



NEW MEXICO
and Brandt ENVIRONMENT DEPARTMENT
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Hazardous Waste Bureau

SUSANA MARTINEZ
Governor

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us

DAVE MARTIN
Secretary

JOHN A. SANCHEZ
Lieutenant Governor

BUTCH TONGATE
Deputy Secretary

THOMAS SKIBITSKI
Acting Director
Resource Protection Division

EP2013-5039

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 18, 2013

Juan Griego, Acting Manager
Los Alamos Site Office
Department of Energy
3747 W. Jemez Rd., MS-A316
Los Alamos, NM 87544

Michael T. Brandt, Associate Director
Environment, Safety, Health, & Quality
Los Alamos National Security, LLC
Los Alamos Research Park
P.O. Box 1663, MS K491
Los Alamos, NM 87545

**RE: 2012 LANL HAZARDOUS WASTE MINIMIZATION REPORT
LOS ALAMOS NATIONAL LABORATORY
EPA ID# NM 0890010515**

Dear Messrs. Griego and Brandt:

On November 26, 2012, the New Mexico Environment Department (NMED) received the 2012 Los Alamos National Laboratory (LANL) Hazardous Waste Minimization Report from the United States Department of Energy and Los Alamos National Security, LLC, collectively the *Permittees*. This report was submitted to NMED as required by Section 2.9 of the LANL Hazardous Waste Facility Permit (Permit).

Section 2.9 of the Permit states: "The Permittees shall implement and maintain a waste minimization program to reduce the volume and toxicity of hazardous wastes generated at the Facility (*see* 40 CFR § 264.73(b)(9))." NMED notes that the report generally complies with the Permit, and offers the following recommendation for future reporting years:

- Both the Permit and 40 CFR § 264.73(b)(9) require that the waste minimization program reduce the volume of hazardous wastes generated at LANL; however, waste quantities are reported by weight (kilograms) in the Report. To make the Report more useful to NMED and the public, and more

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compatible with other data reported by the Permittees (e.g., the Site Treatment Plan, quarterly Framework Agreement reports, etc.), the data should be reported in cubic meters and/or 55-gallon drum equivalents.

NMED appreciates your consideration of this recommendation. If you have any questions regarding this correspondence, please contact Tim Hall of my staff at 505-222-9555 or at timothy.hall@state.nm.us.

Sincerely,



Dave Cobrain
Program Manager
Permits Management Program
Hazardous Waste Bureau

cc:

J. Kieling, HWB, NMED
T. Hall, HWB, NMED
L. King, EPA 6PD-N
P. Gallagher, ENV-ES, LANLS, MS J978
G. Turner, DOE-LASO, MS-A316

File: Reading and LANL Permit 2013