ERID-262536

Environmental Protection Division
Environmental Compliance Programs (ENV-CP)
PO Box 1663, K490
Los Alamos, New Mexico 87545
Phone: (505) 667-0666/Fax: (505) 667-1945

National Nuclear Security Administration
Los Alamos Field Office, A316
3747 West Jemez Road
Los Alamos, New Mexico, 87545
Phone: (505) 667-5794/Fax (505) 667-5948

Date: OCT 2 3 2014
Symbol: ENV-DO-14-0287
LAUR: 14-27604
Locates Action 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

Dear Mr. Kieling:

Subject: **Transmittal of Class 1 Permit Modification to Make Updates at Technical Area 54, West Indoor Unit in the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, EPA ID No. NM0890010515**

The purpose of this letter is to submit a Class 1 permit modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit) issued to the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) in November 2010. The permit modification provides revisions to figures in Permit Attachments N and G.16 and updates descriptions that are related to figure changes in Permit Attachments A and G.16.

The proposed changes have been prepared in accordance with the Code of Federal Regulations, (40 CFR) §270.42(a). This Class 1 permit modification consists solely of administrative changes in accordance with 40 CFR §270.42, Appendix I, Item A.1, and Permit Section 3.1(3).

This permit modification notification includes this transmittal letter and an enclosure with a description of changes; pages of the revised portions of Attachment A and G.16; as well as replacement figure and added figure for both Attachments N and G.16 of the Permit (LA-UR-14-27604). Accordingly, a signed certification page has also been included.

Included herein are three hardcopies and one electronic copy of this submittal. The hardcopy submittal contains pages or sections where text has been changed rather than copies of the entire collection of the Permit attachments. The electronic copy contains a reproduction of the hardcopy in portable document format (PDF) along with the word processing files used to create the hardcopy.

Notification of this modification will be sent to the New Mexico Environment Department-Hazardous Waste Bureau maintained LANL facility mailing list in accordance with 40 CFR § 270.42(a)(1)(ii) within ninety days of the transmittal of this permit modification.

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

Sincerely,

Alison M. Dorries
Division Leader
Environmental Protection Division
Los Alamos National Security LLC

Sincerely,

Kimberly Davis Lebak
Manager
Los Alamos Field Office
U.S. Department of Energy

AMD/KDL/MPH:kt

Enclosures: (1) Permit Modification Notification to Make Updates at Technical Area 54, West Indoor Unit in the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, EPA ID No. NM0890010515

Cy:

Laurie King, USEPA/Region 6, Dallas, TX (E-File)
Dave Cobrain, NMED/HWB, Santa Fe, NM, (E-File)
Tim Hall, NMED/HWB, Santa Fe, NM, (E-File)
Peter Maggiore, LASO-EP, (E-File)
Gene E. Turner, LASO-EP, (E-File)
Kirsten Laskey, LASO-GOV, (E-File)
Carl A. Beard, PADOPS, (E-File aosburn@lanl.gov)
Michael T. Brandt, ADESH, (E-File)
Raeanna Sharp-Geiger, ADESH, (E-File)
Alison M. Dorries, ENV-DO, (E-File)
Rick A. Alexander, EWMO-DO, (E-File)
James S. Clemmons, LTP, (E-File)
Kathryn M. Roberts, REG-SP, (E-File)
Andy R. Baumer, EWMO-DO, (E-File)
Anthony R. Grieggs, ENV-CP, (E-File)
Mark P. Haagenstad, ENV-CP, (E-File)
Angela M. Martinez, ENV-CP, (E-File)
Elizabeth W. English, REG-SP, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
locatesteam@lanl.gov, (E-File)
env-correspondence@lanl.gov, (E-File)

Los Alamos
NATIONAL LABORATORY
EST 1943

COPY

Environmental Protection Division
Environmental Compliance Programs (ENV-CP)
PO Box 1663, K490
Los Alamos, New Mexico 87545
Phone: (505) 667-0666/Fax: (505) 667-1945

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This permit modification notification includes this transmittal letter and an enclosure with a description of changes; pages of the revised portions of Attachment A and G.16; as well as replacement figure and added figure for both Attachments N and G.16 of the Permit (LA-UR-14-27604). Accordingly, a signed certification page has also been included.

