

Los Alamos National Laboratory

Hazardous and Solid Waste (ESH-19)
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Date: November 28, 2000
Refer to: ESH-19:00-108

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Carl Will, Permitting Project Leader
RCRA Permits Management Program
Hazardous Waste Bureau
New Mexico Environment Department
2044-A Galisteo Street
P.O. Box 26110
Santa Fe, New Mexico 87502-6110



RE: Notification of Change of the TA-50-1 cementation Operation from Interim Status to <90-Day Generator Treatment

Dear Mr. Will:

The purpose of this letter is to pursue the change in status of the TA-50-1 Cementation process from interim status to <90 day generator treatment. Over the last month we have had several discussions regarding this issue. Earlier this month I sent a number of EPA guidance documents to Steve Jetter of your staff on this issue. I have attached those documents for your convenience also. I have also attached the discussion from the March 24, 1986 Federal Register reviewing the generator treatment option. Those documents support our position that this operation does not belong in the permit but rather should be generator treatment as defined in the regulations, 20.4.1 NMAC, 40 CFR 262.34.

The regulations require that in order for a treatment operation to be generator treatment, the operation had to be conducted in the past as such. We have queried the operational staff at TA-50-1 and confirmed that all actions have met with the <90 day requirements. Operations at the cementation site comply with the 20.4.1 NMAC, 40 CFR 265 Subpart I standards for container management as required by 20.4.1 NMAC, 40 CFR 262.34 regulations.

As per our conversation of Friday, November 17, 2000 discussing this issue, this letter will serve as notification that the waste cementation operation located in room 60A of Building 1 of TA-50 will be operated as generator treatment in a less than 90 day storage area. The operating personnel will follow all of the requirements for such an operation. Changes to the Part A to delete this operation will be made with the next revision of that document.

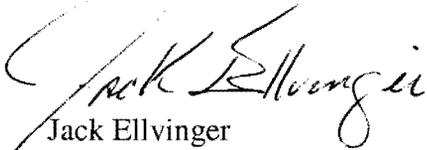


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If you should have any questions or concerns regarding this notification, please feel free to contact me at 665-0633.

Sincerely,



Jack Ellvinger
Hazardous and Solid Waste Group

JE/vh

Enc. a/s

Cy: w/o, Enc.
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CIC-10, A150
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