



U.S. DEPARTMENT OF  
**ENERGY**

ESHID-603862

**National Nuclear Security Administration**

Los Alamos Field Office  
3747 West Jemez Road, A316  
Los Alamos, New Mexico 87544  
(505) 667-5105/Fax (505) 667-5948

**Environmental Management**

Los Alamos Field Office  
1200 Trinity Drive, Suite 400P  
Los Alamos, New Mexico 87544  
(240) 562-1122

November 26, 2024

Mr. JohnDavid Nance, Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6313

**Subject: Fiscal Year 2024 Reporting of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit**

Dear Mr. Nance:

The United States Department of Energy (DOE) and its field offices, the National Nuclear Security Administration-Los Alamos Field Office (NA-LA) and the Environmental Management-Los Alamos Field Office (EM-LA), along with Triad National Security, LLC (Triad) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B), collectively the Permittees, submit the enclosed report, *Fiscal Year 2024 Reporting of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit* (Report) to the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB).

The Report is required by the Los Alamos National Laboratory Hazardous Waste Facility Permit (Permit) Section 1.9.13, *Written Reporting of a Non-threatening Release* and Permit Section 1.9.14, *Other Noncompliance*, and includes information for the Los Alamos National Laboratory (EPA ID #NM0890010515). The Permit requires the Permittees to report all instances of noncompliance with the Permit and to report any releases (at or from permitted units) that did not pose a threat to human health or the environment. The Permit requires that the Report be submitted annually by December 1 for the fiscal year ending September 30.

Enclosure 1 addresses instances of noncompliance with the Permit and releases at permitted units under operational control of NA-LA/Triad. Enclosure 2 addresses instances of noncompliance with the Permit and releases at permitted units under operational control of EM-LA/N3B. Each enclosure includes a certification page from the responsible Permittees.

If you have questions or comments for Triad concerning this submittal, please contact Robert A. Gallegos (NA-LA) at (505) 901-3824 or by email [robert.gallegos@nnsa.doe.gov](mailto:robert.gallegos@nnsa.doe.gov), or Jason Hill (Triad) at (505) 551-2218 or by email at [jshill@lanl.gov](mailto:jshill@lanl.gov).

If you have questions or comments for N3B concerning this submittal, please contact Arturo Duran (EM-LA) at (575) 373-5966 or by email at [arturo.duran@em.doe.gov](mailto:arturo.duran@em.doe.gov), or Christian Maupin (N3B) at (505) 695-4281 or by email at [christian.maupin@em-la.doe.gov](mailto:christian.maupin@em-la.doe.gov).

Sincerely,

**ROBERT  
GALLEGOS**

Digitally signed by ROBERT  
GALLEGOS  
Date: 2024.11.20 10:55:54  
-07'00'

Robert A. Gallegos  
Environmental Permitting and Compliance Program  
Manager  
National Nuclear Security Administration  
Los Alamos Field Office  
U.S. Department of Energy

Sincerely,



Digitally signed by Brian G.  
Harcek  
Date: 2024.11.25 10:10:59  
-07'00'

Brian G. Harcek, Director  
Office of Quality and Regulatory Compliance  
Environmental Management  
Los Alamos Field Office  
U.S. Department of Energy

- Enclosures: 1) Fiscal Year 2024 Reporting of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit U.S. Department of Energy, National Nuclear Security Administration-Los Alamos Field Office, and Triad National Security, LLC
- 2) Fiscal Year 2024 Reporting of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit U.S. Department of Energy, Environmental Management-Los Alamos Field Office, and Newport News Nuclear BWXT-Los Alamos, LLC

copy w/enclosures:

