



Permit

Ideas That Change the World
Solid Waste Regulatory Compliance
P.O. Box 1663, Mail Stop K490
Los Alamos, New Mexico 87545
(505) 665-3435/Fax (505) 667-5224

Date: January 29, 2004
Refer To: SWRC:04-008

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Sandra Martin
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303



Dear Ms. Martin:

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

The purpose of this letter is to submit our second formal request for a current copy of the RCRA permit for LANL. During the 2003 RCRA compliance inspection, it became apparent that the New Mexico Environment Department (NMED) copy of the permit was not the same as LANL's, as explained in our initial written request dated May 22, 2003 as well as previous verbal requests. Review of the correct version of the Permit will facilitate preparation of LANL's response to the Notice of Violation (NOV), dated December 16, 2003, which alleged violations of LANL's permit. A current copy of the permit would also facilitate the preparation of potential future permit modifications if they become necessary.

LANL is aware of the following modifications to the facility permit, which do not appear to have been incorporated into any controlled copies of the document. The proposed modifications referenced potentially affected significant portions of the permit, including the authorized wastes and waste analysis, personnel training, and contingency plans. Some examples are:

- Class I permit modifications submitted to NMED in November 1993 incorporating additional EPA waste codes to Attachment G of the permit.
- In December 1995, LANL submitted proposed revisions to the facility permit to incorporate the TA-50 and TA-54 permit modification. These proposed revisions incorporated 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. Proposed modifications included 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 and conditionally approved for TWISP on May 11, 1994), as well as information from the subsequent TWISP waste analysis plan (submitted in March 1995).

We are requesting that you provide a hard and an electronic copy of this document. In addition, we would also like to request a meeting to discuss the modifications to the permit and how they are incorporated after we have had a chance to review NMED's version of the permit. If you should have any questions concerning these requests please contact me at (505) 665-0451.

Sincerely,



Tony Grieggs
Acting Group Leader

TG:LVH:vc

Cy: Tracy Hughes,
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✓ Carl Will
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