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DAVE MARTIN
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BUTCH TONGATE
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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 5, 2012

Kevin W. Smith, 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: CLASS 1 PERMIT MODIFICATION REQUEST
LOS ALAMOS NATIONAL LABORATORY
EPA ID# NM 0890010515
LANL-12-023**

Dear Messrs. Smith and Brandt:

The New Mexico Environment Department (Department) has reviewed a *Class 1 Permit Modification Request (PMR)* dated April 2, 2012, submitted by the United States Department of Energy and Los Alamos National Security, LLC (collectively the Permittees). The PMR proposes 94 revisions to the Hazardous Waste Facility Permit (Permit) for Los Alamos National Laboratory (LANL).

NMED did not approve one requested modification requiring prior approval and two others that did not require prior approval. Additionally, several requested revisions were approved with modifications. The reasons for denial and approvals with modification are included in Attachment 1 of this letter. The approved modifications were put into effect as requested by the Permittees under the conditions specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.42(a)(1)). NMED incorporated these Class 1 modifications into the LANL Permit. Attached to this letter is an electronic copy of the Permit as modified. Also on the disc is a redline copy of the Permit Parts and Attachments that were modified.

Messrs. Smith and Brandt
June 5, 2012
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If you have any questions regarding this correspondence, please contact Tim Hall of my staff at 476-6049 or at timothy.hall@state.nm.us.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

Attachments

- 1) New Mexico Environment Department Review of Class 1 Permit Modification
- 2) Electronic copy of the Permit as modified

cc:

J. Davis, RPD, NMED
J. Kieling, HWB, NMED
T. Hall, HWB, NMED
L. King, EPA 6PD-N
T. Grieggs, ENV-RCRA, LANS, MS-K490
M. Haagenstad, ENV-RCRA, LANS, MS-K404
G. Turner, DOE-LASO, MS-A316

File: Reading and LANL Permit 2012

LANL-12-023

**Los Alamos National Laboratory Hazardous Waste Facility Permit
 EPA ID# NM0890010515**

Effective date: December 30, 2010

New Mexico Environment Department Review of Class 1 Permit Modification

Section	Paragraph	Type of Change	Proposed Change	Approved
<i>Permit Part 1</i>				
1.2	1	Typographical error (Class 1)	To correct EPA ID Number, change to "NM 0890010515"	Yes
1.5	# (4)	Remove a permit conditions that is no longer applicable (Class 1)	Delete "(4) the TA-16 Part B Permit Application dated June 2003"	Yes ¹
1.10	6 (2 nd to last paragraph of section)	Typographical error (Class 1)	Delete hyphen (-) between 'all' and 'documents'	Yes
1.10	7 (Final paragraph of section)	Typographical error (Class 1)	Delete last sentence in paragraph as it is repeated from page 26. Delete: "The Permittees shall establish an electronic Information Repository (IR) accessible through the internet on the Permittees' environmental website. (See 40 CFR § 124.33(d))"	Yes
1.10.1	Section Title	Title Change (Class 1*)	Change title of the section from "RACER" to " <u>Public Environmental Database</u> "	Yes
1.10.1	1	Title Change (Class 1*)	Change "Risk Analysis Communication Evaluation Reduction (RACER) database" to " <u>public database that provides comprehensive environmental data collected from in and around LANL</u> "	Yes ²
<i>Permit Part 2</i>				
2.2.1	(1), last sentence	Typographical error (Class 1)	Insert: "...of <u>the</u> written notice..."	Yes
2.2.1	# (4) b	Typographical error (Class 1)	Delete: "...per year..." as it is redundant with annual volume in same sentence	Yes