ENCLOSURE 1

Permit Modification Notification to Make Updates at Technical Area 54, West Indoor Unit in the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, EPA ID No. NM0890010515

ENV-DO-14-0287

LA-UR-14-27604

Date: OCT 2 3 2014

Permit Modification Notification

This document contains a notification for a Class 1 Permit Modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit) issued to the Department of Energy and the Los Alamos National Security, LLC, collectively known as the Permittees, in November 2010. All proposed changes are shown in redline strikeout for Permit Attachments A and G.16. These changes as well as the replacement figures for Attachments N and G.16 are enclosed as Attachment 1 to this modification. Attachment 2 includes a certification page for this permit modification.

Description

This Class 1 Permit Modification revises the following: a figure in Attachment N (Figure 37); descriptions to Section 2.1 of the closure plan; a figure to Attachment G.16 *Technical Area 54 West, Building 38 Indoor Container Storage Unit Closure Plan*; and adds descriptions of the fire protection drain lines to Section A.4.3.1 in Attachment A, *TA- Unit Descriptions.* The most recent version of Figure 37 that was submitted on June 10, 2014 was used to update these changes and to create the new figure in the closure plan.

Basis

This modification has been prepared in accordance with Code of Federal Regulations, Title 40 §270.42 Appendix I, Item A.1, and with Permit Section 3.1(3).

Discussion of Changes

This modification adds drain lines within and to the outside perimeter of TA-54-38 that flow to a collection system outside of the unit boundary. The system was designed to collect firefighting and fire suppression water releases from TA-54-38 and is designed to discharge the fire water directly to a fire water retention pond, per DOE-STD-1066-2012 and NFPA 801. The RANT fire water retention pond has been sized for a holding volume to exceed a 30 minute fire suppression water discharge. A collection trench collects the fire water and travels through an underground pipeline that discharges into a fire water retention pond. The pipeline is sloped to provide gravity flow. The water collected in the pond is then sampled prior to release.

Text has been added to A.4.3.1 for consistency with the drain and fire water collection requirements at the TA-63 Transuranic Waste Facility (TWF). Sampling locations and the depiction of the drain lines in Figure G.16-2 and Figure 37 have been modeled after the Figure G.10-1 and Figure 28 for TA-54, Area G, Pad 9. Attachment N, Figure 37 has been updated to reflect the pond and drain lines and Figure G.16-2 has been added to reflect the drain lines and sampling locations for those drain lines at the time of closure.

Attachment 1

Revisions and Figure Updates for Attachments A, G.16 and N

ATTACHMENT A

TECHNICAL AREA (TA) - UNIT DESCRIPTIONS

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.

Empty TRUPACT II containers that are received from WIPP are usually moved into the High Bay using the western bay door and are opened and inspected prior to waste being placed within the High Bay. After the containers are opened, the drum payloads or SWBs are placed into the containers. The TRUPACT II containers are then closed. Metal loading platforms allow for personnel access to the top of the TRUPACT II containers so that the TRUPACT II containers can be opened or closed, and to ensure that there is no issue while placing the shipping containers within the TRUPACT II containers.

After the TRUPACT II containers are loaded and the trailer is prepared for shipment, the trailer is moved via trailer jockey or other approved vehicle through the eastern bay door and to the TA_54-38 West Outdoor Storage Pad for storage prior to shipment to WIPP or out the southeastern gate of the TA-54-38 West Outdoor Pad to a staging area to await inspection and shipment to WIPP. When a loaded trailer of TRUPACT II containers is stored at the TA-54-38 West Outdoor Pad, the trailer is not placed in front of a gate and is not stored within 10 feet of the fence line. Gates at the TA-54-38 West Outdoor Pad are locked when not in use.

Containers are handled with forklifts (using drum grapplers, when appropriate) or drum dollies while present at TA-54-38 West and are placed directly in the appropriate permitted unit when active packaging is not underway. The bridge crane is utilized in the High Bay to place drum payloads directly into the TRUPACT II containers. A second bridge crane provides redundancy and ensures that a back-up crane is available while the original is undergoing maintenance activities. A switch mechanism ensures that only a single crane will be used at one time.