Laurie King, USEPA/Region 6, Dallas, TX, [king.laurie@epa.gov](mailto:king.laurie@epa.gov)  
Rick Shean, NMED, Santa Fe, NM, [rick.shean@env.nm.gov](mailto:rick.shean@env.nm.gov)  
JohnDavid Nance, NMED-HWB, Santa Fe, NM, [jd.nance@env.nm.gov](mailto:jd.nance@env.nm.gov)  
Neelam Dhawan, NMED-HWB, Santa Fe, NM, [neelam.dhawan@env.nm.gov](mailto:neelam.dhawan@env.nm.gov)  
Siona Briley, NMED-HWB, Santa Fe, NM, [siona.briley@env.nm.gov](mailto:siona.briley@env.nm.gov)  
Theodore A. Wyka, NA-LA, [theodore.wyka@nnsa.doe.gov](mailto:theodore.wyka@nnsa.doe.gov)  
Stephen Hoffman, NA-LA, [stephen.hoffman@nnsa.doe.gov](mailto:stephen.hoffman@nnsa.doe.gov)  
Jason Saenz, NA-LA, [jason.saenz@nnsa.doe.gov](mailto:jason.saenz@nnsa.doe.gov)  
Karen E. Armijo, NA-LA, [karen.armijo@nnsa.doe.gov](mailto:karen.armijo@nnsa.doe.gov)  
Robert A. Gallegos, NA-LA, [robert.gallegos@nnsa.doe.gov](mailto:robert.gallegos@nnsa.doe.gov)  
M. Lee Bishop, NA-LA, [lee.bishop@nnsa.doe.gov](mailto:lee.bishop@nnsa.doe.gov)  
Jessica M. Kunkle, EM-LA, [jessica.kunkle@em.doe.gov](mailto:jessica.kunkle@em.doe.gov)  
Brian G. Harcek, EM-LA, [brian.harcek@em.doe.gov](mailto:brian.harcek@em.doe.gov)  
Arturo Duran, EM-LA, [arturo.duran@em.doe.gov](mailto:arturo.duran@em.doe.gov)  
Cheryl Rodriguez, EM-LA, [cheryl.rodriguez@em.doe.gov](mailto:cheryl.rodriguez@em.doe.gov)  
Steven Coleman, Triad, ALDESHQ, [scoleman@lanl.gov](mailto:scoleman@lanl.gov)  
Jennifer Payne, Triad, ALDESHQ, [jpayne@lanl.gov](mailto:jpayne@lanl.gov)  
Jeannette T. Hyatt, Triad, EWP, [jhyatt@lanl.gov](mailto:jhyatt@lanl.gov)  
Steven L. Story, Triad, EPC-DO, [story@lanl.gov](mailto:story@lanl.gov)  
Francesca Trujillo, Triad, EC-DO, [francesca@lanl.gov](mailto:francesca@lanl.gov)  
Jessica L. Moseley, Triad, EPC-WMP, [jmoseley@lanl.gov](mailto:jmoseley@lanl.gov)  
Cecilia Trujillo, Triad, EPC-WMP, [ceciliat@lanl.gov](mailto:ceciliat@lanl.gov)  
Jason S. Hill, Triad, EPC-WMP, [jshill@lanl.gov](mailto:jshill@lanl.gov)  
Catherine Juarez, Triad, EPC-WMP, [cjuarez@lanl.gov](mailto:cjuarez@lanl.gov)  
Kristen Van Horn, Triad, EPC-WMP, [klv@lanl.gov](mailto:klv@lanl.gov)

Bradley Smith, N3B, [bradley.smith@em-la.doe.gov](mailto:bradley.smith@em-la.doe.gov)  
Christian Maupin, N3B, [christian.maupin@em-la.doe.gov](mailto:christian.maupin@em-la.doe.gov)  
Jennifer Von Rohr, N3B, [jennifer.vonrohr@em-la.doe.gov](mailto:jennifer.vonrohr@em-la.doe.gov)  
William Alexander, N3B, [william.alexander@em-la.doe.gov](mailto:william.alexander@em-la.doe.gov)  
Joshua Torres, N3B, [Joshua.torres@em-la.doe.gov](mailto:Joshua.torres@em-la.doe.gov)  
[rcra-prr@lanl.gov](mailto:rcra-prr@lanl.gov)  
[eshq-dcrm@lanl.gov](mailto:eshq-dcrm@lanl.gov)  
[locatesteam@lanl.gov](mailto:locatesteam@lanl.gov)  
[epccorrespondence@lanl.gov](mailto:epccorrespondence@lanl.gov)  
[lasomailbox@nnsa.doe.gov](mailto:lasomailbox@nnsa.doe.gov)  
[n3brecords@em-la.doe.gov](mailto:n3brecords@em-la.doe.gov)  
[emla.docs@em.doe.gov](mailto:emla.docs@em.doe.gov)  
[interface@lanl.gov](mailto:interface@lanl.gov)  
[N3Binterface@em-la.doe.gov](mailto:N3Binterface@em-la.doe.gov)

