

Permit



Pullen, Steve, NMENV

From: Gian Bacigalupa [gian@lanl.gov]
Sent: Monday, January 11, 2010 2:58 PM
To: Pullen, Steve, NMENV
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Subject: Draft Language for LANL Permit - WGO Training

Steve,

We had said we would provide some language for the draft permit before next Wednesday's meeting. This is in regards to Attachment F, Training Plan, Section F.4, discussing the Waste Generation Overview course. Based on your e-mail, you were wanting language on the topic of waste characterization, particularly regarding LDRs. We're proposing the following.

The existing language in the draft training plan is in black. The addition is red:

"Section F.4 Implementation of Training Program

Waste Generation Overview is an introductory course that provides an overview of federal and state waste management regulations and Facility policies and procedures for waste management operations. The training addresses the information needed to identify and properly manage wastes that are subject to hazardous waste regulations in 40 CFR Parts 261, 264, and 268. Course topics include waste characterization and classification including identification of RCRA waste types and their determination, the information needed to characterize the wastes, and the documentation requirements for proper management of the wastes."

We went with a couple of ideas to keep simple. The language is a summarization based on the discussion in the training plan. The LDR key is the expansion of the regulatory citations to include 40 CFR Parts 264 and 268.

I hope this is what you were looking for. If not, please call me and we can discuss.

Thank you,
Gian Bacigalupa
ENV-RCRA
667-1579

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