



GARY E. JOHNSON
GOVERNOR

TA-54
**State of New Mexico
ENVIRONMENT DEPARTMENT**

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JOHN R. D'ANTONIO, Jr.
SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

December 12, 2002

Dr. John C. Browne
Director
Los Alamos National Laboratory
P.O. Box 1663, MS A100
Los Alamos, NM 87545

Ralph Erickson
Area Manager
Office of Los Alamos Site Operations
Department of Energy
528 35th Street, MS A316
Los Alamos, NM 87544

**SUBJECT: CHANGE DURING INTERIM STATUS APPROVAL
REPLACEMENT ASPHALT PAD AND TRANSURANIC WASTE
CHARACTERIZATION FACILITIES
TECHNICAL AREA 54, AREA G
LOS ALAMOS NATIONAL LABORATORY
NM 0890010515**

Dear Dr. Browne and Mr. Erickson:

The New Mexico Environment Department (NMED) approves a Change During Interim Status (CDIS) request submitted by the Los Alamos National Laboratory (LANL) and the U.S. Department of Energy (DOE) (collectively Permittees), pursuant to 20.4.1.900 NMAC (incorporating 40 C.F.R. § 270.72(a)(3)(ii)).

The request consists of a letter submitted by Permittees, dated November 7, 2002; a report titled "Resource Conservation and Recovery Act Change During Interim Status Proposal – Proposed Asphalt Pad and Modular Characterization Units," dated August 2002; and a revised Part A Permit Application, Revision 3.0, dated August 2002.

The Change During Interim Status consists of the construction of one asphalt storage pad where Storage Pads 2 and 4 are now located at Technical Area (TA)-54, Area G. The new pad will



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support new mobile, modular, waste analysis and repackaging units at Area G. Mixed transuranic waste (MTRUW) that is stored at Area G will be characterized and packaged at the modular units prior to shipment to the Waste Isolation Pilot Plant.

Storage of hazardous waste is currently authorized at Pads 2 and 4 as interim status hazardous waste management units pursuant to 20.4.1.600 NMAC (incorporating 40 C.F.R. Part 265). There will be will no increase in storage capacity or change to authorized waste at the replacement storage pad under this approved CDIS.

The approved change is necessary to comply with characterization requirements for shipment of MTRUW waste to the DOE Waste Isolation Pilot Plant facility which will allow for compliance with storage time limitations at 20.4.1.800 NMAC (incorporating 40 C.F.R. § 268.50).

The Permittees shall comply with all applicable requirements of 20.4.1.600 NMAC (incorporating 40 C.F.R. Part 265) for hazardous waste storage at the replacement pad and modular units.

If you have any questions or need additional information please contact Sandra Gabaldon of my staff at (505) 428-2543.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:sg

cc: John Kieling, NMED HWB
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File: Reading and LANL TA-54