**COPY**



**U.S. DEPARTMENT OF  
ENERGY**

Received

NOV 26 2024

NMED Hazardous Waste Bureau

**National Nuclear Security Administration**

Los Alamos Field Office  
3747 West Jemez Road, A316  
Los Alamos, New Mexico 87544  
(505) 667-5105/Fax (505) 667-5948

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Dear Mr. Nance:

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# ENCLOSURE 1

## **Fiscal Year 2024 Reporting of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit**

*Date: November 26, 2024*

U.S. Department of Energy,  
National Nuclear Security Administration-Los Alamos Field Office, and  
Triad National Security, LLC



**Fiscal Year 2024 Reporting of Releases and Instances of Noncompliance  
with the Los Alamos National Laboratory Hazardous Waste Facility  
Permit U.S. Department of Energy, National Nuclear Security  
Administration-Los Alamos Field Office, and Triad National Security, LLC**

**CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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.

**STEVEN STORY**  
(Affiliate)

Digitally signed by STEVEN  
STORY (Affiliate)  
Date: 2024.11.08 08:36:26  
-07'00'

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**Steven L. Story**  
Division Leader  
Environmental Protection and Compliance Division  
Triad National Security, LLC  
Los Alamos National Laboratory

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Date Signed

**ROBERT  
GALLEGOS**

Digitally signed by ROBERT  
GALLEGOS  
Date: 2024.11.20 10:56:19 -07'00'

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**Robert A. Gallegos**  
Permitting and Compliance Program Manager  
National Nuclear Security Administration  
Los Alamos Field Office  
U.S. Department of Energy

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Date Signed

Fiscal Year 2024 Reporting of Releases and Instances of Noncompliance with the  
Los Alamos National Laboratory Hazardous Waste Facility Permit  
U.S. Department of Energy, National Nuclear Security Administration-Los Alamos Field Office  
and Triad National Security, LLC

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## Introduction

This annual report has been prepared by the U.S. Department of Energy (DOE), National Nuclear Security Administration-Los Alamos Field Office (NA-LA), and Triad National Security, LLC (Triad), to meet a reporting requirement of the Los Alamos National Laboratory (LANL or the Laboratory) Hazardous Waste Facility Permit (the Permit). Permit Sections 1.9.13 and 1.9.14 require reporting of: (1) any non-threatening release of hazardous waste or constituents from or at a permitted unit and (2) all instances of noncompliance with the Permit. Accordingly, this report must be submitted to the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) annually, by December 1, for the previous year ending September 30. This report covers the reporting period October 1, 2023, through September 30, 2024.

Please note that this enclosure addresses only releases and instances of noncompliance at permitted units under operational control of Triad. None of the identified releases or incidents 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:

Triad 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 period, there were four (4) instances of release within or from a permitted unit under operational control of Triad. Regarding the term “release” as used in this report, the Permit defines a release as “any accidental or intentional spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, or dumping of any hazardous waste or hazardous constituents inside a permitted unit or from a permitted unit to the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous waste or hazardous constituents.”

None of the releases or spills from or at an indoor permitted unit resulted in migration outside of the building and none threatened human health or the environment. The spill at the outdoor unit did not migrate or threaten human health or the environment or impact any Solid Waste Management Units (SWMUs), Areas of Concerns (AOCs), or water courses near the unit.

#### **TA-54 West, Mixed Waste Storage Area**

On December 8, 2023, during the changing of hydraulic fluid on a scissor lift located on the Permitted outdoor pad, approximately 300 milliliters (ml) of hydraulic fluid was spilled. The asphalt was cleaned and micro-blazed. Maintenance operators were instructed to take greater care to prevent overfilling of equipment reservoirs in the future.