Section	Paragraph	Type of Change	Proposed Change	Approved
2.2.1	# (4) b	Clarification that the permit condition refers to a volume limitation, not a limit to the type of container (Class 1*)	State as “one 55-gallon drum <u>equivalent</u> ” and “two 55-gallon drums <u>equivalents</u> ” within the text.	Yes
2.6.3	1 (first)	Typographical error (Class 1)	Revise as, “Hazardous and Mixed Waste Facility Inspection Record Form” to match title of form in Attachment E (<i>Inspection Plan</i>).	Yes
2.10.5	3 (After bulleted list)	Title Change (Class 1*)	Change the first sentence of the paragraph to read: “The Permittees’ <u>Emergency Management and Emergency Planning and Preparedness Group Leaders</u> Primary Emergency Manager identified in Attachment D (<i>Contingency Plan</i>) shall annually sign a certification stating that the LAFD has been provided with this information to the satisfaction of the Chief of the LAFD.”	Yes
2.12.2	# (5)	Clarification that the period of time records should be kept is located in Section 2.12.2, but there are other requirements for the specific type of records outlined in Section 2.6 (Class 1*)	Paragraph refers to Section 2.6 for the time period certain records must be maintained and Section 2.6 refers to Section 2.12 for time frame information. Suggest changing the bullet to read “records and results of inspections as required in Permit Section 2.6 and Attachment E (<i>Inspection Plan</i>) (these records and results shall be kept <u>as for the period</u> specified in Permit Section 2.6);”	Yes ³

Section	Paragraph	Type of Change	Proposed Change	Approved
<i>Permit Part 3</i>				
3.7.1	#(8)	Clarification that the coating on metal pallets is always chemically-resistant material, but not always urethane. (Class 1*)	Change the paragraph to read: "The Permittees shall ensure that all metal secondary containment pallets are coated with have a chemically-resistant urethane coating . The Permittees shall maintain the chemical-resistant urethane coating in accordance with Permit Section 3.7.1 and the manufacturer's specifications."	Yes ⁴
3.9	# (4) d	Typographical error (Class 1)	Replace "in" with "is" as follows: "...and there is in is no possibility..."	Yes
<i>Permit Part 9</i>				
9.2.2.1	1	Typographical error (Class 1)	Insert: "...if the closure performance standard..."	Yes
9.2.2.3	1	Typographical error (Class 1)	Delete "indoor" as follows: "...(including associated indoor structures)..."	Yes
9.4.4.1	1	Typographical error (Class 1)	"...to verify the absence of hazardous constituents..."	Yes
9.4.7.1	# (4) a. (the last bullet of the list)	Administrative or informational change (Class 1)	Delete "(a) and (b)" as follows: "...and 9.4.7.1.ii (a) and (b) ..." as there are no subsections (a) and (b) in the referenced section of the permit.	Yes
9.4.7.1.i	1 (last sentence)	Administrative or informational change (Class 1)	Delete ".a" as follows: "...Permit Section 9.4.7.1.ii- a where applicable." As there is no subsection 'a' in the referenced section of the permit.	Yes
<i>Permit Part 11</i>				
11.3.1	3	Typographical error (Class 1)	Revise as, "The Permittees shall notify the Department, in writing, of any new detections of hazardous waste and hazardous waste constituents in groundwater at any location that for which analytical data was received during the previous month as described in Permit Section 11.3.1.1."	Yes

Section	Paragraph	Type of Change	Proposed Change	Approved
11.10.2.6	1	Clarification that samples may be collected from discrete subsurface zones and total well subsurface zones. (Class 1*)	Revise the first sentence to clearly state “Samples of subsurface vapors shall be collected from vapor monitoring points from both discrete zones, (selected based on investigation and field screening results) , and as total well subsurface vapor samples where required by the Department.”	No ⁵
11.10.2.8.ii	2	Administrative or informational changes (Class 1)	Revise the first sentence as, “All purged groundwater and decontamination water shall be temporarily stored at satellite accumulation areas, or transfer stations, or in labeled 55-gallon drums less than 90-day storage areas in labeled 55-gallon drums or other containers approved by the Department until proper characterization and disposal can be arranged.”	Yes
11.10.2.11	3 (last paragraph)	Typographical error (Class 1)	Revise as, “...as described in Permit Section 11.10.2.11 11.10.2.13 ”	Yes
11.10.3.1.iv	# (20)	Administrative or informational change (Class 1)	Revise as, “...ion chromatograms and mass spectra for gas...”	Yes
11.10.3.1.iv	# (21)	Typographical error (Class 1)	Delete “(GC/MS)” from bullet.	Yes
11.10.4.1.i	1	Typographical error (Class 1)	Revise first sentence as, “...shall include of a discussion...”	Yes
Permit Attachment A				
A.4.2.5	4	Administrative or informational change (Class 1)	Before the final paragraph of the section, add the subheading “ Storage Sheds ” for consistency with the other subtitles for the domes on Pad 5.	Yes
A.4.2.6	3 (Within subheading “Dome 283”)	Administrative or informational change (Class 1)	Correct “250 ft” to “ 260 ft ” for consistency with the closure plan in Attachment G.9.	Yes
A.4.2.8	1	Typographical error (Class 1)	In the first sentence of the paragraph, correct “Figure 34” to “ Figure 35 ”.	Yes