A.4.3.1 TA-54 West Building (RANT)

TA-54-38 is a building constructed of 36-ft-high pre-cast concrete panel walls topped by pre-stressed double-T concrete roof sections. Its foundation consists of a 6-inch reinforced concrete slab on compacted fill. The building is divided into several offices and houses the Indoor permitted unit which includes the low bay and the high bay (*see* Figure 37 in Attachment N (*Figures)*). The low bay is approximately 40 ft-wide and 34 ft long. An 8 ft-wide by 12 ft-high roll-up door is located at the east end and opens to an outdoor loading dock. A second 8-ft-wide by 12-ft-high roll-up door is located in the southeast corner and opens into the high bay. The walls and floor of the low bay are coated with industrial grade

enamel paint. The high bay, approximately 40 ft wide and 80 ft long, is used for loading transuranic and mixed transuranic waste into Transuranic Package Transporter-II containers. It is equipped with 14-ft-wide by 18-ft-high roll-up doors on the east and west ends to allow convenient, indoor loading of the tractor-trailers that transport shipments of waste to the Waste Isolation Pilot Plant. The high bay floor is not painted and slopes at an angle of 1.5 degrees toward a central trench (which is 5 inches wide, 6 inches deep and 50 ft long) and a sump. The entire length of the trench is covered with a metal grate and is designed to hold precipitation and snow melt from tractor-trailers.

Outside the perimeter of TA-54-38 is a fire water collection system that collects water from TA-54-38 and transports it to a fire water retention pond. The system is not intended for, nor was it designed to provide secondary containment of liquid waste releases. It was designed to capture fire water releases from the building and convey the fire water in an underground pipe that discharges into the fire water retention pond.

Within 24 hours of a fire event, the Permittees shall collect a sample of fire suppression water collected in the retention basin and analyze it for any hazardous waste constituents managed at the facility. If the fire suppression water present in the retention basin is determined to be hazardous waste, the Permittees shall manage the waste water as required by Attachment D, *Contingency Plan*. The Permittees shall use the analytical results, together with information from the Operating Record, to characterize the water in accordance with Permit Attachment C, *Waste Analysis Plan*. The Permittees shall record the type and quantity of waste water present in the retention basin, the date of the incident, and the date of removal of the waste water in the Operating Record. If the Permittees determine that the fire suppression water is not a hazardous waste, the Permittees shall ensure the water meets the applicable clean-up requirements in Permit Section 11.4.3, *Surface Water Clean-up Levels*, prior to discharge.

A.4.3.2 TA-54 West Outdoor Pad

The outdoor permitted asphalt pad (which is approximately 4 inches thick and slopes toward the curbed edges to allow for storm water runoff (*see* Figure 37 in Attachment N (*Figures)*) consists of the loading dock at TA-54-38 and the storage pad located on the north, east, and south sides of TA-54-38. The loading dock is 16 ft wide by 38 ft, 10 inches long and is covered by a metal awning. The loading dock is constructed of 6-inch cast-in-place concrete and is located approximately 4 inches above grade. The boundary of the storage pad is delineated by the fence surrounding the pad. The canopy located on the pad and approximate dimensions of the pad are shown on Figure 37. Storage sheds for supplies and equipment are also located on the pad at the outdoor permitted unit (*see* Figure 37 in Attachment N (*Figures)*).

The Permittees shall coordinate shipments with WIPP in an attempt to minimize the use of excess storage capacity at the outdoor pad. However, the Permittees may utilize excess storage capacity for up to 59 days as specified in Attachment J, Table J-1, when at least one of the

ATTACHMENT G.16
TECHNICAL AREA 54 WEST, BUILDING 38
INDOOR CONTAINER STORAGE UNIT
CLOSURE PLAN

1.0 INTRODUCTION

This closure plan describes the activities necessary to close the indoor hazardous waste container storage unit that is comprised of the High Bay and Low Bay rooms located at Technical Area 54 West, Building 38 (TA-54-38) 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, 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, 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 at the permitted unit and not discussed elsewhere within the Permit are described below.

The permitted unit is comprised of the entire High Bay (Room 101) and the entire Low Bay (Room 102). Access between the two bays is provided through a 2.4 meter (m) wide by 3.8 m high roll-up door.

The High Bayhas been used to store fiberglass-reinforced plywood boxes, standard waste boxes (SWBs), B25 boxes, and drums of various sizes, is 40 feet (ft) wide and 80 ft long. It is equipped with a 5-ton capacity bridge crane system and back-up crane, a truck-axle weighing scale, loading platforms, and TRUPACT–II and HalfPACT lid stands. The floor is a 6-inch, reinforced, epoxy-coated, concrete slab which gently slopes toward a central 50-ft trench and a sump. The sump is locked out and a pipe plug has been installed. The floor has a grated drain (approximately five (5) inches (in.) wide by 57 ft long) that runs down the center of the bay which collects melting snow and water from the trucks that enter the bay. The permitted container storage area within the High Bay is used as a transuranic (TRU) waste payload-container assembly area and TRUPACT-II/HalfPACT shipper-container loading area. Its primary function is the preparation of waste packages for transport to the Waste Isolation Pilot Plant (WIPP). The TRU waste packaged in the High Bay is predominantly radioactive, but can include mixed waste.