The release at this permitted unit was not a risk to the public, human health, or the environment. There was no impact to SWMUs, AOCs, or water courses near the unit.

#### **TA-55-4, Mixed Waste Storage Tank System**

On March 7, 2024, a release from a safety shower in an adjacent room to the unit, sent approximately 10 gallons water into the unit. The safety shower was unintentionally activated. The water did not impact any waste drums or reach any floor drains. Samples of the water were taken and no detectable activity was found. The water was cleaned up on March 8, 2024.

The release into this permitted unit was not a risk to the public, human health, or the environment. The release occurred within an indoor location with no potential for migration to the outside; therefore, there was no impact to SWMUs, AOCs, or water courses near the building.

#### **TA-55, B45**

On March 20, 2024 approximately 3 liters of water was discovered on the floor of the permitted unit during inspection. It was determined that during the night, a valve in a room above the unit was not closed completely and water dripped from the ceiling down into the unit. No waste drums were impacted and no detectable activity was found after samples of the water were taken. The water was cleaned up on March 20, 2024.

The release into this permitted unit was not a risk to the public, human health, or the environment. The release occurred within an indoor location with no potential for migration to the outside; therefore, there was no impact to SWMUs, AOCs, or water courses near the building.

#### **TA-63, Mixed Waste Storage Area**

On August 6, 2024, personnel were preparing to repair the conveyor belt equipment in the High Efficiency Neutron Counter (HENC) unit (63-0157) and spilled a gear oil on the concrete under the trailer. The release was approximately 40 ml and it was micro-blazed and cleaned up upon discovery.



Fiscal Year 2024 Reporting of Releases and Instances of Noncompliance with the  
Los Alamos National Laboratory Hazardous Waste Facility Permit  
U.S. Department of Energy, National Nuclear Security Administration-Los Alamos Field Office  
and Triad National Security, LLC

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The operators were trained to use absorbents under potential leak sites when conducting maintenance.

The release at this permitted unit was not a risk to the public, human health, or the environment. The release occurred within an indoor location with no potential for migration to the outside; therefore, there was no impact to SWMUs, AOCs, or water courses near the building.

### **Instances of Noncompliance with the Permit**

From October 1, 2023, through September 30, 2024, Triad documented a total of twenty-four (24) instances of noncompliance with the Permit. These occurrences are provided in Enclosure 1, Table 1. The instances of noncompliance are organized by unit location.

### **Summary of Corrective Actions**

As part of the LANL commitment to environment, health, and safety (EHS), excellence, and continuous improvement, the Permittees are dedicated to ongoing efforts to evaluate, refine, and optimize pollution prevention, waste minimization, and environmental management systems, processes, and tools to ensure compliance with the Permit. Facility operators, EHS subject matter experts, and waste management personnel continue to identify and implement corrective actions and communicate lessons learned, such as a feedback process to confirm that weekly inspections have been conducted, as a best management practice to ensure compliance.

**Table 1. Fiscal Year 2024 Noncompliance Report  
NA-LA/Triad**

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Number of Instances	Period of Noncompliance	Steps Taken to Resolve
3/11/24	TA-55-4, B40	<p>Treatment, storage, and facility personnel were unable to conduct the required daily hazardous waste inspections because the area was being evaluated by radiological control technicians.</p> <p>This is a noncompliance of Permit Section 2.6.1.</p>	Not applicable	1	3/11/24 – 3/17/24	The missed inspection was recorded in the Operating Record.
3/19/2024	TA-60-17	<p>The current Contingency Plan was not present at the unit.</p> <p>This is a noncompliance with Permit Section 2.11.3.</p>	Not applicable	1	3/19/2024 – 3/19/2024	The current Contingency Plan was placed at the unit.
3/19/2024	TA-60-17	<p>A container had inconsistent Environmental Protection Agency (EPA) Hazardous Waste Numbers on the label when compared to the Operating Record.</p> <p>This is a noncompliance of Permit Section 3.6(1).</p>	1 Container	1	3/19/2024 – 3/19/2024	The appropriate EPA Hazardous Waste Numbers were added to the container label to match the Operating Record.
3/19/2024	TA-60-17	<p>A container had an inconsistent accumulation start date on the label when compared to the Operating Record.</p> <p>This is a noncompliance of Permit Section 2.12.2(1).</p>	1 Container	1	3/19/2024 – 3/19/2024	The accumulation start date on the container was corrected in the Operating Record.

