MICHELLE LUJAN GRISHAM
Governor

HOWIE MORALES
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
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ESHID-603362

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 15, 2019

William S. Goodrum, Manager
National Nuclear Security Administration
Los Alamos Field Office
LANL MS-A316
3747 West Jemez Road
Los Alamos, NM 87544

Enrique Torres, Division Leader
Environment Protection & Compliance Division
Triad National Security, LLC
P.O. Box 1633, MS-K491
Los Alamos, NM87545

U1900052

RE: APPROVAL WITH MODIFICATIONS
NOTIFICATION OF A CLASS 1 PERMIT MODIFICATION TO THE FACILITY PERMIT WASTE ANALYSIS PLAN
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-18-050

Dear Messrs. Goodrum and Torres:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and Los Alamos National Security, LLC (LANS)'s *Notification of a Class 1 Permit Modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit Waste Analysis Plan* (Modification) dated and received September 26, 2018, referenced by EPC-DO-18-291/LA-UR-18-27810.

When this Modification was submitted, DOE, LANS, and Newport New Nuclear BWXT (N3B), were the Permittees for the Los Alamos National Laboratory Hazardous Waste Permit. On November 1, 2018, Triad National Security, LLC, (Triad) replaced LANS as co-operator and Permittee, henceforth, DOE, N3B, and Triad are collectively referred to as the Permittees.

The Permittees have submitted this Modification as an administrative or informational change as specified in the 40 Code of Federal Regulations (CFR) 270.42 Appendix I, item A.1. The Permittees are proposing to modify the waste stream descriptions list in the Waste Analysis Plan,

Attachment C of the Permit, to include descriptions for nitrate salt-bearing waste which was also treated by stabilization processes as described in Permit Part 7.

NMED has reviewed the Modification and has determined that the changes are not purely informational in nature, and since the changes allow for the storage of different wastes not previously stored at the unit. NMED has determined that the Modification is consistent with 40 CFR 270.42 Appendix I, item F.4.b (storage of different wastes in containers) and is therefore a Class 1 Permit Modification Request (PMR) with prior approval. NMED discussed this with the Permittees on October 3, 2018, and the Permittees agreed that is was more appropriate to categorize this Modification as a Class I PMR requiring prior approval.

NMED approves this Modification, and has incorporated the requested changes into Permit Attachment C. In addition to the changes requested, NMED has made minor typographical changes to Table C-4, please see Attachment 1 for more information.

An electronic version of the Permit that incorporates the modifications is enclosed with this letter. The modified Permit is also available on the NMED's Hazardous Waste Bureau website at: https://www.env.nm.gov/hazardous-waste/lanl-permit/

The New Mexico Hazardous Waste Management Regulation at 20.4.1.901 A (10) NMAC states "A final permit decision shall become effective thirty (30) days after the notice of the decision has been served on the applicant…" NMED approves this Permit modification on January 15, 2019; hence, the effective date of the modification shall be on February 14, 2019.

If you have any questions regarding this letter, please contact Siona Briley at (505) 476-6049.

Sincerely,

John E. Kieling
Chief
Hazardous Waste Bureau

Attachments:
1) Table 1
2) CD Attachment

cc w/o attachments:
N. Dhawan, NMED HWB
S. Briley, NMED HWB
M. Schatz, NMED HWB

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L. King, US EPA Region 6
F. Lockhart, N3B
K. Armijo, NA-LA
A. Duran, EM-LA
P. Padilla, EPC-WMP
P. Carson, EPC-WMP
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rcra-prr@lanl.gov

File: 2019 LANL Permit: Approval with Modification: Class 1* PMR
LANL-18-050

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Attachment 1: Table 1, NMED Modifications to the Class 1* Permit Modification

Location	Permittees' Text	NMED Modified Text in red	Rationale
Table C-4, page 46	[blank]	NA[d]	Added Not Applicable (NA) to clarify why no codes are listed for this waste stream.
Table C-4, page 47	[a] RSWD = Radioactive Solid Waste Disposal [codes] ~~RSWD code usage was discontinued prior to 2010.~~ [b] IDC = Item Description Code ~~IDC usage was discontinued prior to 2010.~~ [c] TRUCON = TRUPACT-II Content [codes]	[d] NA = Not Applicable, RSWD code and IDC usage was discontinued in 2010	Provided explanation for NA, and combined rationale for not providing codes into one statement.

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From:	Martinez, Cynthia, NMENV
To:	steve.goodrum@nnsa.doe.gov; Torres, Enrique
Cc:	Kieling, John, NMENV; Dhawan, Neelam, NMENV; Briley, Siona, NMENV; Schatz, Mitchell, NMENV; "king.laurie@epa.gov"; frazer.lockhart@em-la.doe.gov; karen.armijo@nnsa.doe.gov; aduran@doeal.gov; Padilla, Patrick L; Carson, Peter H; locatesteam; rcra-prr@lanl.gov
Subject:	Letter to Mr. Goodrum and Mr. Torres
Date:	Tuesday, January 15, 2019 1:03:55 PM
Attachments:	LANL 2019- Permit Approval with Modification Class 1 PMR LANL-18-050.pdf

Good Afternoon,
Please see attachment.

Cynthia Martinez
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg.1
Santa Fe, New Mexico 87505
Phone 505-476-6000

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