

Permit

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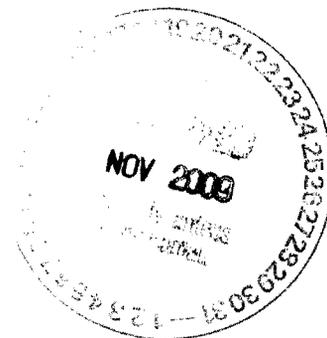
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Los Alamos Site Office, A316
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Date: November 16, 2009
Refer To: ENV-DO-09-015
LAUR: 09-07414

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

Dear Mr. Bearzi:



SUBJECT: ADDENDUM TO COMMENTS ON THE REVISED DRAFT LOS ALAMOS NATIONAL LABORATORY HAZARDOUS WASTE FACILITY PERMIT

The U.S. Department of Energy, Los Alamos Site Office and the Los Alamos Nuclear Security, LLC, (DOE/LANS) hereby submit to the New Mexico Environment Department- Hazardous Waste Bureau (NMED-HWB), an addendum to the comments on the revised draft Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit. The comments, originally submitted on September 4, 2009, did not contain a piece of one of the appendices referenced within the document.

Comment # 129 to Attachment K of the draft Permit, requests revisions to Tables K-1, K-2, K-3 to update the unit type descriptions to reflect current site status and to provide better consistency of descriptions of similar sites. The comment references the inclusion of suggested revisions within Appendix 4. Appendix 4 did not include these descriptions, so they are enclosed with this letter as an addendum to comments submitted on September 4, 2009. The attached table titled "Summary of Revised Unit Type Descriptions for Tables K-1, K-2, and K-3" (LA-UR-09-07414) presents the suggested revisions referenced in Comment # 129.



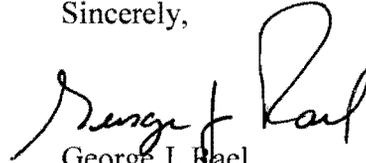
Provided herein is one hard copy and one electronic copy of the submittal. If you have questions concerning this submittal please contact Jack Ellvinger at (505) 667-0633 or Gene Turner at (505) 667-5794.

Sincerely,



Dennis L. Hjeresen
Acting Division Leader
Environmental Protection Division
Los Alamos National Laboratory

Sincerely,



George J. Rael
Assistant Manager
Environmental Operations
National Nuclear Security Administration
Los Alamos Site Office

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ENV-DO File, w/o enc., J978
ENV-RCRA File (09-205), w/enc., K490
IRM-RMMSO, w/enc., A150

