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Date: May 12, 2011
 Refer To: ENV-RCRA-11-0090

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

Dear Mr. Kieling:

SUBJECT: REQUEST FOR REVISIONS TO LANGUAGE INCLUDED IN THE MARCH 2011 CLASS 1 PERMIT MODIFICATIONS TO THE LOS ALAMOS NATIONAL LABORATORY (LANL) HAZARDOUS WASTE FACILITY PERMIT

The purpose of this letter is to request a revision to the Class 1 permit modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (the Permit) submitted by the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) to the New Mexico Environment Department- Hazardous Waste Bureau (NMED-HWB) on March 17, 2011. The requested modification included changes to emergency equipment lists, clarification of permit conditions and inspection activities, and the addition or removal of structures at permitted units.

Based on conversations with your office on March 20, 21 and 28, 2011, DOE and LANS requests language included in the March 17, 2011 proposed permit modification be revised to improve inspectability and enforceability of the Permit. The proposed modification to the Inspection Plan (Attachment E of the Permit) included revision of the Inspection Record Form Instructions only; those modifications were intended to clarify inspection of certain items and convey the variability in methods of inspection that exist between permitted units. Per our discussions with your staff, DOE and LANS request that two of the original proposed modifications be revised as detailed below.

Location within the Inspection Record Form Instructions	March 2011 Proposed Modification	Revised Language
Item 9	Required signs must be legible and prominently posted in accordance with	Required signs must be legible and prominently posted in accordance with

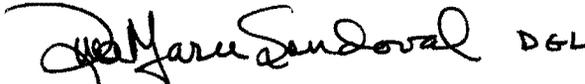
	40 CFR § 264.14(c) and/or the permit as applicable. Signs at large outdoor storage areas may be inspected semi-annually as necessary to prevent deterioration.	40 CFR § 264.14(c) and the permit as applicable. Signs at large outdoor storage areas will be inspected no less than two times per year to prevent deterioration.
Item 13	Where present, eyewashes and safety showers must be inspected to ensure proper operating condition or that scheduled routine inspections have been conducted and documented. Outdoor locations must be checked for freezing.	Where present, eyewashes and safety showers must be inspected to ensure proper operating condition or that scheduled routine inspections have been conducted and documented as indicated at the eyewash or safety shower. Outdoor locations must be checked for freezing.

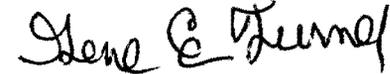
Upon approval of the Permit modifications, a notification of the modifications will be sent to the NMED-HWB-maintained LANL facility mailing list in accordance with 20.4.1.900 NMAC (incorporating 40 CFR § 270.42(a)(1)(ii)).

If you have comments or questions regarding this Permit modification, please contact Gene Turner at (505) 667-5794 or Mark Haagenstad at (505) 665-2014.

Sincerely,

Sincerely,


for Anthony R. Grieggs
Group Leader
Water Quality & RCRA Group
Los Alamos National Laboratory


Gene E. Turner
Environmental Permitting Manager
Environmental Projects Office
Los Alamos Site Office
National Nuclear Security Administration

ARG:GET:LVH/lm

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ENV-RCRA File, K490
IRM-RMMSO, A150