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Date: **JUN 05 2019**  
Refer To: N3B-19-0154

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

**Subject: Class 1 Permit Modification Notification for Adding a Support Structure to Pad 11 for the Los Alamos National Laboratory Hazardous Waste Facility Permit, EPA ID No. NM0890010515**

Dear Mr. Kieling:

Enclosed is a Class 1 permit modification notification requiring approval from the New Mexico Environment Department's Hazardous Waste Bureau (NMED-HWB) to modify the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (the Permit) issued to the U.S. Department of Energy (DOE); Triad National Security, LLC; and Newport News Nuclear BWXT-Los Alamos, LLC (N3B) (the Permittees).

This permit modification is required under 40 Code of Federal Regulations (CFR) 270.42(a)(1) and 40 CFR 270.42, Appendix I, "Classification of Permit Modification," item A.1., Administrative and Informational Changes, in accordance with Permit Section 3.1(3). The Permittees are adding a personnel support (office) trailer to Pad 11, a permitted hazardous waste management unit, next to Dome 375 in Technical Area 54 Area G. This new trailer will be used to support waste management operations and will not be used to manage hazardous waste.

This Class 1 permit modification revises Figures 27 and 36 in Attachment N, "Figures"; and Figure G.12-1 in Attachment G, Section G.12, "Technical Area 54, Area G, Pad 11 Outdoor Container Storage Unit Closure Plan." Descriptions of the structure were added to Section A.4.2.9 in Attachment A, "Technical Area (TA) - Unit Descriptions," and Section 2.0 in Attachment G.12. A full description of the permit modification is included in Enclosure 1.

The Permittees' Class 1 permit modification consists of this letter and an enclosure containing a description of the permit modification, text edits of the Permit sections, the revised figures, and a signed certification page. This modification has been prepared in accordance with 40 CFR 270.42(a)(1).

A notification of this permit modification will be sent to the NMED-HWB-maintained LANL facility mailing list in accordance with 40 CFR 270.42(a)(1)(ii) within 90 days of incorporation of this permit modification request.

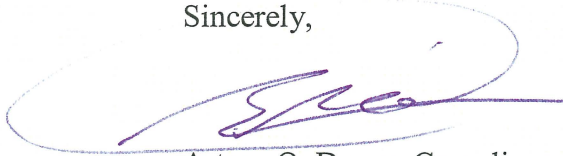
If you have comments or questions regarding this permit modification, please contact Emily Day at (505) 695-4243 (emily.day@em-la.doe.gov) or Arturo Duran at (505) 665-5330 (arturo.duran@em.doe.gov).

Sincerely,



Frazer Lockhart  
Program Manager  
Regulatory and Stakeholder Interface  
N3B-Los Alamos

Sincerely,



Arturo Q. Duran, Compliance and Permitting Manager  
Office of Quality and Regulatory Compliance  
Environmental Management  
Los Alamos Field Office

Enclosure(s): Three hard copies with electronic files – Class 1 Permit Modification Notification for Adding a Support Structure to Pad 11 for the Los Alamos National Laboratory Hazardous Waste Facility Permit, EPA ID No. NM0890010515 (EM2019-0174)

Cy: (letter and enclosure[s] emailed)  
Laurie King, EPA Region 6, Dallas, TX  
Siona Briley, NMED-HWB  
Neelam Dhawan, NMED-HWB  
Steve Yanicak, NMED-DOE-OB  
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N3B Records

Public Reading Room (EPRR and HPRR)

PRS Website

# **ENCLOSURE 1**

Class 1 Permit Modification Notification for Adding a Support  
Structure to Pad 11 for the Los Alamos National Laboratory  
Hazardous Waste Facility Permit, EPA ID No. NM0890010515

EM2019-0174



**Class 1 Permit Modification Notification for Adding a Support Structure to Pad 11 for the Los Alamos National Laboratory Hazardous Waste Facility Permit, EPA ID No. NM0890010515**

This document is a Class 1 permit modification notification for the Los Alamos National Laboratory Hazardous Waste Facility Permit (the Permit) issued by the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) to the U.S. Department of Energy (DOE); Triad National Security, LLC; and Newport News Nuclear BWXT-Los Alamos, LLC (N3B). The U.S. Environmental Protection Agency facility ID is NM0890010515. This Class 1 permit modification has been prepared in accordance with 40 Code of Federal Regulations (CFR) 270.42. This permit modification has been drafted for review and approval by NMED-HWB pursuant to 20.4.1.900 New Mexico Administrative Code (NMAC), incorporating 40 CFR 270.42.