**Table 1. Fiscal Year 2024 Noncompliance Report  
NA-LA/Triad**

<b>Date of Discovery</b>	<b>Permitted Unit Location</b>	<b>Noncompliance</b>	<b>Quantity of Material</b>	<b>Number of Instances</b>	<b>Period of Noncompliance</b>	<b>Steps Taken to Resolve</b>
3/19/2024	TA-60-17	Containers were physically present in the unit, but they were not found in the printed Operating Record inventory. This is noncompliance of Permit Section 2.12.2(2).	2 Containers	1	3/19/2024 – 3/20/2024	The containers were verified to be in the Operating Record.
3/19/2024	TA-60-17	Four containers were missing the hazard indicator label. This is noncompliance of Permit Section 3.6(1).	4 Containers	1	3/19/2024 – 3/19/2024	The appropriate hazard indicator was added to each container label.
3/19/2024	TA-60-17	Two containers had inconsistent accumulation start dates on the label prior to the Operating Record of when the unit became active on December 13, 2023. This is a noncompliance of Permit Sections 2.12.2(1) and 3.6(1).	2 Containers	2	3/19/2024 – 3/19/2024	The accumulation start dates were corrected on the containers.
3/19/2024	TA-60-17	Three first aid kits were present at the unit but were not easily identifiable to someone not familiar with the site. The Contingency Plan requires that a first aid kit is available. This is a noncompliance of Permit Section 2.10.2.	Not applicable	1		The first aid kits were labeled and placed in easily identifiable locations to ensure they are readily available to use when needed.
05/21/2024	TA-55-4-G12	The Contingency Plan was not present at the unit. This is a noncompliance with Permit Section 2.11.3(1)	Not applicable	1	05/21/2024 – 5/21/2024	The current Contingency Plan was placed at the unit.
05/21/2024	TA-55-4, B40	Aisle spacing between containers in the unit was obstructed. This is a noncompliance with Permit Section 3.5.1(1).	Not applicable	1	05/21/2024 – 5/30/2024	The obstruction was removed to meet the aisle spacing requirement.

**Table 1. Fiscal Year 2024 Noncompliance Report  
NA-LA/Triad**

<b>Date of Discovery</b>	<b>Permitted Unit Location</b>	<b>Noncompliance</b>	<b>Quantity of Material</b>	<b>Number of Instances</b>	<b>Period of Noncompliance</b>	<b>Steps Taken to Resolve</b>
05/21/2024	TA-55-4, B05	Aisle spacing between containers in the unit was obstructed. This is a noncompliance with Permit Section 3.5.1(1).	Not applicable	1	05/21/2024 – 05/22/2024	The containers were moved to meet the aisle spacing requirement.
8/14/2024	TA-55-0355 Pad	A hazardous waste label was missing EPA Hazardous Waste Numbers on the label when compared to the Operating Record. This is a noncompliance of Permit Section 3.6(1).	1 Container	1	8/14/2024 – 8/14/2024	On 8/14/2024, new labels with EPA Hazardous Waste Numbers were printed and the corrected label was placed on the container after the old label was removed.
8/14/2024	TA-55-0355 Pad TA-55-4 Outdoor Storage Pad	The Inspection Record Forms (IRF) completed at the unit were marked as “OK”, but should have been marked as “AR”. This is a noncompliance of Permit Section 2.6.3.	Not applicable	2	8/1/2024 – 8/15/2024 8/1/2024 – 8/15/2024	The IRFs were corrected to reflect the inconsistency.
8/14/2024	TA-55-4 Outdoor Storage Pad	Five containers had EPA Hazardous Waste Numbers on the label that were inconsistent with the Operating Record. This is a noncompliance with Permit Section 3.6(1).	5 Containers	1	8/14/2024 – 8/14/2024	New labels were printed with the correct EPA Hazardous Waste Numbers.
8/14/2024	TA-55-0355 Pad	A container had an inconsistent accumulation start date on the label compared to the Operating Record. This is a noncompliance of Permit Section 2.12.2(1).	1 Container	1	8/14/2024 – 8/14/2024	A new label with the correct start date was placed on the container.

