



*Environmental Protection Division*  
Water Quality & RCRA Group (ENV-RCRA)  
PO Box 1663, MS K490  
Los Alamos, New Mexico 87545  
(505) 667-0666

*National Nuclear Security Administration*  
Los Alamos Field Office, A316  
3747 West Jemez Road  
Los Alamos, New Mexico, 87545  
(505) 667-5794/FAX (505) 667-5948



Date: **FEB 05 2013**  
Refer To: ENV-RCRA-13-0025

Mr. John E. Kieling  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6303

Dear Mr. Kieling:

**SUBJECT: REQUEST TO WITHDRAW THE CLASS 2 PERMIT MODIFICATION TO THE LOS ALAMOS NATIONAL LABORATORY (LANL) HAZARDOUS WASTE FACILITY PERMIT FOR TECHNICAL AREA (TA)-54, BUILDING 38, WEST, EPA ID NO. NM0890010515**

The purpose of this letter is to withdraw the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (collectively the Permittees), request for a permit modification to increase the storage capacity and storage footprint of the hazardous waste management units located at TA-54-38 West or RANT facility. The modification was drafted in accordance with Title 40 of the Code of Federal Regulations (40 CFR) § 270.42(b)) and submitted to the New Mexico Environment Department – Hazardous Waste Bureau (NMED-HWB) on January 10, 2013.

Based on a meeting with NMED-HWB staff on January 24, 2013, it was noted that the Resource Conservation and Recovery Act (RCRA) Hazardous Waste Part A Permit Application form was inadvertently left out of the permit modification submittal and consequently the submittal was incomplete. In addition to the Part A form, supplementary permit modification suggestions were made by NMED-HWB staff for the purpose of simplicity and clarification during the review process by NMED-HWB. Accordingly, the Permittees request to withdraw the January 10, 2013 permit modification and plan to resubmit a revised permit modification request.



The revised permit modification request will address the following:

- Update the Part A permit application form;
- Include a table that crosswalks permit application content requirements with the location of documentation;
- Correct inconsistencies throughout the Permit associated with the TA-54-38 West permitted units;
- Ensure that figures are consistent for the TA-54-38 West permitted units; and
- Include an expanded description of packaging and preparation for transport activities, additional information on traffic volumes, and a supplementary report on seismic location information associated with the TA-54-38 West permitted units.

It is the Permittees intent to develop and deliver a document that will be as close as possible to the needs that NMED-HWB staff communicated to process the permit modification request.

Please contact Mark Haagenstad (LANS) at (505) 665-2014 or Gene Turner (DOE) at (505) 667-5794 if additional information would be helpful.

Sincerely,



Anthony R. Grieggs  
Group Leader  
Water Quality & RCRA Group (ENV-RCRA)  
Los Alamos National Security, LLC

Sincerely,



Gene E. Turner  
Environmental Permitting Manager  
Environmental Projects Office  
Los Alamos Field Office  
U.S. Department of Energy

Cy: Gene E. Turner, NA-00-LA, (E-File)  
Carl A. Beard, PADOPS, A102  
Michael T. Brandt, ADESH, (E-File)  
Alison M. Dorries, ENV-DO, (E-File)  
Victoria A. George, REG-DO, (E-File)  
Kathryn M. Roberts, REG-SP, (E-File)  
Scott A. Miller, LTP-SSS, (E-File)  
Mark P. Haagenstad, ENV-RCRA, (E-File)  
Tammy A. Diaz, ENV-RCRA, (E-File)  
[LASOmailbox@nnsa.doe.gov](mailto:LASOmailbox@nnsa.doe.gov), (E-File)  
[IRM-RMMSO@lanl.gov](mailto:IRM-RMMSO@lanl.gov), (E-File)  
ENV-RCRA Correspondence File, K490