**Proposed Permit Modification Summary**

The Permittees are adding a personnel support (office) trailer to Technical Area 54 (TA-54) Area G, Pad 11, outside Dome 375. The new office trailer will be used to support waste management operations at Pad 11 but will not be used to manage hazardous waste.

Attachment 1 contains the changes to the Permit Attachments A and G. Attachment 2 contains revised Figures 27 and 36 from Attachment N of the Permit and revised Figure G.12-1 from Attachment G of the Permit. Attachment 3 is the certification statement signed by DOE and N3B for this permit modification request as required by 20.4.1.900 NMAC, incorporating 40 CFR 270.42.

**Rationale for Proposed Modification**

This permit modification is required under 40 CFR 270.42(a)(1) and 40 CFR 270.42, Appendix I, "Classification of Permit Modification," item A.1., Administrative and Informational Changes, in accordance with Permit Section 3.1(3). The Permittees are adding a personnel support (office) trailer to Pad 11, a permitted hazardous waste management unit, next to Dome 375 in TA-54 Area G that will be used to support waste management operations.

**Discussion of Changes**

Descriptions of the trailer have been added to Section A.4.2.9 in Attachment A, "Technical Area (TA) - Unit Descriptions," and Section 2.0 in Attachment G.12, "Technical Area 54, Area G, Pad 11 Outdoor Container Storage Unit Closure Plan." Figures 27 and 36 in Attachment N, "Figures," have been revised; and Figure G.12.1 in Attachment G.12 has been revised.

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# **Attachment 1**

Redline Pages of Hazardous Waste Facility Permit,  
Attachments A and G





**ATTACHMENT A**  
**TECHNICAL AREA (TA) - UNIT DESCRIPTIONS**



equipped with a badge reader and is locked at all times unless used by authorized personnel for maintenance purposes.

#### **A.4.2.9 Pad 11**

This asphalt pad is approximately 4 inches thick, measures approximately 478 ft long by 137 ft wide, and is sloped approximately 1 to 2% to the southeast. Storage dome 375 is located on the western portion of pad 11 and is used for storage of hazardous, mixed low level, and mixed transuranic waste. It measures approximately 300 ft long by 100 ft wide (*see* Figure 36 in Attachment N (*Figures*)). The building is an aluminum A-frame truss design that is anchored to a concrete ring wall. The dome is of modular construction utilizing a membrane or fabric covering. It is equipped with 14 personnel doors and two roll-up doors, one each at the east and west ends of the building. Ramped entrances allow for safe movement of container handling equipment and vehicle access. Dome 375 contains a modular panel containment structure (approximately 120 feet long x 60 feet wide) used for size reduction, decontamination, segregation, waste assay, reclassification activities, and repackaging of transuranic waste prior to shipment offsite. Dome 375 also contains four structures that serve as an office area, a control area, and rooms for donning and doffing anti-contamination clothing. These structures are support structures and will not be used to store hazardous waste. There is a restroom trailer (approximately 15 feet long x 8.5 feet wide) and an office trailer (approximately 60 feet long x 36 feet wide) located on the south eastern portion of Pad 11.

#### **A.4.3 TA-54 West**

The two permitted units at TA-54 West include the indoor low bay and the high bay at TA-54-38 and the outdoor storage pad which surrounds the north, east, and south sides of TA-54-38 and the loading dock at TA-54-38. The permitted units at TA-54 West are used to store solid mixed low level and mixed transuranic waste (*see* Figure 37 in Attachment N (*Figures*)).

The permitted units at TA-54-38 West may receive any container that may be stored at the units in accordance with Permit Section 3.3 (e.g. 85-gallon drums, 100-gallon drums, and ten-drum overpacks); however, most often the units receive WIPP-ready 55-gallon drums and SWBs for final preparation and packaging. All waste containers are handled in a manner that will not cause them to rupture.

