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ENVIRONMENT DEPARTMENT

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 5, 1993

Mr. Jerry L. Bellows, Area Manager
Los Alamos Area Office
Department of Energy
528 35th Street
Los Alamos, New Mexico 87544-5000

**RE: ADMINISTRATIVE REVIEW: NOTICE OF DEFICIENCY
NM0890010515**

Dear Mr. Bellows:

The New Mexico Environment Department (NMED) has completed its administrative review of the Los Alamos National Laboratory (LANL) Research, Development and Demonstration permit application for the Hydrothermal Processing Unit. The permit application is being reviewed under the New Mexico Hazardous Waste Management Regulations and has been found to be incomplete. The deficiencies to be addressed are described in the enclosed two (2) page attachment. The regulations cited in the attachment are the New Mexico Hazardous Management Regulations (HWMR-7), Part V which adopts and incorporates 40 CFR Section 264 and Part IX which adopts and incorporates 40 CFR Section 270.

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Submit all information within thirty (30) days of receipt of this notice of deficiency. If you fail to provide the information within the thirty (30) days, you may receive a Notice of Violation and the facility may be subject to permit denial pursuant to HWMR-7 Part IX, 40 CFR Section 270.10(c). In cases where specific information cannot be provided within the thirty (30) day period, an extension to submit such information may be requested.

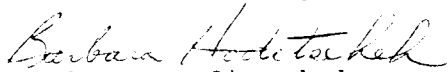
If you have any questions, contact Carl Stubbs at (505) 827-4308.



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Mr. Jerry L. Bellows, Area Manager
March 30, 1993
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Sincerely,



Barbara Hoditschek
Program Manager
RCRA Permit Section
Hazardous and Radioactive Materials Bureau

Enclosures.

xc: Bonito Garcia, NMED, HRMB
David Neleigh, US EPA Region VI
File Red

ADMINISTRATIVE COMPLETENESS REVIEW
OF RESEARCH, DEVELOPMENT AND DEMONSTRATION PERMIT APPLICATION

LOS ALAMOS NATIONAL LABORATORY
HYDROTHERMAL PROCESSING UNIT

I. General Facility Standards

The permit application must:

- A. provide the location of the unit by latitude and longitude [Part V, 40 CFR 264.13(b)];
- B. provide an assessment of seismic vulnerability [Part IX, 40 CFR 270.11)];
- C. provide an assessment of the vulnerability of the unit to a 100-year flood [Part IX, 40 CFR 270.14(b)(11)];
- D. provide the telephone number of the operator and owner of the facility [Part IX, 40 CFR 270.13(d) & (e)];
- E. explain why the proposed activity is experimental or innovative, and how it will qualify for a Research, Development and Demonstration permit [Part IX, 40 CFR 270.65(a)]; and
- F. specify the quantity of waste to be treated at the unit [Part IX, 40 CFR 270.13(j)].
- G. provide a written assessment reviewed and certified by an independent, qualified registered professional engineer. [40 CFR 270.16(a) and 264.191(a)]

II. General Waste Analysis

The permit application must:

- A. describe the parameters for which each hazardous waste, or non-hazardous waste will be analyzed and the rationale for the selection of these parameters [Part V, 40 CFR 264.13(b)(1)];
- B. describe the test methods which will be used to test for the selected parameters [Part 264.13(b)(2)]; and
- C. describe the sampling methods which will be used to obtain a representative sample of the waste to be analyzed [Part V, 40 CFR 264.13(b)(3)].

III. Preparedness and Prevention

The permit application must:

- A. describe how unknowing entry will be prevented and how the

possibility for unauthorized entry onto the active portion of the unit will be minimized [Part V, 40 CFR 264.14(a)];

- B. describe the security procedures and equipment used to provide 24 hour surveillance of the active portion of the unit [Part V, 40 CFR 264.14(b)(1)] or describe the barrier(s) and means to control entry [Part V, 40 CFR 264.14(b)(2)];
- C. describe the warning signs at the unit [Part V, 40 CFR 264.14(c)].
- D. describe how aisle space will be maintained to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the unit [Part V, 264.35]; and

IV. Recordkeeping, Reporting, and Documents to be Kept at the Facility

The permit application must:

- A. describe the availability, retention and disposition of records [Part V, 40 CFR 264.73(a)]; and
- B. describe the records on location of hazardous wastes within the facility [Part V, 40 CFR 264.73(a)(2)];