The Low Bay, where waste drums of various sizes are stored, is 40 ft long by 34 ft wide; it was once used for staging hazardous solid and liquid waste while nondestructive radioassay waste characterization activities were performed. The floor is a 6-inch reinforced concrete slab coated with industrial grade enamel paint.

The permitted unit began hazardous waste operations in 1995 when testing of radioassay equipment occurred. Shipments of waste packages from the facility to the WIPP began in 1999. The building was

constructed in 1989 and 1990. Specific hazardous waste constituents stored at the permitted unit are included in Tables G.16-1 and G.16-2.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan)* include information about waste management procedures and hazardous waste constituents stored at the permitted unit.

2.1 Water Collection System

The permitted unit has a fire water collection system that collects water from TA-54-38. The system was designed to collect firefighting and fire suppression water releases from TA-54-38 and discharge the fire water directly to the fire water retention pond. A collection trench around the perimeter of TA-54-38 captures the fire suppression water and firefighting water released from the building, and conveys the fire water in an underground pipeline that discharges into a fire water retention pond. The pipeline is sloped to provide gravity flow.

3.0 ESTIMATE OF MAXIMUM WASTE STORED

Approximately 612,755 gallons of waste has been stored at the permitted unit since 1995. Throughout the life of this permit, it is estimated that an additional 440,000 gallons of waste will be stored at the permitted unit. The maximum inventory of hazardous waste that will be stored at the unit at any given time is 4,950 gallons as required by Permit Attachment J (*Hazardous Waste Management Units*).

4.0 GENERAL CLOSURE INFORMATION

4.1 Closure Performance Standard

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

a. remove all hazardous waste residues and hazardous constituents; and

b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of 10^{-5} for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;

d. minimize the need for further maintenance;

e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and

5.3.2 Decontamination of Structures and Related Equipment

Decontamination of the permitted unit's surfaces and equipment will include all features located within the unit (*e.g.*, drain grates, ladders). The following equipment located at the permitted unit is expected to be left in place and therefore decontaminated: the man lift; the lid stands; the drum wrapper; the portion of the bridge cranes that comes into contact with waste containers; and the floor scales.

The permitted unit's floors and walls (up to 11 ft) will be decontaminated. Decontamination of the permitted unit will be conducted by first removing loose material (*e.g.*, dust, dirt) through sweeping followed by pressure washing or steam cleaning with a solution consisting of a surfactant detergent (*e.g.*, Alconox®) and water mixed in accordance with the manufacturer's recommendations.

Ceilings of the permitted unit, walls above 11 ft, and the areas outside of the permitted unit will be presumed to be free of contamination unless there is some physical indication of contamination (*e.g.*, staining), the records review reveals that large amounts of liquid volatile or semi-volatile organic hazardous waste was stored in the permitted unit, or a spill or release occurred within the permitted unit that could have affected the ceiling or the walls above 11 ft.

Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

The floor drain in the High Bay will be plugged before decontamination activities begin to ensure that none of the wash water solution enters the drain located on the floor.

5.4 Equipment Used During Decontamination Activities

Reusable protective clothing, tools, and equipment used during closure decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.16-4 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

6.0 SAMPLING AND ANALYSIS PLAN

This SAP addresses the specific requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

6.1 Decontamination Verification Sampling Activities

Decontamination verification sampling activities, and soil sampling if applicable, will be conducted at the permitted unit in order to verify that surfaces and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of:

a. nine wipe samples from the High Bay (*see* Figure G.16-1):

1. four from the floor;

2. one from each wall; and

3. one from the sump;

b. six wipe samples from the Low Bay (*see* Figure G.16-1):

1. two from the floor; and

2. one from each wall

c. The captured fire suppression and firefighting water released from the building conveys in an underground pipeline that discharges into a fire water retention pond. In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of soil samples in the following location:

1. One sample at the joints and intersections of the fire water collection system piping

If liquid is found in the sump in the High Bay at the time of the assessment, liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit.