Waste is generally brought into the TA-54-38 West Outdoor Pad through the south-eastern vehicle gate and placed in storage on the northern portion of the TA-54-38 West Outdoor Pad. At the outdoor unit, waste is not stored in front of gates or within 10 feet of the fence line or within 60 feet of the building. No paved or unpaved roadways are located within 5 feet of the waste storage area. From the outdoor permitted unit, containers are generally moved into the Low Bay at TA-54-38 West and made amenable for placement in a WIPP-compliant shipping container. Normal operations for making the individual waste containers ready for shipment include stretch wrapping 14 drum configurations (or drum payloads) and ratchet strapping SWBs one on top of the other. Generally, these Type A container configurations are then moved by forklift into the High Bay where they are loaded into TRUPACT II Type B shipping containers using a bridge crane.



**ATTACHMENT G.12**  
**TECHNICAL AREA 54, AREA G, PAD 11**  
**OUTDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**



## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at Technical Area (TA)-54, Area G, Pad 11 at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions to the plan, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located the permitted unit and not discussed within the Permit are described below.

The permitted unit, which was constructed in 1998, is located in the western portion of Area G and consists of an asphalt pad that measures 478 feet long and 137 feet wide or approximately 65,500 square feet. It consists of four inches of asphalt built over underlying base course which overlies a minimum of six inches of tuff fill. It also has a dome (Dome 375).

The permitted unit is sloped from 1% to 2% to the south/southeast for drainage and has curbing on the south and east sides as well. Drainage is directed to a series of four 5 inch-wide by 27 foot-long drains, all connected to two underground 8-inch diameter polyvinyl chloride pipes which discharge to a concrete lined ditch located near the southeast corner of the pad.

The permitted unit stores hazardous waste in both liquid and solid form in Dome 375. The dome, which is an aluminum framework of trusses covered with tension-fitted ultraviolet resistant, fire-retardant coated, polyester fabric, is 300 feet long by 100 feet wide and covers a surface area of approximately 30,000 square feet. It is anchored with anchor bolts to the interior concrete ring wall and is equipped with two double-panel rolling doors, one at the east end of the dome and the other on the west end. It also has 14 personnel doors located approximately every 31 to 57 feet along the dome's length. These doors allow for adequate access both by vehicles and by personnel. The interior perimeter of the dome is surrounded by a concrete ring wall, which helps prevent run-on into and runoff from the dome. Asphalt ramps located at the vehicle entrances allow vehicles and container handling equipment to pass safely over the curb. Dome 375 contains a modular panel containment structure (approximately 120 feet long x 60 feet wide) used for size reduction, decontamination, segregation, waste assay, reclassification activities, and repackaging of transuranic waste prior to shipment offsite. Structure 124 C, a refrigeration unit that was connected to the roll up door opening of the modular panel containment structure, was removed and dispositioned in early 2018. The refrigeration unit measured 20 feet by 8 feet by 8.5 feet and was used for the remediated nitrate salt-bearing waste campaign. There is a restroom trailer (approximately 15 feet long x 8.5 feet wide) and an office trailer (approximately 60 feet long x 36 feet wide) located on the south-eastern portion of Pad 11. A transportainer that is used for the storage of tools and equipment, not for the management of hazardous waste, is also located on the Pad, east of Dome 375.

