



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

AUG 30 1995

AUG 25 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Benito J. Garcia, Bureau Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
525 Camino de los Marquez
P. O. Box 26110
Santa Fe, NM 87502

Dear Mr. Garcia:

Subject: Formal Modifications/Classification Determination

This letter requests formal modifications and a classification determination for the Los Alamos National Laboratory (LANL) Packed Bed Reactor/Silent Discharge Plasma (PBR/SDP) Treatment Unit, for which a Resource Conservation and Recovery Act (RCRA) Research, Development and Demonstration (RD&D) Permit has been issued (Permit Number NM0890010515-RDD1). Specifically, this letter requests modifications to the RD&D permit as a result of and to reflect the relocation of the unit from Technical Area 35 (TA-35), Building 128, to TA-35, Building 421, to reflect LANL organizational changes that have occurred since issuance of the RD&D permit, and to provide editorial and typographical corrections. Furthermore, a new contingency plan is provided to reflect LANL organizational changes and to include the required emergency equipment list that was inadvertently omitted from the original plan. All of these modifications are explained and summarized in the attached enclosure following this letter (both disk and hard copy).

BACKGROUND ON THE MOVEMENT OF THE PBR/SDP UNIT

On November 2, 1994, the LANL Hazardous and Solid Waste Group (ESH-19) was informed that the PBR/SDP Unit had been moved to TA-35, Building 421, on the first floor in the northeast corner of the Pulsed Power Research Laboratory (PPRL). The PPRL is located 60 feet (closest dimension) from Building 128, the former location of the unit. LANL and the Los Alamos Area Office (LAAO), notified the New Mexico Environment Department (NMED) of the relocation on November 3, 1994, in a telephone conversation with Cornelius Amindyas. Furthermore, LAAO notified NMED of the relocation in a letter to Barbara Hoditschek, on November 8, 1994. In that letter, it was indicated that RD&D permit modifications will be prepared and sent for review reflecting the change in location for the unit and related issues. It also was provided that the PBR/SDP Unit will not be operated at the new location until permit modifications are approved by NMED, and that the unit



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Benito J. Garcia

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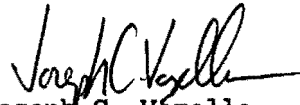
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did not need to go through closure in accordance with RD&D Permit Attachment K, "Closure Plan", because of the following:

- No hazardous waste has been treated in the PBR/SDP Unit prior to the movement to its new location.
- No hazardous waste was received or stored at the former site of the unit.
- The unit was undergoing minor modifications within the scope of the permit up to the time of the relocation.
- The unit was not operational for the treatment of hazardous waste at the time of the relocation, due to these modifications.

We request written verification that you have received this transmittal. If you have any questions, please contact Jody Plum of my staff at (505) 665-5042.

Sincerely,



Joseph C. Vozella
Assistant Area Manager
Office of Environment
and Projects

LAAMEP:2JP-006

Enclosure

cc w/enclosure:

J. Plum, AAMEP, LAAO

cc w/o enclosure:

J. Mack, AAMEP, LAAO

D. Erickson, ESH-DO, LANL,
MS-K491

A. Gancarz, CST-DO, LANL,
MS-J515

L. Coogan, CST-18, LANL,
MS-E525

L. Rosocha, CST-18, LANL,
MS-E525

J. Ellvinger, ESH-19, LANL,
MS-K490

A. Grieggs, ESH-19, LANL,
MS-K498

J. Pieniazek, ESH-19, LANL,
MS-K498

ESH-19 (9503243JP), LANL,
MS-K490