



ESHID-602740

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Los Alamos National Laboratory
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National Nuclear Security Administration
Los Alamos Field Office
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Date: **NOV 28 2017**
Symbol: EPC-DO: 17-466
LA-UR: 17-30342
Action Item No.: N/A

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

Subject: Los Alamos National Laboratory Hazardous Waste Facility Permit Instances of Noncompliance and Releases for Fiscal Year 2017

Dear Mr. Kieling:

The purpose of this letter is to transmit to the New Mexico Environment Department-Hazardous Waste Bureau a report required by Section 1.9.14 of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (the Permit). The report, included as Enclosure 1, lists instances of noncompliance with the Permit and any releases at or from a permitted unit that did not pose a threat to human health or the environment. From October 1, 2016 through September 30, 2017 there were no releases within or from a permitted unit.

If you have questions regarding this report or would like to discuss in further detail, please contact Mark Haagenstad (LANS) at (505) 665-2014, or Karen Armijo (DOE) at (505) 665-7314.

Sincerely,

John C. Bretzke
Division Leader

Sincerely,

Karen E. Armijo
Permitting and Compliance Program Manager

Mr. John E. Kieling
EPC-DO: 17-466

- 2 -

JCB/KEA/MPH/FDN:am

Enclosure(s): 1) Fiscal Year 2017 Reporting of Instances of Noncompliance and Releases with the Los Alamos National Laboratory Hazardous Waste Facility Permit

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New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
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If you have questions regarding this report or would like to discuss in further detail, please contact Mark Haagenstad (LANS) at (505) 665-2014, or Karen Armijo (DOE) at (505) 665-7314.

Sincerely,

John C. Bretzke
Division Leader

Sincerely,

Karen E. Armijo
Permitting and Compliance Program Manager

CERTIFICATION

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.



John C. Bretzke
Division Leader
Environmental Protection and Compliance Division
Los Alamos National Security, LLC

11-15-17

Date Signed



Karen E. Armijo
Permitting and Compliance Program Manager
National Nuclear Security Administration
Los Alamos Field Office
U.S. Department of Energy

16 Nov 2017

Date Signed

ENCLOSURE 1

**Fiscal Year 2017 Reporting of Instances of Noncompliance and
Releases Los Alamos National Laboratory
Hazardous Waste Facility Permit**

EPC-DO: 17-466

LA-UR-17-30342

Date: NOV 28 2017

Fiscal Year 2017 Reporting of Instances of Noncompliance and Releases

Los Alamos National Laboratory Hazardous Waste Facility Permit

Introduction

This report has been prepared by the US Department of Energy and Los Alamos National Security, LLC (DOE/LANS), collectively the Permittees, to meet a reporting requirement of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (the Permit). Permit Sections 1.9.13 and 1.9.14 require reporting of any non-threatening release of hazardous waste or constituents from or at a permitted unit, and all instances of noncompliance with the Permit. This report must be submitted by December 1 of each year.

This report addresses releases and instances of noncompliance information from October 1, 2016 through September 30, 2017. There were no releases during this timeframe, and none of the instances of noncompliance detailed within this report posed a potential threat to human health or the environment.

Facility Information

Owner and Operator:
United States Department of Energy
3747 West Jemez Road, MS A316
Los Alamos, NM 87544

Co-Operator:
Los Alamos National Security, LLC.
PO Box 1663
Los Alamos, NM 87545

Facility:
Los Alamos National Laboratory
Bikini Atoll Road, SM-30
Los Alamos, NM 87545

Releases from or at a Permitted Unit

During the reporting time frame (October 1, 2016 through September 30, 2017), there were no releases within or from a permitted unit.

Instances of Noncompliance with the Permit

From October 1, 2016 through September 30, 2017, there were 25 instances of noncompliance with the Permit; these occurrences are listed in Table 1. Additional instances of noncompliance for this time frame and from past activities at the facility were communicated to the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) in a letter dated March 8, 2017, *Request for Extension of*

Alternative Inspection Requirements for Shed 1028 at Technical Area 54, Area G, Pad 5 (EPC-DO: 17-117/LA-UR-17-21644).

Efforts to correct issues identified during transuranic waste extent of condition assessments in 2015 and early 2016 continued throughout the 2017 fiscal year. An integrated project team was tasked with a three phased project to review all operating record data, field verify electronic data, and correct data found to be inaccurate. Steps taken to ensure an accurate operating record included the re-characterization of discrepant waste items/containers and the creation of new waste stream profiles, resulting in updated waste inventory reports and relabeling activities. In addition, the Permittees continue to work towards developing additional qualifications and training requirements for waste management personnel to improve understanding and knowledge of requirements of the Permit. The Laboratory has also developed improved waste management tools to ensure operating record compliance with the Permit, and is working with waste workers and waste management personnel to identify and implement corrective actions that will minimize and/or prevent recurrence of instances of noncompliance with the Permit.