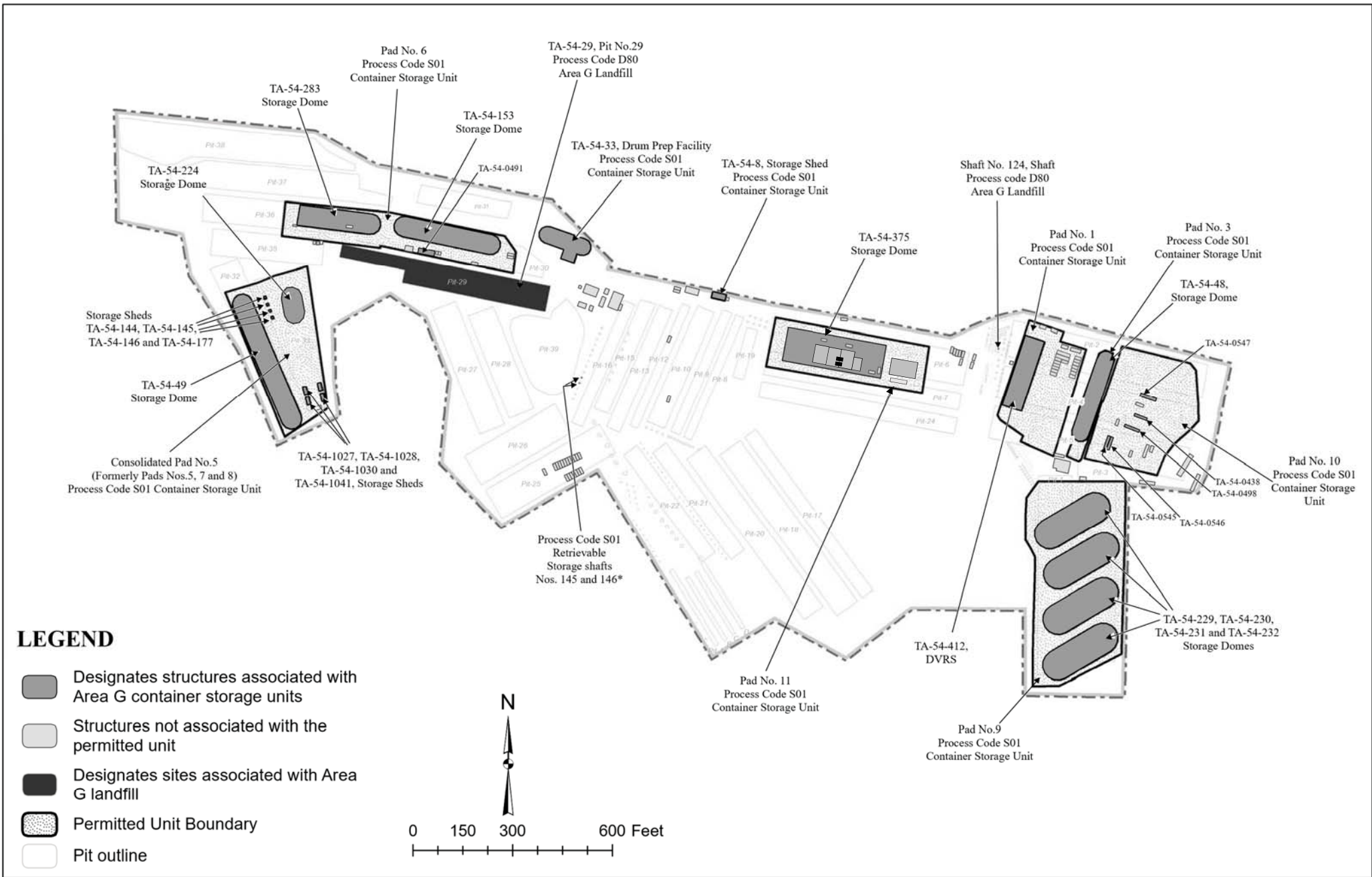




## **Attachment 2**

Revised Attachment N, Figures 27 and 36,  
and Attachment G, Figure G.12-1





Map created May 2019

**Figure 27: Technical Area 54, Area G, Container Storage Units**

Disclaimer: This map was created for work processes associated with the LLCC. All other uses for this map should be confirmed with N3B staff.

