

Los Alamos National Laboratory

Hazardous and Solid Waste Group (ESH-19)

P.O. Box 1663, Mail Stop K490
Los Alamos, New Mexico 87545
(505) 665-9527 / FAX (505) 667-5224

Date: April 19, 2000
Refer to: ESH-19:00-036

Mr. John E. Kieling, Program Manager
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044-A Galisteo Street
P.O. Box 26110
Santa Fe, New Mexico 87502-6110

Dear Mr. Kieling:

SUBJECT: Permit Modification for TA-50 Storage Units

The Los Alamos National Laboratory (LANL) requests the deletion of four planned, but not constructed storage sites from Hazardous Waste Act permit NM0890010515. The planned storage sites carried proposed structure numbers and are included in the permit at TA-50-137, TA-50-138, TA-50-139, and TA-50-140. The proposed change falls within a Class I permit modification for administrative or informational change, New Mexico Administrative Code, Title 20, Chapter 4, Part 1, Subpart IX, 270.42. This class of permit modification is appropriate for the following reasons:

- The only issue available for review by the regulatory agency or the public is LANL's decision not to construct the planned storage sites;
- Where Appendix 1 provides for modifications to units not yet constructed, specifically modifications of surface impoundments, landfills or unenclosed waste pits, those modifications are Class I permit modifications requiring prior agency approval. There is no justification for imposing more stringent requirements to delete storage sites from a permit that were never constructed;
- A Class I permit modification satisfies all public notice requirements by informing the Director of New Mexico Environment Department (NMED), all persons on the facility mailing list, and the appropriate units of State and local government, of LANL's decision not to construct the planned storage sites; and
- More stringent requirements are unnecessary because deletion of the planned storage sites from the permit generates no technical information for the agency to review with respect to construction, operation or closure of those sites.



RED LANL TA-50/00
TA 50

TC

April 19, 2000

I have attached for your review copies of the Certifications by responsible Facility Managers and Division Directors of our decision not to construct the planned storage sites. The originals were sent to you under an earlier cover on November 12, 1998. If you have any questions concerning this issue please feel free to contact Jack Ellvinger at 667-0633. Thank you for your prompt attention to this matter.

Sincerely,


James L. White
Group Leader

JW/JE/vh

Enc. a/s

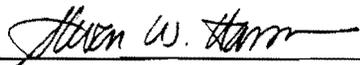
Cy: James P. Bearzi, Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044-A Galisteo Street
P.O. Box 26110
Santa Fe, New Mexico 87502-6110

Robert S. (Stu) Dinwiddie, RCRA Advisor
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044-A Galisteo Street
P.O. Box 26110
Santa Fe, New Mexico 87502-6110

J. Stetson, DOE/LAAO/PWT, A316
E. Louderbough, LANL, LC-GL, A187
G. Bacigalupa, LANL, ESH-19, K490
T. Gunderson, DLDOPS, LANL, A100
T. Stanford, LANL, K492
R. Alexander, LANL, E518
S. French, LANL, J595
L. Abercrombie, LANL, K558
J. Ellinger, LANL, K490
ESH-19 (00036.JE), LANL, K490

CERTIFICATION

I hereby certify that the proposed TA-50-137 Modular Storage Building was never built and therefore no mixed or hazardous waste was ever stored at the unit.



Steven W. Hanson
Group Leader for Environmental Management-
Radioactive Liquid Waste Group

10-22-98

Date



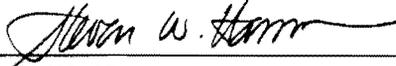
Thomas E. Baca
Division Director for Environmental Management

10/23/98

Date

CERTIFICATION

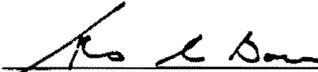
I hereby certify that the proposed TA-50-138 Modular Storage Building was never built and therefore no mixed or hazardous waste was ever stored at at the unit.



Steven W. Hanson
Group Leader for Environmental Management-
Radioactive Liquid Waste Group

10.22.98

Date



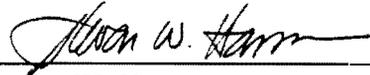
Thomas E. Baca
Division Director for Environmental Management

10/23/98

Date

CERTIFICATION

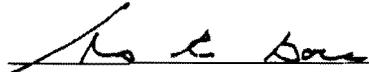
I hereby certify that the proposed TA-50-139 storage pad was never built and therefore no mixed or hazardous waste was ever stored at at the unit.



Steven W. Hanson
Group Leader for Environmental Management-
Radioactive Liquid Waste Group

10-22-98

Date



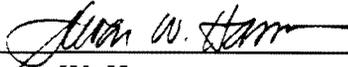
Thomas E. Baca
Division Director for Environmental Management

10/23/98

Date

CERTIFICATION

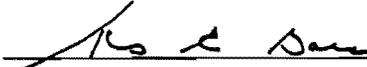
I hereby certify that the proposed TA-50-140 storage pad was never built and therefore no mixed or hazardous waste was ever stored at at the unit.



Steven W. Hanson
Group Leader for Environmental Management-
Radioactive Liquid Waste Group

10.22.98

Date



Thomas E. Baca
Division Director for Environmental Management

10/23/98

Date