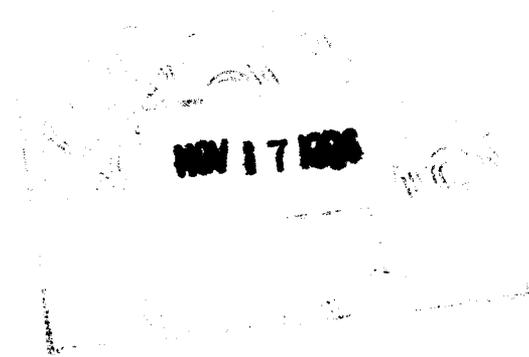




Department of Energy
Field Office, Albuquerque
Los Alamos Area Office
Los Alamos, New Mexico 87544
NOV 15 1994



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Barbara Hoditschek
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
525 Camino de los Marquez
Santa Fe, NM 87502

Dear Ms. Hoditschek:

This letter is written in regard to the Los Alamos National Laboratory (LANL) Packed Bed Reactor/Silent Discharge Plasma (PBR/SDP) Unit, for which a Resource Conservation and Recovery Act Research Development and Demonstration (RD&D) Permit has been issued (Permit Number NM0890010515-RDD1).

On November 2, 1994, the LANL Hazardous and Solid Waste Group (ESH-19) was informed that the PBR/SDP Unit had been moved from Technical Area (TA) 35, Building 128, to TA-35, Building 421. This new location is approximately 150 feet from the former location of the unit. The PBR/SDP Unit, however, did not need to go through closure in accordance with RD&D Permit Attachment K, "Closure Plan," for the following reasons:

1. No hazardous waste had been treated in the PBR/SDP Unit prior to the move to its new location (therefore, there was no possibility of post-closure escape of hazardous waste, and equipment decontamination was not required because equipment had not contacted hazardous waste).
2. No hazardous waste was received or stored at the former site of the unit (therefore, there was no waste inventory for subsequent management, and no leaks or spills of hazardous waste were possible).
3. The unit was undergoing minor modifications within the scope of the permit up to the time of the relocation.
4. The unit was not operational for the treatment of hazardous waste at the time of the relocation due to these modifications.

Enclosed is a memorandum provided by the CST-18 operators of the PBR/SDP Unit certifying the facts presented above.



5178

NOV 15 1994

Barbara Hoditschek

2

RD&D permit modifications will be prepared and sent for review, reflecting the change in location for the unit and related issues. The PBR/SDP Unit will not be in operation at the new location until permit modifications are approved by the New Mexico Environment Department. Upon completion of all RD&D experiments, LANL will clean close the PBR/SDP Unit in accordance with all applicable permit closure requirements.

Sincerely,



Joseph C. Vozella
Acting Asst. Area Manager
Office of Environment
and Projects

LAAMEP:7JM-274

Enclosure

cc w/enclosure:
HSW File (94-0407), LANL,
MS-K498

Los Alamos

Los Alamos National Laboratory
Chemical Science and Tech. Div.
Los Alamos, NM 87545

mail to
MSK498
PO Box 1663
LA, NM 87545

memorandum

To: Tony Grieggs and John Pieniázek
ESH-19 FAX 7-5224
From: J. Coogan and L. Rosocha
CST-18, MS E525
FAX 665-8441
Symbol: CST18-JC-110801
Date: November 8, 1994

Subject: Relocation of PBR/SDP

This memo is to clarify several issues concerning the movement of laboratory equipment, as regards activities under permit NM0890010515-RDD1. The equipment was moved from TA-35, building #128 to the adjacent building #421. The approximate distance of the move is 150 ft.

No hazardous waste treatment activities have been started.

At no time was any hazardous waste delivered, stored, or treated in bldg. 128.

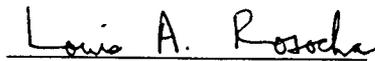
Fabrication and assembly, within the scope of the permit, are still underway in preparation of hazardous waste treatment. These include the completion of plumbing from PBR to SDP and final assembly of SDP cells.

We will not initiate any hazardous waste treatment or storage activities covered by the permit until the completion and approval of permit modifications regarding the equipment's new location.

If more detail is required, please contact us at any time.



John Coogan, 665-0186
CST-18, MS E525



Louis Rosocha, 667-8493
CST-18, MS E525