



BILL RICHARDSON  
GOVERNOR

*Permit*  
State of New Mexico  
**ENVIRONMENT DEPARTMENT**

**Hazardous Waste Bureau**  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
Telephone (505) 428-2500  
Fax (505) 428-2567  
www.nmenv.state.nm.us



RON CURRY  
SECRETARY

DERRITH WATCHMAN-MOORE  
DEPUTY SECRETARY

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

February 27, 2004

Mr. G. Pete Nanos  
Director  
Los Alamos National Laboratory  
P. O. Box 1663, MS A100  
Los Alamos, New Mexico 87545

Mr. Ralph Erickson  
Manager  
Los Alamos Site Office  
Department of Energy  
528 35<sup>th</sup> Street  
Los Alamos, New Mexico 87544

**SUBJECT: DETERMINATION OF INTERIM STATUS AND PERMITTED UNITS  
LOS ALAMOS NATIONAL LABORATORY EPA ID NO. NM0890010515**

Dear Messrs. Nanos and Erickson:

The New Mexico Environment Department (NMED) has created a list of what it believes to be hazardous waste management units under the federal Resource Conservation and Recovery Act (RCRA) or the New Mexico Hazardous Waste Act (HWA) at Los Alamos National Laboratory (LANL) for which NMED does not have documentation of closure under interim status. The list of units is included as a table attachment to this letter for your review.

In the renewed RCRA permit, NMED intends to address LANL's hazardous waste management units in the following manner. For Technical Areas (TA's) being permitted in the first round of the permit renewal, all hazardous waste management units at those TA's that have not completed closure at the time of permit issuance will be included in the permit, including all units at those TA's that were authorized at any time and for which closure is not complete at the time of permit issuance. Closure of those units will have to be completed in compliance with the renewed permit. Interim status will terminate for all units at those TA's. Upon issuance of the second and final round of the renewed permit, all hazardous waste management units at the LANL Facility that have not completed closure at the time of permit issuance will be included in the permit, including all units that were authorized at any time and for which closure is not complete at the



16175

Messrs. Nanos and Erickson  
February 27, 2004  
Page 2

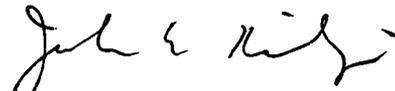
time of permit issuance. Closure of all units in the renewed permit will have to be completed in compliance with the permit. Interim status will terminate for all units at the LANL Facility.

NMED requests that you review the attached unit list and submit to NMED documentation of closure of the units on the list.

In addition, a RCRA Part A application dated November 23, 1987, references another Part A dated March 19, 1986. NMED does not have the March 19, 1986, Part A its administrative record. Please submit a copy of the March 19, 1986, Part A to NMED.

Please submit the requested information within 60 days. If you have any questions or need additional information, please contact me at (505) 428-2535.

Sincerely,



John E. Kieling  
Manager  
Permits Management Program

JEK:ctw

cc: S. Martin NMED HWB  
C. Will, NMED HWB  
L. King, EPA Region 6 (6PD-N)  
G. Turner, DOE OLASO, MS A316  
J. Ellvinger, LANL RRES-SWRC, MS K490  
G. Bacigalupa, LANL RRES-SWRC, MS K490

file: reading and LANL Permit

**LANL INTERIM STATUS UNITS WITH  
UNKNOWN CLOSURE STATUS**

UNIT	UNIT TYPE	DESCRIPTION	REGULATORY STATUS	AUTHORITY	PERMIT REQUESTED ?	CLOSURE STATUS	SUBJECT TO POST-CLOSURE CARE?	MIX WAS UNI
TA-3, SM-40	storage	temporary chemical waste storage	interim status	3/19/86 Part A; (from 11/23/87 Part A)	no	?	no	?
TA-9-39	storage	structure for storage	interim status	3/19/86 Part A; (from 11/23/87 Part A)	no	?	no	?
TA-16, SM102, Rm. 118A, ENG-R 2579	storage	LiH storage area	interim status	10/31/84 Part A (dated 10/31 and 11/1)	no	?	no	no
TA-22, TD 96	storage	structure used as storage area (temp)	interim status	3/19/86 Part A (from 11/23/87 Part A)	no	?	no	?
TA-22, TD 96-3	storage	temporary storage area	interim status	3/19/86 Part A (from 11/23/87 Part A)	no	?	no	?
TA-40, DF-2	storage	temporary storage area	interim status	3/19/86 Part A (from 11/23/87 Part A)	no	?	no	?

We don't have 3/19/86 Part A. Those units come from 11/23/87 Part A list of units submitted in other Part A's.