Section	Paragraph	Type of Change	Proposed Change	Approved
A.5	1	Typographical error (Class 1)	Change the tense of the sentence as follows: "The B05, B45, and TA-55-185 permitted units will be are used to store containers with only non-liquid bearing waste (i.e., solid form)."	Yes
A.5.6	1	Typographical error (Class 1)	Change "Figure 45" to " Figures 39 and 45 " in the first sentence of the paragraph.	Yes
A.5.7	1	Typographical error (Class 1)	Change "Figure 46" to " Figures 39 and 46 " in the first sentence of the paragraph.	Yes
A.5.7	1	Typographical error (Class 1)	Change the tense of the last two sentences as follows: "The TA-55-185 permitted unit will be is approximately 60 ft long by 40 ft wide, and will have has a maximum storage capacity of 30,000 gal, the equivalent of 546 55-gal drums. The types of waste containers holding hazardous or mixed waste that will be are stored at TA-55-185 include: 30-, 55-, and 85-gal drums; large waste boxes; and SWBs."	Yes
A.5.9	8	Typographical error (Class 1)	Change the tense of the first sentence of the paragraph as follows: "The homogeneous solid process wastes generated at TA-55 is are delivered to the Cementation Unit in a closed container from the generator glovebox through a trolley system."	Yes
A.5.11	2	Typographical error (Class 1)	Delete the word "application" from the following sentence as it is no longer applicable: "Fire-alarm pull boxes and/or drop box push-button alarms are located in the vicinity of the waste management units addressed in this permit application ."	Yes

Section	Paragraph	Type of Change	Proposed Change	Approved
<i>Permit Attachment C</i>				
Attachment C	1	Typographical error (Class 1)	Insert “by” and change “processes” to the singular tense as follows, “The waste characterization requirements contained in this WAP are used for characterization of wastes stored in containers and tanks, and to support treatment by the stabilization processes.”	Yes
Attachment C	Bullet “Section C.5”	Administrative or informational change (Class 1)	Insert complete regulatory reference as follows: “...ensure compliance with 40 CFR Part 264 Subpart CC requirements.”	Yes
C.1.2.1	Aqueous Liquids	Typographical error (Class 1)	Insert “action” as follows: “These wastes consist of liquids generated during various activities, including decontamination of remedial action equipment, drilling fluids and well development fluids, septic tank liquids, and contaminated stormwater runoff.”	Yes
C.1.3	1	Administrative or informational change (Class 1)	Define WIPP as ‘Waste Isolation Pilot Plant’.	Yes
C.2.1	# 3.	Typographical error (Class 1)	Correct second dashed paragraph as follows: “Physical waste from form ...”	Yes
C.3	3	Administrative or informational change (Class 1)	Insert “waste” as follows: “The Permittees shall ensure that waste characterization documentation is reviewed and approved prior to waste acceptance at a permitted unit.”	Yes
C.3.1.2.1	1	Administrative or informational change (Class 1)	Revise the second sentence of the paragraph as follows: “...described in Section 1.2 of SW-846 Method 1311,...”	Yes
C.3.1.2.2	1	Administrative or informational change (Class 1)	Revise the third sentence of the paragraph as follows: “In accordance with SW-846 Method 1311...”	Yes

