

Permit

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LANL Draft Permit Closure Plans

Kay, Rebecca, NMENV

From: Jack Ellvinger [jee@lanl.gov]
Sent: Tuesday, February 17, 2009 9:14 AM
To: Kay, Rebecca, NMENV
Cc: Gian Bacigalupa; Catherine Juarez; luciana@lanl.gov; Tori George; Tony Grieggs; Tina M. Sandoval; Bearzi, James, NMENV; Kieling, John, NMENV; Pullen, Steve, NMENV; Cobrain, Dave, NMENV; Roberts, Kathryn, NMENV; Turner, Gene E.; etl@lanl.gov
Subject: Re: LANL permit closure plan meeting

Rebecca:

My hope is that this meeting will be a give and take process. We have submitted a number of closure plans in the past which have been rejected. We are trying to make the ones submitted this time "the ones". As we discussed in our comments and during the negotiations we do not necessarily agree with everything that NMED put into the draft as guidance for the closure plans. We have always worked to develop closure plans that meet the requirements of the regulations. We will do so this time as well. My concern and the reason that I asked for this meeting is the very short turn around time that James B. has placed on the development of these plans. We will be hard pressed to make that time frame as it is with all of the other action items (42 at last count) that we are being asked to do. If the plans that we submit this time are found to be unacceptable we will be unable to rewrite them again this fiscal year in all probability. Time and money just will not be available (our original budgeting for staff and funds was based on the compliance schedule in the draft permit putting this effort off till next FY). So in order to make this work within the deadlines provided, we both need to be successful on the first go around. Regardless of what we write I anticipate that there will be issues within the closure plans that we will not agree upon. James B. discussed a NOD process but that will draw out time frames and will impact deadlines either for the closure plans or for action items. Therefore, we need to work together to produce the best product possible within the time frame provided. To that end, Gian has developed a "straw man" closure plan for the the TA-3 site. He should get it off to you today. We are just starting to look at it internally, so it is by no means our final proposal. At least it is a start from which we hopefully can proceed to an acceptable product. This will cover the indoor closures but still leaves the outdoor/pad closures to discuss. We have had some good discussions on these in the negotiations but I really hope that we can nail down the salient points for them on Thursday. Maybe once we get one them worked up we can have another meeting to discuss what we have at that point?

I am looking forward to this meeting and hope the outcome will be an agreement on the format for the closure plans that we will ultimately develop and submit in the next two months.

Thanks,

Jack

Kay, Rebecca, NMENV wrote:

> Jack-
 >
 > I can appreciate the 'swamped' sensation. It makes it difficult for us
 > to meet though when I don't really know what specifically you want to
 > meet and discuss concerning the closure plans. When will you have
 > something to send me that I can look at?
 >

> Rebecca

> -----Original Message-----

> From: Jack Ellvinger [mailto:jee@lanl.gov]
 > Sent: Wednesday, February 11, 2009 3:43 PM
 > To: Kay, Rebecca, NMENV
 > Cc: Gian Bacigalupa; Catherine Juarez; luciana@lanl.gov
 > Subject: Re: LANL permit closure plan meeting
 >

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> Rebecca:
>
> I do not think that what Gian is working on is ready for prime time.
> We
>
> are just swamped with deliverables both external and internal and
> getting enough time to work on something let alone finish it is almost
> impossible. I speak with Gian and see what the chances are.
>
> Thanks,
>
> Jack
>
>
> Kay, Rebecca, NMENV wrote:
>
>> Sounds good Jack. Will I be expecting anything from Gian before then?
>>
> An
>
>> outline on LANL's proposed closure plan format perhaps?
>>
>> -----Original Message-----
>> From: Jack Ellvinger [mailto:jee@lanl.gov]
>> Sent: Tuesday, February 10, 2009 10:13 AM
>> To: Kay, Rebecca, NMENV
>> Cc: Gian Bacigalupa; Bearzi, James, NMENV; Kieling, John, NMENV;
>>
> Pullen,
>
>> Steve, NMENV; Tori George; Tony Grieggs; Catherine Juarez;
>> luciana@lanl.gov; Cobrain, Dave, NMENV; Roberts, Kathryn, NMENV;
>>
> Turner,
>
>> Gene E.
>> Subject: Re: LANL permit closure plan meeting
>>
>> Rebecca:
>>
>> We can make it at 2PM on the 19th. We will see you then at your
>> offices.
>>
>> Thanks,
>>
>> Jack
>>
>>
>> Kay, Rebecca, NMENV wrote:
>>
>>
>>> Hi Jack-
>>>
>>> Sorry, but it looks like Thursday February 19th at 9am will not work
>>>
>>>
>> for
>>
>>
>>> some folks in this office.
>>>
>>> How about Thursday, February 19th in the afternoon at 2pm?
>>>
>>> -----Original Message-----
>>> From: Kay, Rebecca, NMENV
>>> Sent: Monday, February 09, 2009 10:03 AM
>>> To: 'Jack Ellvinger'

