

TA-54



Scott Gibbs
Deputy Associate Director for Operations
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Date: May 23, 2002
Refer To: AD-Ops:02-054

Mr. James P. Bearzi, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303



Dear Mr. Bearzi,

Subject: Request for Extension: Notice of Deficiency (NOD) TA-54 Part B RCRA Permit Application September 1999, Revision 0.1 December 2000, Revision 2.0 Los Alamos National Laboratory (LANL) EPA ID# NM0890010515 HWB-LANL-99-050

The purpose of this letter is to request a 30-day extension for the LANL response to the subject NOD referenced above. The extension is needed because of the scope of information requested in order to address the NMED concerns contained in the document.

The NOD was received on April 18, 2002, and the original response date was sixty days from the receipt of the NOD or June 17, 2002. The new date for the required submittal of the response would become July 17, 2002, with your approval of this request.

The NOD requests additional information and procedures across a range of Technical Area 54 waste management operations including unit construction details, storage practices, waste information, and closure procedures. In some cases, responses require institutional decisions about changes in operating procedures and the production of new certified maps and figures. The level of detail requested by your office is perceived as higher than in previous information requests based upon the comments included in this NOD. Although we have applied extensive resources from several LANL organizations, we do not believe it will be possible to collect the information and develop adequate responses within the stated timeframe.

In addition, we need to receive clarification on some NOD comments regarding closures in order to correctly address NMED's concerns. A meeting has been arranged with the RCRA Permits Management Program (RPMP) for May 23, 2002.

This request has been discussed on a preliminary basis between Carl Will, RPMP, and Jack Ellvinger, LANL. No scheduling concerns were identified at that point. Two additional NODs related to LANL's permit renewal process have recently been received from your office. These



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include longer 90-day document production requirements and, without further information, we believe these indicate that an extension for this project should not complicate the schedule for the production of a draft permit. The extra time required to develop detailed responses may also work to our mutual advantage when LANL subsequently incorporates those responses approved by NMED into revisions to the permit application prior to the issuance of the draft permit.

We wish to comply with your request but believe it is important to spend the necessary time to address the issues presented in the NOD. Therefore, we are requesting the additional thirty days to develop our response to your letter. Thank you for your consideration of this issue. If you should have any questions concerning this issue, please feel free to contact Gian Bacigalupa, LANL, at 667-1579.

Sincerely,



Scott Gibbs
Deputy Associate Director

Cy: B. Ramsey, RRES-DO, MS J591
T. Stanford, FWO-DO, MS K492
D. Stavert, RRES-EP, MS J978
T. Grieggs, RRES-SWRC, MS K490
J. Ellvinger, RRES-SWRC, MS K490
G. Turner, OLASO, MS A316
IM-5, MS A150
File