Table 1: Fiscal Year 2017 Noncompliance Report

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances of Noncompliance	Period of Noncompliance	Steps Taken to Resolve
10/11/2016 5/15/2017 6/2/2017 9/26/2017	Technical Area 50, Building 69	Six containers of mixed waste were missing a "hazardous waste" label. This is a noncompliance of Permit Section 3.6(1).	6 Containers	4	10/11/2016 - 10/13/2016 5/15/2017 - 5/17/2017 6/2/2017 - 6/5/2017 9/26/2017 - 9/28/2017	"Hazardous Waste" labels were applied to the containers.
6/27/2017	Technical Area 50, Building 69	Failure to maintain the required 24 inches of aisle space. This is a noncompliance of Permit Section 3.5.1(1).	N/A	1	6/27/2017 - 6/29/2017	The aisle space in the area was restored to the required 24 inches.
1/31/2017	Technical Area 50, Transportainer 75	Failure to maintain the required emergency egress aisle spacing of 24 inches at personnel doors. This is a noncompliance of Permit Section 3.5.1(1).	N/A	1	1/31/2017 - 2/10/2017	The aisle space in the area was restored to the required 24 inches.
2/13/2017	Technical Area 54, Area G, Pad 1	Failure to protect two hazardous waste containers that were stored outdoors from contact with precipitation. This is a noncompliance of Permit Section 3.5.1(5).	2 Containers	1	2/13/2017 - 2/15/2017	Precipitation was removed and a rain cap was placed over the containers.
5/4/2017	Technical Area 54, Area L, Building 39	One container of hazardous waste was missing an accumulation start date on the label. This is a noncompliance of Permit Section 3.6(1).	1 Container	1	5/4/2017 - 5/8/2017	The accumulation start date was written on the label.
12/17/2016	Technical Area 54, Area L, Building 39	Two waste containers were stored at the facility for longer than one year. This is a noncompliance of Permit Section 2.3.1.	2 Containers	2	12/17/2016 - 2/18/2017 12/17/2016 - 4/12/2017	The containers were shipped offsite for disposal.
8/29/2016	Technical Area 55, PF-4, Room 401	Weekly inspections for the tank and stabilization units were not documented correctly on the inspection record form. This is a noncompliance of Permit Section 2.6.1.	N/A	1	8/29/2016 - 1/22/2017	A memo to file was prepared and added to the operating record to address the error on the inspection record form. A Lessons Learned was developed and presented to the individuals who conduct the inspections.
10/19/2016	Technical Area 03, Building 29, Room 9020	A container holding liquid was found to be missing a "free liquids" label and was not stored on secondary containment. This is a noncompliance of Permit Section 3.6(2) and 3.7.1(1), respectively.	1 Container	1	10/19/2016 - 10/19/2016	A "Free Liquids" label was applied to the container, and secondary containment was obtained.
11/10/2016	Technical Area 55, PF-4, Room 401	A required daily hazardous waste inspection of the Hazardous Waste Tank System was not completed on a day off associated with a Holiday. This is a noncompliance of Permit Section 2.6.1.	N/A	1	11/10/2016 - 11/10/2016	Communications were sent to TA-55 management requesting their increased awareness on conducting inspection on days off.
1/9/2017	Technical Area 55, PF-4, Room 401	A required weekly hazardous waste inspection of the stabilization unit was not completed. This is a noncompliance of Permit Section 2.6.1.	N/A	1	1/9/2017 - 1/23/2017	A memo to file was prepared and added to the operating record to address the missing information on the inspection record form. A Lessons Learned was developed and presented to the individuals who conduct the inspections.

Table 1: Fiscal Year 2017 Noncompliance Report

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances of Noncompliance	Period of Noncompliance	Steps Taken to Resolve
8/15/2017	Technical Area 55, PF-4, Room B40	Waste generator personnel were unable to return a container undergoing bung replacement to the permitted container storage unit B40, due to the room being evaluated by Radiological Control Technicians. This is a noncompliance of Permit Section 3.13.1.	1 Container	1	8/15/2017 - 8/16/2017	The container was moved back into the container storage unit after the assessment by the Radiological Control Technicians was completed.
8/29/2017 12/5/2016 12/6/2016 3/9/2017 5/11/2017	Technical Area 55, PF-4, Room 401	Waste generator personnel were unable to conduct the required daily hazardous waste inspections in Room 401 (Hazardous Waste Tank System) due to the room being evaluated by Radiological Control Technicians. This is a noncompliance of Permit Section 2.6.1.	N/A	5	8/29/2017 - 9/27/2017 12/5/2016 - 12/5/2016 12/6/2017 - 12/7/2017 3/9/2017 - 3/16/2017 5/11/2017 - 6/26/2017	Inspections resumed after the assessment by the Radiological Control Technicians was completed.
11/2/2017	Not Applicable	In fiscal year 2017, there were four instances in which correspondence from the Permittees to the NMED-HWB was not placed in the LANL Public Reading Rooms (electronic or hardcopy) within the 10 days as required by Permit Section 1.10.	N/A	4	N/A	Correspondence was placed in the LANL Public Reading Rooms. Various schedule interruptions increased the length of time for submittal to the LANL Public Reading Rooms. More careful planning will be undertaken to avoid this issue in the future.
11/2/2017	Not Applicable	In fiscal year 2017, there was one instance in which electronic mail (email) notification, required by Permit Section 1.15, was not conducted within 7 days.	N/A	1	N/A	Electronic mail notification was sent to the persons on the e-mail notification list. More careful planning will be undertaken to avoid this issue in the future.