Section	Paragraph	Type of Change	Proposed Change	Approved
C.3.2	1	Typographical error (Class 1)	Revise the last sentence of the paragraph as follows: "Characterization of the hazardous component of MTRUW to be stored and treated at the Facility shall be conducted in accordance with the procedures discussed in the following sections."	Yes
C.3.2	4	Administrative or informational change (Class 1)	For consistency, change "hazardous waste codes" to " <u>EPA Hazardous Waste Numbers</u> ".	Yes
C.3.2.1	2	Clarification (Class 1*)	Revise first sentence as follows: "...semi-quantitative <u>assay characterization</u> technique..."	Yes
C.5	1	Administrative or informational change (Class 1)	Correct regulatory reference to "...40 CFR <u>Part 264</u> Subparts BB and CC..."	Yes
C.5.3	1	Administrative or informational change (Class 1)	Correct the second regulatory reference to "...40 CFR Part 264 <u>Subpart BB</u> ..."	Yes
C.5.3.1	1	Typographical error (Class 1)	Correct regulatory reference to "...Reference Method 21 at 40 CFR Part 260 <u>60</u> ."	Yes
<i>Permit Attachment D</i>				
D.1	#4.	Administrative or informational change (Class 1)	Change the reference to Figure D-1 to the actual title of the figure. Figure D-1 is titled " <u>General Hazardous Waste Emergency Notification Structure</u> ", not the "ICS response structure" as stated in this paragraph.	Yes
D.1.1	#5.	Typographical error (Class 1)	Correction of the spelling for the Primary Emergency Manager. Change "Anderson" to " <u>Andersen</u> ".	Yes
D.1.7.2	1	Administrative or informational change (Class 1)	Revise as, "...EM personnel will notify the <u>Los Alamos County Consolidated Dispatch Center</u> CDC who will <u>which</u> in turn <u>will</u> notify..."	Yes
D.2.1	1	Administrative or informational change (Class 1)	Replace "KSL" with " <u>Maintenance Site Services</u> ".	Yes
D.2.2.2	1	Administrative or informational change (Class 1)	Change "CAS operator" to " <u>Los Alamos County Consolidated Dispatch Center</u> "	Yes

Section	Paragraph	Type of Change	Proposed Change	Approved
D.3.1	1.	Typographical error (Class 1)	Delete the extra word in last sentence and revise as, "...to determine to causal factors..."	Yes
D.3.2	#4.	Typographical error (Class 1)	Revise as, "...communicate the nature or <u>of</u> the emergency..."	Yes
TA-3 Attachment D	3	Typographical error (Class 1)	Revise the third sentence of the paragraph as, "The FIC is comprised of division and line managers and key personnel who respond to pre-designated locations for the purpose of initial command and control of events that occur at <u>during</u> CMR Building emergencies."	Yes
TA-50 Attachment D	3	Typographical error (Class 1)	Revise as, "...Incident Commander <u>er</u> ..."	Yes
<i>Permit Attachment E</i>				
E, Table of Contents	None	Typographical error (Class 1)	Change font and format to replicate other table of contents throughout the permit.	Yes
E, Table of Contents	List of Figures	Typographical error (Class 1)	Revise the name of Figure E-1 to "Hazardous and Mixed Waste Facility Inspection Record Form"	Yes
E.1	2	Typographical error (Class 1)	Revise as, "...in Permit Section 2.12.2 <u>2.6</u> "	Yes
E.1.1	3	Clarification that there are other options to meet this requirement as described earlier in the paragraph. (Class 1*)	This paragraph states that 'No Use' shall be documented in 'other records', however, the Inspection Form accounts for this condition and the form instructions also indicate that a 'No Use' condition be documented on the form. Therefore, the "shall" should be changed to " <u>may</u> ".	Yes ⁶
E.7.4	3	Administrative or informational change (Class 1)	Revise as, "...pursuant to <u>40 CFR §</u> 264.1061..."	Yes
Inspection Form Instructions	Part I, # 7	Typographical error (Class 1)	Revise paragraphs as "a., b., c." instead of "a., c., d."	Yes