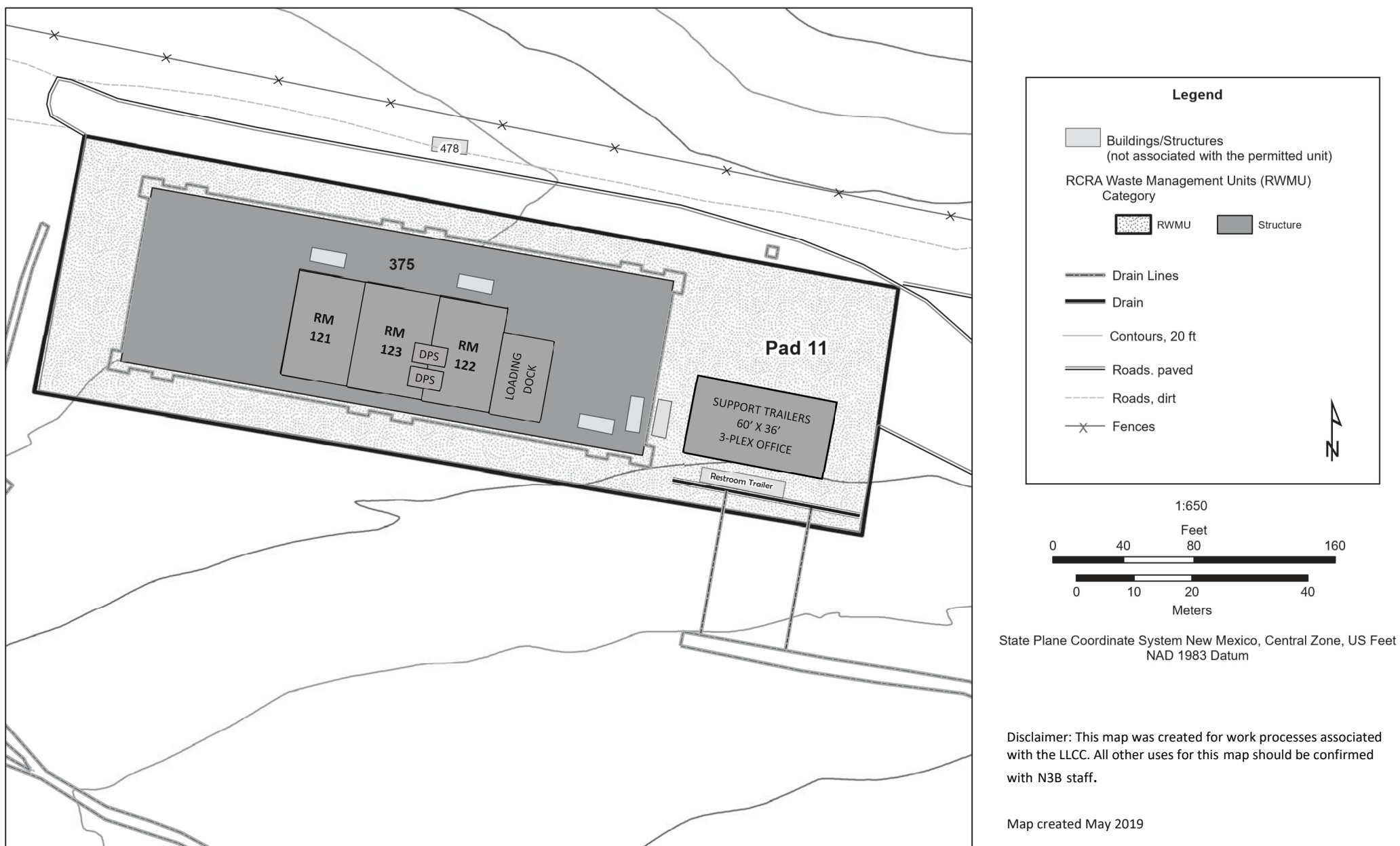
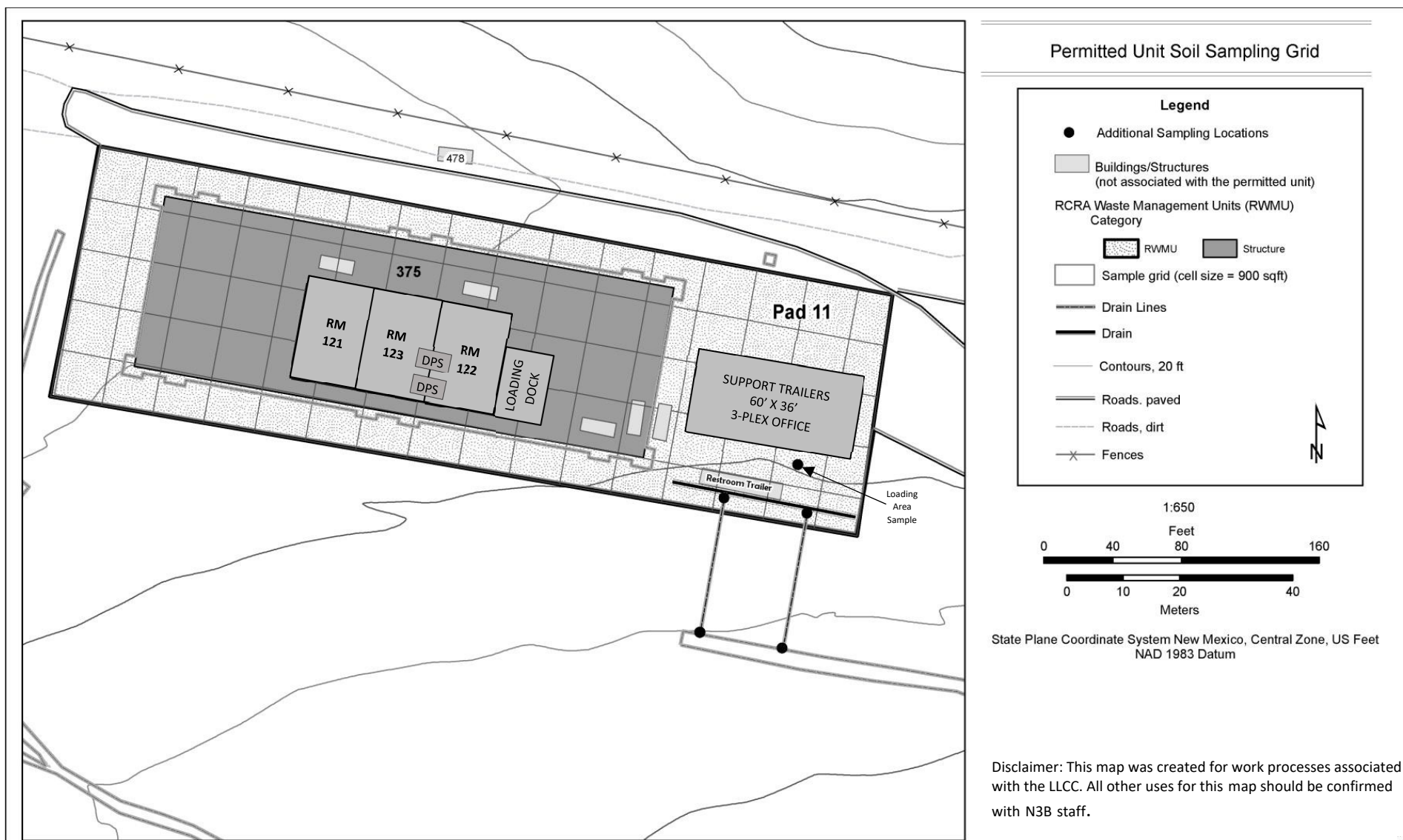


Figure 36: TA-54, Area G, Pad 11



**Figure G.12-1:** Technical Area 54, Area G, Pad 11 Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations



# **Attachment 3**

## Certification Statement





**CERTIFICATION**

**NEWPORT NEWS NUCLEAR BWXT-LOS ALAMOS, LLC**

**CERTIFICATION STATEMENT OF AUTHORIZATION**

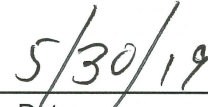
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In accordance with the New Mexico Administrative Code Title 20, Chapter 4, Part 1 (incorporating the Code of Federal Regulations, Title 40 CFR § 270.11):

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Frazer Lockhart, Program Manager  
Regulatory and Stakeholder Interface  
Newport News Nuclear BWXT-Los Alamos, LLC



Date



Arturo Q. Duran, Compliance and Permitting Manager  
Office of Quality and Regulatory Compliance  
Environmental Management  
Los Alamos Field Office



Date

