995. In December 1995, LANL submitted proposed revisions to the facility permit to incorporate the TA-50 and TA-54 permit modification (incorporating information from the "RCRA Permit Modification Request, Technical Area 50, Building 1; Rooms 35, 36, and 38/38A Container Storage Areas, Building 69; Waste Characterization, Reduction, and Repackaging Facility Indoor and Outdoor Container Storage Areas, Technical Area 54 West Building 38; Radioassay and Nondestructive Testing Facility High Bay, Low Bay, and Outdoor Container Storage Areas," submitted September 29, 1995 and approved February 28, 1997).

In January 1996, LANL submitted proposed revisions to the facility permit to incorporate the TA-54 Transuranic Waste Inspectable Storage Project (TWISP) approval (incorporating information from the "RCRA Part B Permit Application, Storage Pads 1, 2, and 4; Storage Domes A-D, Technical Area 54, Area G, Chemical Plating Waste Treatment Skid, Treated Liquid Storage Tanks, Technical Area 63, Hazardous Waste Treatment Facility," submitted in September, 1993, conditionally approved for TWISP on May 11, 1994 and the subsequent TWISP waste analysis plan). These modifications potentially affected significant portions of the permit, including the waste analysis, personnel training, and contingency plans. LANL has not received further notification that these revisions have been added to the permit. Subsequently, LANL permit development efforts were focused on the 1999 permit renewal applications and no further modifications to the permit were expected prior to the renewal.

Please accept this correspondence to be an official request for a current copy of the most recent revision of the RCRA permit for LANL. LANL encourages NMED to include all of the modifications that have been reviewed and approved in the past. We are requesting that you provide two hard and electronic copies of this document, which will then facilitate the distribution of the document and allow us to make this document available to all the operating groups covered by it.

Mr. Carl Will
SWRC:03-019

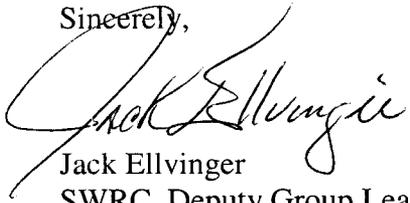
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May 22, 2003

If you should have any questions concerning this request please contact either Gene Turner (DOE-LASO) at 667-5794 or myself at 667-0633.

JE:vc

Sincerely,



Jack Ellvinger
SWRC, Deputy Group Leader

JE/vc

Cy: G. Turner, LASO, A316
B. Ramsey, RRES, J591
E. Louderbough, LC-ESH, A187
S. French, FWO-WFM, J595
J. Carmichael, SWRC, E501
E. Horst, NMT-7, G744
A. Sherrard, SWRC, K490
F. Sisneros, DX-4, C925
G. Rodriguez, SWRC, K490
L. Vigil Holterman, SWRC, K490
IM-5, A150
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