**Table 1. Fiscal Year 2024 Noncompliance Report  
NA-LA/Triad**

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Number of Instances	Period of Noncompliance	Steps Taken to Resolve
10/18/2024	Not applicable	One document from the New Mexico Environment Department-Hazardous Waste Bureau to the Permittees was not placed in the Los Alamos National Laboratory (LANL) Electronic and Hard Copy Public Reading Rooms until after the 10 days required by Permit Section 1.10. This is a noncompliance of Permit Section 1.10.	Not applicable	1	2/24/2024 – 3/1/2024	When the oversight was recognized, correspondence was placed in the LANL Public Reading Rooms. In this instance, there was a limited distribution list on the letter; therefore, internal distribution was not fully completed. Efforts to remind personnel of the available communication avenues for all incoming correspondence are regularly restated and the Permittees will continue to work to ensure that correspondence is received by the correct personnel in a timely manner.
11/07/2023	TA-03-29	Two containers with replacement all-in-one hazardous waste labels covering older hazardous waste labels included accumulation start dates that were inconsistent with the Operating Record. The hazard indicator label on the older label was also covered by the newer all in one label. This is a noncompliance with Permit Section 3.6(1).	2 Containers	2	11/07/2023 – 11/09/2023	Personnel were instructed not to change the accumulation start date on the hazardous waste label when a new all in one label is created. New labels were printed with the correct accumulation start date. Personnel were also instructed on placement of labels and not cover the hazard indicator on the container as well as to place the hazard indicator in a visible location for inspection.
11/13/2023 12/13/2023 04/29/2024	TA-3-29 TA-55 TA-63 TA-55-4, B05 TA-55-4, B05	Treatment, storage, and facility personnel had expired on their Resource Conservation and Recovery Act (RCRA) Refresher training. This is a noncompliance of Permit Section 2.7.	Not applicable	3	11/10/2023 – 11/13/2023 12/8/2023 – 12/19/2023 04/24/2024 – 5/30/2024	Personnel completed the required training.
11/30/2023	TA-63 Transuranic Waste Facility	A treatment, storage, and facility personnel had expired on their RCRA Refresher training. This is a noncompliance of Permit Section 2.7.	Not applicable	1	11/30/2023 – 2/21/2024	Personnel completed the required training.

# ENCLOSURE 2

## **Fiscal Year 2024 Reporting of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit**

*Date:* October 31, 2024

U.S. Department of Energy,  
Environmental Management Los Alamos Field Office, and  
Newport New Nuclear BWXT-Los Alamos, LLC

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November 2024  
EM2024-0759

# **Fiscal Year 2024 Reporting of Noncompliance and Releases for Newport News Nuclear BWXT-Los Alamos, LLC**

**Los Alamos National Laboratory  
Hazardous Waste Facility Permit**



Newport News Nuclear BWXT-Los Alamos, LLC (N3B), under the U.S. Department of Energy Office of Environmental Management Contract No. 89303318CEM000007 (the Los Alamos Legacy Cleanup Contract), has prepared this document. The public may copy and use this document without charge, provided that this notice and any statement of authorship are reproduced on all copies.



**CERTIFICATION**

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

**Fiscal Year 2024 Reporting of Noncompliance and Releases for  
Newport News Nuclear BWXT-Los Alamos, LLC**

**C E R T I F I C A T I O N   S T A T E M E N T   O F   A U T H O R I Z A T I O N**

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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."