Enclosure

**Addendum to Appendix 4 of Los Alamos National Laboratory Draft Permit
Comments**

Summary of Revised Unit Type Descriptions for Tables K-1, K-2, and K-3

Summary of Revised Unit Type Descriptions for Tables K-1, K-2, and K-3

Unit Number	Draft Permit Unit Type	Revised Unit Type
<i>Table K-1</i>		
00-018(b)	Former Sludge bed wastewater treatment plant, Central	Sludge-Bed Wastewater Treatment Plant
00-030(g)	Former Septic system (near old Catholic Church parking lot)	Former Septic Tank (Near Old Catholic Church Parking Lot)
00-030(h)	Former Septic System (near new Catholic Church)	Former Septic Tank (Near New Catholic Church)
00-030(i)	Septic System	Septic Tank
00-031(b)	Soil Contamination beneath former motorpool (2 USTs)	Soil Contamination from Former Motorpool Facility
00-033(b)	Outlet piping, 6th Street Warehouses	Soil Contamination from Drainlines
C-00-042	Tank	Former Underground Storage Tank
C-00-043	Manhole (removed)	Former Manhole
C-00-044	Lead contaminated area	Soil Contamination
01-001(s)	S Wasteline	Waste Line
01-002(b)-00	Outfall Associated with Ta-1 (Located in Former TA-45)	Outfall Associated with TA-01 (Located in Former TA-45)
01-006(h)	Storm drains and outfalls	Storm Drain and Outfall
01-006(n)	Storm drains and outfall	Storm Drain and Outfall
02-003(d)	Soil contamination associated with former effluent line	Soil Contamination Associated with Former Gaseous Effluent Line
02-011(b)	Former Drain	Former Drains
03-001(i)	Former equipment storage area	Storage Area
03-009(a)	Asphalt batch plant	Surface Disposal Site
03-025(b)	Former Sumps	Sumps
03-032	Former tanks and sumps	Tank and Associated Equipment
03-033	Sump	Former Tanks and Sumps
03-034(b)	Tank and/or associated equipment	Tank and Associated Equipment
03-056(a)	Oil Storage area	Oil Storage Facility
06-007(a)	Landfill	MDA F
C-06-005	Building TA-6-13 - chemistry laboratory, assembly, and storage	Soil Contamination from Former Building 06-13
C-06-016	Building TA-6-28 – magazine used for explosives storage	Soil Contamination from Former Magazine 06-28
C-06-020	Building TA-6-19 – former rest house	Soil Contamination from Former Building
09-003(i)	Settling Tank	Soil Contamination Associated with Former Sump and Pipes
14-005	Burn cage for OB/OD unit at	Open Burning Unit
15-003	Phermex OD site (TA-15-184)	PERMEX Firing Site
15-006(a)	Phermex OD site (TA-15-184)	PERMEX Firing Site
15-006(e)	I-J Firing Site at TA-36 (not TA-15), part of 36-004(e)	I-J Site at TA-36, Duplicate of C-36-006(e)
16-010(b)	Flash pad	Former Flash Pad
16-010(c)	Burn site 16-388 – RCRA Unit (active)	Flash Pad/Burn Tray
16-010(d)	Burn site 16-389 – RCRA Unit (active)	Burn Tray
16-010(e)	HE filter vessel (active)	Filter Vessel
16-010(f)	Burn site – RCRA Unit	Filter Vessel
16-010(j)	Former burn ground structures	Former Filter Bed/Burn Tray

Summary of Revised Unit Type Descriptions for Tables K-1, K-2, and K-3

Unit Number	Draft Permit Unit Type	Revised Unit Type
16-017(x)-99	Former structures	Soil Contamination from Former Storage Magazine 16-79
16-018	Material disposal area (MDA) P – currently undergoing RCRA closure	MDA P
19-003	Former East Gate Laboratory and septic system	Drainline and Outfall Associated with Former Building 19-05
21-001	Container Storage Area (MDA T)	Container Storage Area
21-010(a)	Soil Contamination from Former Waste Treatment Facility 21-35 (MDA T)	Soil Contamination from Former Waste Treatment Facility 21-35
21-010(b)	Soil Contamination from Former Manhole (MDA T)	Soil Contamination from Former Manhole
21-010(c)	Soil Contamination from Former Underground Tank (MDA T)	Soil Contamination from Former Underground Tank
21-010(d)	Soil Contamination from Former Underground Tank (MDA T)	Soil Contamination from Former Underground Tank
21-010(e)	Soil Contamination from Former Septic Tank (MDA T)	Soil Contamination from Former Septic Tank
21-010(f)	Soil Contamination from Former Grit Chamber (MDA T)	Soil Contamination from Former Grit Chamber
21-010(g)	Soil Contamination from Former Aboveground Tank (MDA T)	Soil Contamination from Former Aboveground Tank
21-010(h)	Soil Contamination from Former Manhole (MDA T)	Soil Contamination from Former Manhole
21-011(a)	Waste Treatment Facility 21-257 (MDA T)	Waste Treatment Facility 21-257
21-011(c)	Tank and Sump (MDA T)	Tank and Sump
21-011(d)	Holding Tank (MDA T)	Holding Tank
21-011(e)	Holding Tank (MDA T)	Holding Tank
21-011(f)	Holding Tank (MDA T)	Holding Tank
21-011(g)	Holding Tank (MDA T)	Holding Tank
21-011(h)	Soil Contamination from Former Storage Tank (MDA T)	Soil Contamination from Former Storage Tank
21-011(i)	Storage Tank (MDA T)	Storage Tank
21-011(j)	Storage Tank (MDA T)	Storage Tank
21-013(b)	Surface Disposal Site (MDA V)	Surface Disposal Site
21-013(g)	Surface disposal site (MDA V)	Surface Disposal Site
21-023(c)	Septic System (MDA V)	Septic System
21-028(a)	Container storage Area (MDA T)	Container Storage Area
C-21-009	Spill/ Non-Intentional Release (MDA T)	Spill/ Non-Intentional Release
C-21-012	Spill/ Non-Intentional Release (MDA T)	Spill/ Non-Intentional Release
22-014(a)	Industrial or sanitary wastewater treatment	Sump System
22-015(a)	Sump System	Drainlines and Dry Wells
31-001	Outfall from sanitary septic system	Soil Contamination from Former Septic Tank
33-004(m)	Septic tanks and leach field	Septic Tank and Leach Field
33-005(b)	Soil contamination from former waste line and leach field	Soil Contamination from Former Drainline
33-005(c)	Former structures - Main Site	Soil Contamination from Former Waste Line and Leach Field
33-007(b)	Firing site	Firing Sites
33-007(c)	Firing site	Firing Sites