Section	Paragraph	Type of Change	Proposed Change	Approved
TA-55 Attachment E	2	Typographical error (Class 1)	Remove the redundancy from the paragraph by revising the sentence as, "The Permittees shall perform and document daily inspections on separate forms for the fences at TA-55 and shall document them on separate forms."	Yes ⁷
TA-55 Attachment E, Section E.1.1	1	Typographical error (Class 1)	Remove the extra "d" within the paragraph and revise as, "...the Permittees shall removed that container..."	Yes
TA-55 Attachment E, Section C.3.2	Title	Typographical error (Class 1)	Revise section number to <u>E.3.2</u> instead of C.3.2.	Yes
Permit Attachment F				
F.4	2	Typographical error (Class 1)	Revise to remove unnecessary word, "...changes in hazardous waste regulations and to provide them..."	Yes
Permit Attachment G				
Attachment G.4, Table G.4-1	Footnotes	Administrative or informational change (Class 1)	Add to the footnotes of the table as follows: "MIBK = <u>methyl isobutyl ketone or 4-methyl-2-pentanone</u> " as used in the F-listings at 40 CFR § 261.31. 4-methyl-2-pentanone is a synonym for this chemical, and the addition clarifies the entry.	Yes
Attachment G.5, Section 2.0	2	Typographical error (Class 1)	Revise as, "...two transportainers (75 and 184 <u>194</u>)..."	Yes
Attachment G.5, Table G.5-1	Footnotes	Administrative or informational change (Class 1)	Add to the footnotes of the table as follows: " <u>MIBK = methyl isobutyl ketone or 4-methyl-2-pentanone</u> <u>DBCP = 1,2-dibromo-3-chloropropane</u> " to clarify the use of abbreviations within the table.	Yes
Attachment G.6, Figure G.6-2		Typographical error (Class 1)	Legend is revised to show "• Additional Sample Locations "	Yes
Attachment G.8, Section 2.0	2	Typographical error (Class 1)	Revise as, "...and eight sheds (sheds 144, 145, 147, <u>146,</u> 177, 1027, 1028, 1040, <u>1030,</u> and 1041)."	Yes

Section	Paragraph	Type of Change	Proposed Change	Approved
Attachment G.16, Section 2.0	5	Administrative or informational change (Class 1)	Delete this paragraph describing the loading dock and include this discussion in Attachment G.17, Section 2.0.	Yes
Table G.17-1	Footnotes	Administrative or informational change (Class 1)	Add to the footnotes of the table as follows: " <u>MIBK = methyl isobutyl ketone or 4-methyl-2-pentanone</u> <u>DBCP = 1,2-dibromo-3-chloropropane</u> " to clarify the use of abbreviations within the table.	Yes
<i>Permit Attachment I</i>				
Attachment I	Annual Submittals	Clarification (Class 1*)	Change of text to better reflect the requirement in Section 1.12 of the Permit. " Interested parties quire and e Compliation of <u>solicited</u> comments <u>from interested parties and communities and responses</u> ".	Yes ⁸
<i>Permit Attachment J</i>				
Attachment J, Table J-1	TA-16-388	Administrative or informational change (Class 1)	Change the following to reflect the current status of the unit. " Interim Status Unit not authorized to treat hazardous waste and undergoing closure <u>pending permit approval</u> "	No ⁹
Attachment J, Table J-1	TA-16-399	Administrative or informational change (Class 1)	Change the following to reflect the current status of the unit. " Interim Status Unit not authorized to treat hazardous waste and undergoing closure <u>pending permit approval</u> "	No ¹⁰
Attachment J, Table J-1	TA-50-69 Outdoor	Administrative or informational change (Class 1)	Total square footage of pad should be " 2,160 ". The dimensions of the pad in Attachment A and Attachment G.5 are 24 ft by 90 ft.	Yes ¹¹
Attachment J, Table J-1	TA-54 Area G Pad 1	Administrative or informational change (Class 1)	Total square footage of pad should be " approximately 76,000 " for consistency with the dimensions in Attachment A and the total in Attachment G.6.	Yes
Attachment J, Table J-1	TA-54 Area G Pad 3	Administrative or informational change (Class 1)	Total square footage of pad should be " approximately 17,000 ," for consistency with the dimensions in Attachment A and the total in Attachment G.7.	Yes