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October 24, 2024

Robert Edwards III, Program Manager  
Environment, Safety, Health and Quality  
Newport News Nuclear BWXT-Los Alamos, LLC

Date



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G. Harcek  
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Brian Harcek, Director  
Office of Quality and Regulatory Compliance  
U.S. Department of Energy  
Environmental Management  
Los Alamos Field Office

Date

## 1.0 INTRODUCTION

This report has been prepared by the U.S. Department of Energy (DOE) Environmental Management Los Alamos Field Office (EM-LA) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B), collectively the Permittees, to meet the reporting requirements of the Los Alamos National Laboratory Hazardous Waste Facility Permit (Permit). Permit Sections 1.9.13 and 1.9.14 require reporting any non-threatening releases of hazardous waste or constituents from, or at, a permitted unit, and all instances of noncompliance with the Permit. This report must be submitted to the New Mexico Environment Department (NMED), Hazardous Waste Bureau by December 1 of each year.

This report addresses EM-LA/N3B releases and instances of noncompliance from October 1, 2023, through September 30, 2024.

- There were two incidents involving spills of wastes or products, neither of which resulted in a release of hazardous waste or constituents from permitted areas.
- None of the instances of Permit noncompliance detailed in this report posed a potential threat to human health or the environment.

## 2.0 FACILITY INFORMATION

### **Owner and Operator:**

United States Department of Energy  
Environmental Management Los Alamos Field Office  
1200 Trinity Drive, Suite 400  
Los Alamos, NM 87544  
(505) 562-1122

### **Co-Operator:**

Newport News Nuclear BWXT-Los Alamos, LLC  
1200 Trinity Drive, Suite 150  
Los Alamos, NM 87544  
(505) 257-7690

### **Facility:**

Technical Area 54  
Los Alamos National Laboratory  
Mesita del Buey Road  
Los Alamos, NM 87545  
(505) 257-8400

### **3.0 RELEASES FROM OR WITHIN A PERMITTED UNIT**

During the period of October 1, 2023, through September 30, 2024, there were two releases within a permitted unit under EM-LA/N3B management. One occurred on May 14, 2024, at the Dome 375 Permacon, the second occurred at Area L on August 14, 2024. As detailed in Table 1, both instances were limited in nature, resulting in no release of hazardous material or waste from the site. Neither incident required activation of the Contingency Plan, and no issues of noncompliance were identified in conjunction with either incident.

### **4.0 INSTANCES OF PERMIT NONCOMPLIANCE**

From October 1, 2023, through September 30, 2024, two instances of Permit noncompliance were observed and documented. Included in Table 1 is a summary of each noncompliance. Note: Table 1 additionally includes information pertaining to nonthreatening releases from or at permitted units.

### **5.0 SUMMARY OF IMPROVEMENTS**

N3B is working to improve the identification of Permit noncompliance through ongoing training for all personnel involved with Permit implementation. In addition, waste management policies and procedures are continually reviewed and revised to reflect best management practices and actual working conditions to ensure Permit-compliant operations.

All the Resource Conservation and Recovery Act (RCRA) inspection personnel, Waste Management Coordinators, and personnel responsible for handling hazardous waste receive annual training on RCRA waste generator requirements. Regulatory Compliance personnel provide internal oversight of waste operations and implement regulatory requirements into policies, plans and procedure to identify Permit-specific requirements. To facilitate better communication and to provide separation between inspectors and waste generators and handlers, N3B reorganized personnel so that RCRA inspectors report directly to the N3B Regulatory Compliance Director.

Physical improvements, which have recently been initiated, include the removal and replacement of the southern perimeter berm of Dome 153. Reconstruction of the berm is currently underway.

As a result of NMED's concerns regarding the management of containers with exterior rust, expressed during their November 2022 inspection, N3B continues to evaluate the inspection requirements for containers that exhibit exterior rust or potential defects. The process requires detailed inspections to be performed on suspect containers, with continued detailed inspections being performed on areas of concern on suspect containers.

