



DEPARTMENT OF ENERGY
National Nuclear Security Administration
Los Alamos Site Office
Los Alamos, New Mexico 87544



MAR 16 2011

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

Dear Mr. Kieling:

Subject: Transmittal of Request for Class 1 Permit Modifications to the Los Alamos National Laboratory Hazardous Waste Facility Permit, EPA ID No. NM0890010515

The purpose of this letter is to request review and approval of eleven (11) Class 1 permit modifications to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit) issued to the Department of Energy and Los Alamos National Security, LLC (DOE/LANS) on November 2010. The modifications revise the emergency equipment lists, clarify permit conditions and inspection activities, add and remove structures from permitted units, and revise figures and text associate with these clarifications, additions, and removals.

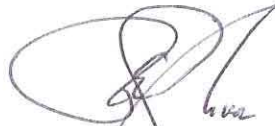
The proposed modifications have been prepared in accordance with the New Mexico Administrative Code, Title 20, Chapter 4, Part 1 (20.4.1.900 NMAC) (incorporating Code of Federal Regulations [CFR], Title 40 § 270.42(a) and (d)), revised March 1, 2009. The permit modifications are Class 1 modifications or Class 1 modifications requiring prior approval by the New Mexico Environment Department - Hazardous Waste Bureau (HWB) based upon the nature of the revisions requested. The basis for specific permit modification request classes has been included in the permit modification request discussions of this submittal. In some cases, the Class 1 modifications are strictly administrative such as the correction of structure numbers on figures or revision of form instructions. In others, the modifications involve structures that are used for waste management but do not substantially alter the conditions of the Permit. The changes are not made in response to changes in the types or quantities of the waste managed, technological changes in waste management procedures, new regulations, or to remove emergency equipment which is the basis for higher level modifications as discussed at 40 CFR §270.42(d).

The permit modification request package includes this transmittal letter, the enclosed permit modification request, and enclosed pages of the revised portions of the Permit (collectively LA-UR-11-01467). The revisions make editorial changes to the language in sections of the Permit that reference the revised structures, including deletions and additions to figures and descriptive text. Included herein are three hard copies and one electronic copy of this submittal. The hardcopy submittal contains pages or sections where text or figures have been changed rather than copies of full attachments or Parts of the Permit. The electronic copy contains a reproduction of the hardcopy in portable document format (pdf) along with all of the word processing files and figures used to create the hardcopy.

Upon approval of the Class 1 permit modifications requiring prior approval, a notification of those modifications will be sent to the NMED-HWB-maintained LANL facility mailing list in accordance with 20.4.1.900 NMAC (incorporating 40 CFR § 270.42(a)(1)(ii)). A notification to the mailing list for the self-implementing Class 1 permit modifications will be sent to the mailing list within seven days of the transmittal of this permit modification request.

If you have comments or questions regarding this permit modification, please contact Gene Turner of my staff at (505) 667-5794 or Mark Haagenstad, LANS, at (505) 665-2014.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin W. Smith', with a stylized flourish at the end.

Kevin W. Smith
Manager

Enclosures

cc w/enclosure:

Laurie King, Chief (6PD-N)
New Mexico/Federal Facilities Section
Environmental Protection Agency
Region 6 1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

cc w/o enclosure:

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

Steve Pullen

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

G. Rael, EPO, LASO
G. Turner, EPO, LASO
M. B. Mallory, PADOPS, LANL, MS-A102
C. Cantwell, ADESHQ, LANL, MS-K491
M. Graham, ADEP, LANL, MS-M991
A. Grieggs, ENV-RCRA, LANL, MS-K490
M. Haagenstad, ENV-RCRA, LANL, MS-K404
R. Lechel, ENV-EAQ, LANL, MS-J593
ENV-DO File, LANL, MS-J978
Records Center, LASO
Official Contract File, LASO

EPO:7GT-194-330337