Section	Paragraph	Type of Change	Proposed Change	Approved
Attachment J, Table J-1	TA-54 Area G Pad 6	Administrative or informational change (Class 1)	Total square footage of the pad should be " approximately 62,700, " for consistency with the dimensions in Attachment A and the total in Attachment G.9.	Yes
Attachment J, Table J-1	TA-54 Area G Pad 9	Administrative or informational change (Class 1)	Storage Shed "57" should be " 574 " based on Figure 28 in Attachment N and Figure G.10-1.	Yes
Attachment J, Table J-1	TA-54 Area G Pad 10	Administrative or informational change (Class 1)	Total square footage should be " 89,600 " for consistency with the dimensions in Attachment A and the total in Attachment G.11.	Yes
Attachment J, Table J-1	TA-54 Area G Pad 11	Administrative or informational change (Class 1)	Total square footage should be " 65,500 " for consistency with Attachment A and Attachment G.12.	Yes ¹²
Attachment J, Table J-1	TA-54 Area G Storage Shed 8	Administrative or informational change (Class 1)	Total square footage for TA-54-8 should be " 640 " for consistency with the dimensions in Attachment A and Attachment G.13.	Yes
Attachment J, Table J-1	TA-54 Area G TA-54-33	Administrative or informational change (Class 1)	Total square footage for the unit should be " 8,570 " for consistency with the dimensions in Attachment A and Attachment G.14.	Yes ¹²
Attachment J, Table J-1	TA-54 Area L Outdoor Pad	Typographical error and Administrative or informational change (Class 1)	Change the text to better reflect that there is no storage canopy at Area L. Suggest "... and Storage Dome 215 (former Area 1); and Storage Canopy 216. " Total square footage for the unit should be " 110,500 " for consistency with Attachment G.15.	Yes ¹²
Attachment J, Table J-1	TA-55-4, K13	Administrative or informational change (Class 1)	Change text to better reflect that the operating capacity identified in Attachment A, Section A.5.3 is " 2,500 gal ", not "3,400 gal", as stated in Table J-1	Yes
Attachment J, Table J-1	TA-55-185	Typographical error (Class 1)	Change text to better reflect that the unit is located west of " TA-55-4 ", not "TA-54-4", as stated in Table J-1.	Yes
Attachment J, Table J-1	TA-55-4 Outdoor Pad	Typographical error (Class 1)	Change text to better reflect that the unit is located west of " TA-55-4 ", not "TA-54-4", as stated in Table J-1.	Yes
<i>Permit Attachment N</i>				
Figure 25		Typographical error (Class 1)	Entrance road to TA-54 should be corrected to "Mesita del Buey Road "	Yes

Section	Paragraph	Type of Change	Proposed Change	Approved
Figure 30		Typographical error (Class 1)	The figure has been revised to include Dome 48 that is located on the TA-54, Area G, Pad 3 permitted unit.	Yes
Figure 31		Typographical error (Class 1)	The two arrows in the upper right hand corner have been removed as they were not labeled.	Yes

*Class 1 modifications requiring prior New Mexico Environment Department approval

¹ Approved as a Class 1 – Administrative and informational change (Appendix I, A.1)

² Approved with modifications as a Class 1 requiring prior Department approval; the Department did not include the phrase “that provides comprehensive environmental data collected from in and around LANL.” Modified to simply state “public database.”

³ Approved with modifications as a Class 1 requiring prior Department approval; modified to deleted the entire parenthetical as it simply repeats the first part of the bullet

⁴ Approved with modifications as a Class 1 requiring prior Department approval; modified to state that the coating will have chemical resistance equivalent to urethane.

⁵ The proposed revisions may change the requirement and are therefore not a clarification of the requirement. The Permittees have not provided an adequate discussion of the reason that the changes are needed.

⁶ Approved with modifications as a Class 1 requiring prior Department approval; the proposed revision changed the wrong “shall” to “may.” Modified to change the last “shall” in Paragraph 3 to “may.”

⁷ Approved with modifications as a Class 1 – Correction of typographical errors (Appendix I, A.2); modified sentence for clarification.

⁸ Approved with modifications as a Class 1 requiring prior Department approval; modified to include the Permittees’ responses

⁹ The Permittees have not submitted an application to add TA-16-388 as a permitted unit, and therefore the unit is not pending permit approval.

¹⁰ The Permittees have submitted an Interim Status Closure Plan for TA-16-399, and therefore the unit is not pending permit approval.

¹¹ Approved with modifications as a Class 1 – Correction of typographical errors (Appendix I, A.2); also modified the unit description in Attachment A, Section A.3.2, to remove the following language: “with an additional strip of asphalt added to the southeast end that measure 12 feet in width and 90 feet in length.”

¹² While the proposed changes appear to increase the size of the Permitted Units, the modification is approved as a Class 1 – Administrative and informational change (Appendix I, A.1) in order to be consistent with the dimensions in other sections of the Permit.