6.2 Sample Collection Procedures

Samples will be collected in accordance with Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

6.2.1 Liquid Sampling

Liquid samples will be collected and analyzed to determine if residual hazardous constituents remain in the drain at the permitted unit. Liquid samples will be collected using glass or plastic tubes, a composite liquid sampler, a bacon bomb, a bailer, or by pouring liquid in sample containers.

6.2.2 Wipe Sampling

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on the surfaces and related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100-square-centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

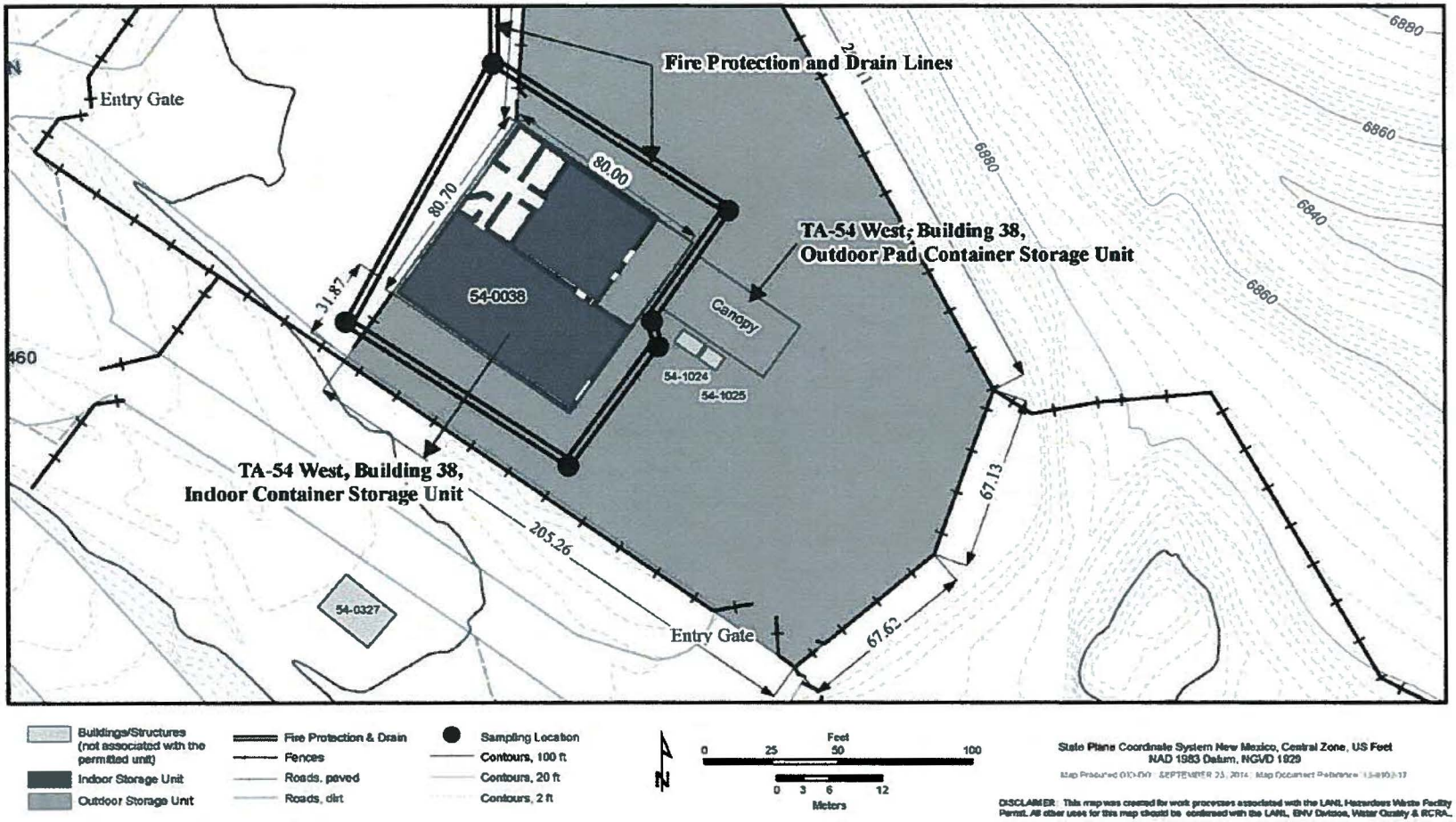

Figure G.16-2: Technical Area 54, Building 38 (High and Low Bay) Additional Sampling Locations