Summary of Revised Unit Type Descriptions for Tables K-1, K-2, and K-3

Unit Number	Draft Permit Unit Type	Revised Unit Type
33-010(f)	Surface Disposal Site (MDA K)	Surface Disposal Site
35-003(l)	Soil contamination from former Pump kit	Soil Contamination from Former Pump Pit
40-003(a)	Scrap burn site – completed RCRA closure	Scrap Burn/Open Detonation Site
43-001(b)	Waste lines	Outfall
46-004(c)	Sump	Dry Well
46-004(d2)	Stack emissions	Soil Contamination from Stack Emissions
54-004	Material disposal area (MDA H) (except shaft 9)	MDA H
54-005	Material disposal area (MDA J) (Pits 1-5, Shafts 1-4)	MDA J
54-006	Material disposal area (MDA L) (all subsurface units such as Pit A, SI B,C,D, Shafts 1-28, 29-34)	MDA L
54-009	Septic system	Former Aboveground Tanks
54-014(a)	Material disposal area (MDA L) storage shafts (Pb stringer shafts)	Storage Shafts at MDA L
54-015(a)	Storage area (surface corrosive inhibitor)	Storage Area
54-015(c)	Storage area, TRU Pad 1	Storage Area
54-015(d)	Storage area, TRU Pad 2	Storage Area
54-015(e)	Storage area, TRU Pad 3	Storage Area
54-015(f)	Storage area, TRU Pad 4	Storage Area
54-015(k)	Layer of TRU Waste (MDA G)	Layer of TRU Waste
54-020	Material disposal area (MDA G) subsurface waste management units	Disposal Shafts (MDA G)
61-005	Landfill (Los Alamos municipal)	Landfill
73-004(c)	Septic tank	Septic System
C-73-005(a)	Excavation (unlined septic tank/outhouse trench)	Unlined Septic Tank/Outhouse Trench
C-73-005(b)	Excavation (unlined septic tank/outhouse trench)	Unlined Septic Tank/Outhouse Trench
C-73-005(c)	Excavation (unlined septic tank/outhouse trench)	Unlined Septic Tank/Outhouse Trench
C-73-005(d)	Excavation (unlined septic tank/outhouse trench)	Unlined Septic Tank/Outhouse Trench
C-73-005(e)	Excavation (unlined septic tank/outhouse trench)	Unlined Septic Tank/Outhouse Trench
C-73-005(f)	Excavation (unlined septic tank/outhouse trench)	Unlined Septic Tank/Outhouse Trench
Table K-2		
Table K-3		
00-004	Container Storage, 6th street warehouses, C27	Container storage, 6th Street Warehouses
00-005	Container storage, 6th Street Warehouses	Landfill
01-006(p)	Storm drains and outfall	Storm Drain and Outfall
03-001(i)	Former equipment storage area	Storage Area
03-032	Former Tanks and Sumps	Tank and Associated Equipment
15-004(e)	Mistakenly called firing site (actually manhole bunker)	Manhole bunker - mistakenly called firing site
15-009(j)	Septic System	Septic tank

Summary of Revised Unit Type Descriptions for Tables K-1, K-2, and K-3

Unit Number	Draft Permit Unit Type	Revised Unit Type
C-15-012	Underground tanks	Underground tank
16-025(e2)	Abandoned building, 16-106	Soil Contamination from Former Magazine 16-106
16-025(f2)	Abandoned building, 16-107	Soil Contamination from Former Magazine 16-107
16-025(h2)	Abandoned building, 16-109	Soil Contamination from Former Magazine 16-109
22-014(c)	Unit	Unit does not exist
30-001	Soil contamination from former septic tank	Surface disposal and landfill
46-008 (misc)	Storage area	Storage area - doesn't exist
46-010 (misc)	Storage area	Storage area - doesn't exist
61-004(c)	Septic tank	Septic system