



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
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Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 11, 1994

TA 54
Mr. Jerry Bellows, Area Manager
Department of Energy
Los Alamos Area Office
528 35th Street
Los Alamos, NM 87544

Red file

Dear Mr. Bellows:

**RE: Conditional approval of RCRA Hazardous Waste Permit modifications.
EPA ID No. NM 0890010515-1**

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) has reviewed DOE/LANL's response to the NOD concerning the Technical Completeness Review of Area G TRU Storage Units. Following discussions between Jack Elvinger of your staff and Steve Zappe of HRMB concerning the intent of our March 15, 1994 letter, the NMED approves your permit modification request with the following conditions:

1. Because NMED does not accept knowledge of process (KOP) as a substitute for actual sampling and chemical/physical analysis required under the New Mexico Hazardous Waste Management Regulations (HWMR-7), 40 CFR 264.13, you must submit a revised waste analysis plan, containing a schedule for characterization of this mixed waste through sampling and analysis, for NMED approval by March 31, 1995.
2. Because revision pages to the contingency plan, closure plan, and waste management practices (Sections 4, 7, and 9) submitted January 28, 1994, do not allow simple insertion to update the original documents, you must submit complete copies of these three documents. Include a revised copy of Table 7-2 containing complete information for all emergency managers. While HWMR-7, 40 CFR 270.12(b) denies claims of confidentiality for the name and address of any permit applicant or permittee, you may include an additional copy of Table 7-2 requesting confidentiality.

DOE/LANL may now proceed with relocation of mixed waste presently stored on pads 1, 2, and 4 in TA-54, Area G, to the new storage pads authorized by this permit modification.



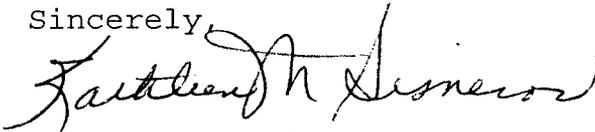
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Please contact Mr. Steve Zappe at (505) 827-4308 if you have any questions.

Sincerely,



Kathleen M. Sisneros
Director, Water and Waste Management Division

cc: Benito Garcia, HRMB
Barbara Hoditschek, HRMB
Susan McMichael, NMED
Jon Mack, DOE LAAO
Joyce Laeser, Counsel, LAAO
File: LANL Red 94