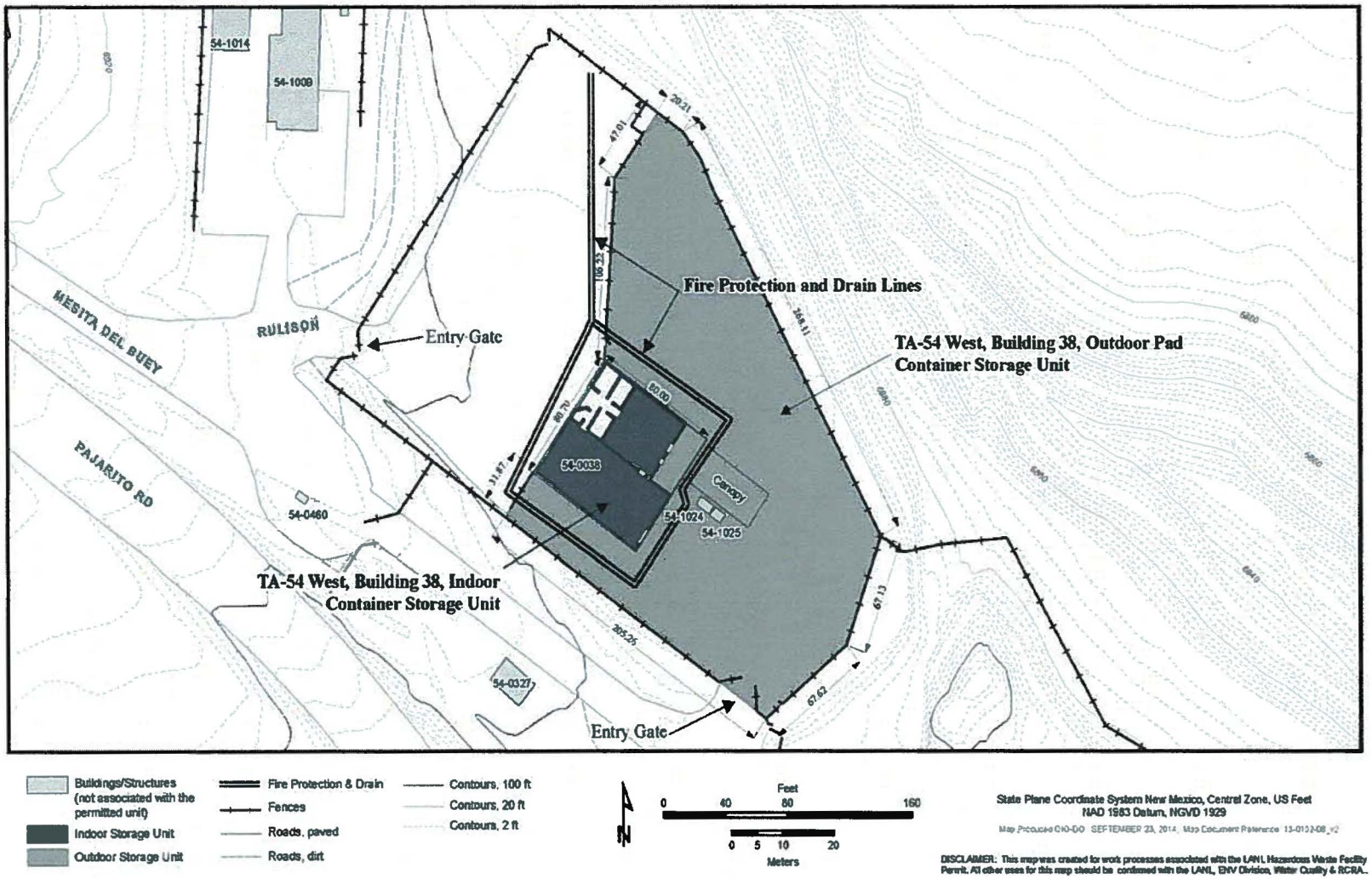

Figure 37: Technical Area (TA) 54 West, Building 38 Indoor (High Bay and Low Bay) and Outdoor Pad

Attachment 2

Certifications

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.

10/14/14

Alison M. Dorries
Division Leader
Environmental Protection Division
Los Alamos National Laboratory
Operator

Date Signed

10/22/14

Kimberly Davis Lebak
Manager, Los Alamos Field Office
National Nuclear Security Administration
U.S. Department of Energy
Owner/Operator

Date Signed