>>> Cc: Gian Bacigalupa; Bearzi, James, NMENV; Kieling, John, NMENV;
>>>
>>>
>> Pullen,
>>
>>
>>> Steve, NMENV; Tori George; Tony Grieggs; Gian Bacigalupa; Catherine
>>> Juarez; luciana@lanl.gov
>>> Subject: RE: LANL permit closure plan meeting
>>>
>>> Morning Jack-
>>>
>>> Let's say Thursday, February 19th then; 9am works.
>>>
>>> If Gian could get an outline of something to me before then, say by
>>> Wednesday (2/18/09) morning that would be helpful.
>>>
>>> Let me know if this works for you all.
>>>
>>> -rebecca
>>>
>>> -----Original Message-----
>>> From: Jack Ellvinger [mailto:jee@lanl.gov]
>>> Sent: Monday, February 09, 2009 9:47 AM
>>> To: Kay, Rebecca, NMENV
>>> Cc: Gian Bacigalupa; Bearzi, James, NMENV; Kieling, John, NMENV;
>>>
>>>
>> Pullen,
>>
>>
>>> Steve, NMENV; Tori George; Tony Grieggs; Gian Bacigalupa; Catherine
>>> Juarez; luciana@lanl.gov
>>> Subject: Re: LANL permit closure plan meeting
>>>
>>> Rebecca:
>>>
>>> I am sorry for the delay. We have been trying to line up funding and
>>> contractors to help us with the production of these docs. I would
>>>
> like
>
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>>> to have the contractors attend our meeting so they get the info
>>> first
>>>
>
>
>>> hand and we can then move ahead faster. I am thinking that with the
>>>
>>>
>> tour
>>
>>
>>> this week and the fact that I am still waiting to hear on funding
>>> for
>>>
>
>
>>> this project that next week would work better. Monday is a holiday
>>> so
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>
>

>>> maybe Tues, Wed or Thurs? Let me know. Gian is working on format so
>>>
> we
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>>>
>>>
>>
>>
>>> will have something concrete to discuss.
>>>
>>> Thanks,
>>> Jack
>>>
>>> Kay, Rebecca, NMENV wrote:
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>>>
>>>
>>>> Hi Jack-
>>>>
>>>> I am checking in with you to see where you and your team are at
>>>>
> about
>
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>>
>>
>>>> meeting to discuss closure plans. The way it was left a couple of
>>>> weeks ago at our meeting at San Ildefonso was that you were going
>>>> to
>>>>
>
>
>>>> talk to your group and propose a time for us to meet. I have not
>>>> yet
>>>>
>
>
>>>> heard back. Let's get this meeting to happen sooner than later J
>>>> Any
>>>>
>
>
>>>> day next week works for me except Friday (2/13) morning.
>>>>
>>>> Cheers-
>>>>
>>>> Rebecca
>>>>
>>>> Rebecca Kay
>>>>
>>>> NMED- Hazardous Waste Bureau
>>>>
>>>> 2905 Rodeo Park Drive East
>>>>
>>>> Building 1
>>>>
>>>> Santa Fe, NM 87505
>>>>
>>>> Phone: 505.476.6040
>>>>
>>>> Fax: 505.476.6030
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