Department of Energy
Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

APR 12 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Robert S. (Stu) Dinwiddie, Ph.D., Manager
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo Street, Building A
P. O. Box 26110
Santa Fe, NM 87505

Dear Dr. Dinwiddie:

Subject: Class I Permit Modification Request for Technical Area (TA)-16-388

The purpose of this letter is to request a Class I permit modification for TA-16-388 at Los Alamos National Laboratory (LANL). In our January monthly meeting, the issue of how to proceed with the operation of this site was discussed. Subsequently, Rosilee Winn of your staff contacted us with the guidance that LANL should seek a Class I permit modification under 20 NMAC 4.1 Subpart X, 40 CFR §270.42, Appendix I, A.3. This section allows for upgrades of equipment with functionally equivalent components.

This Class I modification calls for the replacement of the old burning method with new propane burners. For safety and security reasons, high explosives-contaminated materials cannot be removed from the area until they are "flashed," which means to heat an object up to a temperature where the high explosives will be destroyed.

TA-16 currently has one flash pad and one oil/solvent burn tray that use wood fuel to heat up the high explosives-contaminated equipment. This technology is outdated and not as effective as newer technology. The Class I modification will replace the wood-fueled flash pad and solvent/oil burn tray with propane burners. Propane is a much cleaner fuel and the temperature of the burn can be better controlled than when using wood.

To request a Class I permit modification, the requestor is required to submit a modified Part A covering the proposed modifications, to submit Part B information that is pertinent to the changes being proposed, and to publish a public notice to all those on the facility mailing list (maintained by you).

In April 1998, LANL submitted an updated Part A , which addresses the proposed changes at TA-16-388. In June 1996, LANL submitted a revised Part B, which covers the TA-16 operations and includes the proposed changes requested in this Class I permit modification.

I have enclosed a copy of the public notice that we will be mailing out to all those on your mailing list within the next 90 days per the regulations. In order to expedite this mailing, we request that you provide us with an electronic copy of your mailing list.

6163

In a subsequent telephone conversation with John Kieling, we agreed that the recent submittal of a Part A and the Revised TA-16 Chapter for the permit (already at NMED) would be adequate to meet the requirements in the regulations, and that LANL would use NMED's mailing list.

With the submittal of this request, we will proceed with the implementation of the proposed changes per the Class I permit modification regulations.

If you should have any questions concerning this issue, please contact me at (505) 665-5042 or Jack Ellvinger at (505) 667-0633.

Sincerely,

H. L. "Jody" Plum
Office of Environment

LAAME:3JP-112

Enclosure

Attachment I

APR 12 1999

Dear Interested Citizen:

The purpose of this letter is to inform the public of the Los Alamos National Laboratory's (LANL's) request to the New Mexico Environment Department (NMED), Hazardous and Radioactive Materials Bureau (HRMB) for a Class 1 modification to open burning operations at Technical Area 16 (TA-16). Open burning is used on-site to destroy high explosives to address safety and environmental concerns. This modification is necessary because cleanup activities of an old high explosives waste disposal site, referred to as Material Disposal Area P (MDA-P), cannot be accomplished on schedule without this change. LANL has submitted the required permit application that addresses these changes and all other operations at the TA-16 hazardous waste management unit. This application is currently under review by NMED/HRMB.

High explosives-contaminated materials cannot be removed from the area until they are "flashed," a term which means to heat an object up to a temperature where the high explosives will be completely decomposed. LANL currently has one flash pad and one oil/solvent burn tray that use wood fuel to heat up the high explosives-contaminated equipment. This technology is outdated and not as effective as newer technology. The Class I modification will expedite the replacement of the wood-fueled flash pad and solvent/oil burn tray with propane burners. Propane is a much cleaner fuel and the temperature of the burn can be much better controlled than using wood. This change is a major improvement because it will:

- significantly reduce air pollutant emissions;
- significantly reduce the generation of ash resulting from the burning of wood;
- render the flashed materials non-hazardous, which will enable reuse or recycling of flashed materials, as appropriate; and
- allow closure of the old wood-burning flash pad as part of the MDA-P closure.

LANL would be happy to answer any questions concerning this public notice. Please feel free to call Jack Ellvinger, with LANL's Environmental Safety and Health Division, at (505) 667-0633, or contact him at ellvinger_jack_e@lanl.gov, his electronic mail address..