

LANL TA 54 Red '95



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GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

November 3, 1995

Mr. Jody Plum  
Department of Energy  
Los Alamos Area Office  
528 35th Street  
Los Alamos, NM 87544

Dear Mr. Plum:

**RE: Required Modifications to Hazardous Waste Permit to Include  
TA-54 Area G TWISP Domes  
EPA ID No. NM 0890010515-1**

The New Mexico Environment Department Hazardous and Radioactive Materials Bureau (HRMB) has reviewed material received from Los Alamos National Laboratory (LANL) in response to the Compliance Order related to storage of TRU mixed waste at TA-54 Area G. HRMB has determined that LANL must now submit the following information in order to proceed with modification of the facility hazardous waste permit. This information must be submitted in both WordPerfect 5.2 format disk files as well as redline/strikeout and clean paper copies of those sections of the permit which require modification. Submit this complete permit modification request to HRMB by January 31, 1996. Those portions of the current permit identified by HRMB as requiring modification are as follows:

1. Module II.C.1. Waste Analysis Plan - refer to Permit Attachment A1 (Hazardous Waste only) or A2 (TRU Mixed Waste), as appropriate.
2. Module III - add all pertinent references to activities associated with TA-54 Area G TWISP domes.
3. Attachment A - convert the existing Attachment A to Attachment A1, and add TRU Mixed Waste WAP as Attachment A2.
4. Remaining Attachments - make additions and corrections as necessary to address activities at TA-54 Area G TWISP Domes.

In general, use "Demonstration of Proposed Modifications to Los Alamos National Laboratory RCRA Operating Permit" (Project No.

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301608.12, December 1993) as a starting point to identify specific sections where additions and corrections may be made. Use applicable portions of chapters from "RCRA Part B Permit Application, Storage Pads 1, 2, and 4; Storage Domes A-D, Technical Area 54, Area G" (Project No. 301608.07, September 1993) as amended by LANL's response of January 28, 1994, to NMED's NOD of December 17, 1993. In addition, abide by the conditions contained in NMED's letter of May 11, 1994, which requires the use of the revised Waste Analysis Plan subsequently submitted by LANL on March 30, 1995.

Discussions and meetings with DOE and LANL staff have raised issues related to modifications of the original design of the TWISP domes. These issues include questions about the necessity of automatic sprinklers and the preparedness requirements of 20 NMAC 4.1 Subpart V, 40 CFR §264.32(c) and (d). Our interpretation of the term "fire control equipment" in (c) is not restricted to automatic sprinklers, but includes any of the items listed in (d) or within parentheses in (c). HRMB urges you to resolve this and any other outstanding issues prior to submittal of the permit modification for our consideration.

If you have any questions about this request, or wish to arrange a meeting to discuss the issues raised by this request, please call Steve Zappe of my staff at (505) 827-1561.

Sincerely,

  
Barbara Hoditschek, RCRA Permits Program Manager  
Hazardous and Radioactive Materials Bureau

cc: David Neleigh, EPA Region 6  
Jack Ellvinger, LANL  
Benito Garcia, Chief HRMB  
Coby Muckleroy, HRMB  
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