**Table 1**  
**Fiscal Year 2024 Noncompliance Report for N3B**

Date of Discovery	TA <sup>a</sup> -54 Permitted Unit Location	Permit Section, CFR <sup>b</sup> or another Reference	Noncompliance or Incident Description	Days Out of Compliance	Corrective Actions Taken/Additional Information
8/18/2022	TA-54 Dome 153	Permit Condition 3.12.2.1	Despite multiple efforts to repair the perimeter berm, stormwater run-on infiltrated the southern berm of Dome 153 and migrated to areas of Permitted waste storage.	Ongoing and pending completion of berm replacement	As detailed previously to NMED, multiple exhaustive repairs, short of removal and replacement of the affected berm, were attempted without success since the issue was first identified in 2022. Currently, all waste has been removed from the impacted area, and reconstruction of the southern berm is underway.
4/23/2024	TA-54 Dome 375	Permit Condition 1.9.12	The occurrence of sparks and smoke from a gantry crane during CMP <sup>c</sup> size reduction operations prompted notifications to NMED in accordance with Permit Condition 1.9.12.	0	As detailed in N3B's initial 24-hr and 5-day written reports submitted to NMED on April 23, 2024, and April 29, 2024, respectively, in response to this incident, corrective actions included the response of the LAFD <sup>d</sup> , which determined there was no active fire. Necessary repairs were made, and operations resumed on April 25, 2024. There was no spill or release of hazardous materials or waste associated with this incident, and no spill response activities were necessary or conducted. No issues of noncompliance were identified as a result of this incident.
5/7/2024	TA-54 Dome 375	Permit Condition 1.9.12	The discovery of a propane-like odor in the Permacon during CMP size reduction operations prompted notifications to NMED in accordance with Permit Condition 1.9.12.	0	As detailed in N3B's initial 24-hr and 5-day written reports submitted on May 8, 2024, and May 13, 2024, respectively, in response to this incident, corrective actions included the response of the LAFD, which determined there was no longer any indication of propane or other gases. Three individuals who reported symptoms of nausea and dizziness were evaluated by LAFD, determined to have normal vital signs, and released to go back to work. N3B performed confirmatory gas monitoring in the area and verified the absence of hazardous gases. Because this incident occurred within the Permacon, there was no potential for release of hazardous waste or constituents. No issues of noncompliance were identified as a result of this incident.
5/14/2024	TA-54 Dome 375	Permit Conditions 7.4(1) and 1.9.13	During the size reduction process, an IP <sup>e</sup> -1 bag containing an in-process CMP (RCRA waste codes D004, D005, D006, D007, D008, D009, D010, D011, F001, F002, F005) released material to the area under the loading dock conveyor for Dome 375 Permacon.	0	While a CMP was being winched into the Dome 375 Permacon for size reduction and packaging for off-site disposal, the CMP end cap broke within the IP-1 bag. The break caused a fragmented section to get caught in the conveyor roller system, which in turn breached the IP-1 bag causing a release to the area under the loading dock conveyor. Cleanup of the released material was immediately completed, and no contamination was identified outside of the immediate work area. Additional information to satisfy the reporting requirements of Permit condition 1.9.13 is provided in Attachment 1 of this submittal.
8/14/2024	TA-54 Area L	Permit Condition 1.9.13	An estimated 0.5 gal. of an herbicide product was spilled on the asphalt surface. No migration of the spilled material occurred from the immediate vicinity of the permitted unit. There was no discharge associated with this spill.	0	As detailed in N3B's Release/Discharge Notification Form submitted to NMED on August 15, 2024, cleanup of the spilled herbicide product was initiated immediately, with the use of limited application of water and active, manual scrubbing, and absorbent pads. The perimeter of the spill area was secured with absorbent socks to prevent movement of the spilled residue. No discharge occurred, and no issues of noncompliance were identified as a result of this incident.
12/4/2023	Pueblo Complex (N3B-160) Room 203	40 CFR 262.15(a)(5)(i)	During NMED's annual inspection in December 2023, several small containers of hazardous waste stored within a flammable cabinet were found to be improperly labelled.	1	Upon discovery, the hazardous waste was labelled appropriately.

<sup>a</sup> TA = Technical Area.

<sup>b</sup> CFR = Code of Federal Regulations.

<sup>c</sup> CMP = Corrugated metal pipe.

<sup>d</sup> LAFD = Los Alamos Fire Department.

<sup>e</sup> IP = Industrial package.

# **Attachment 1**

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*Summary of Non-Threatening Release*

In accordance with Condition 1.9.13 of the Los Alamos National Laboratory Hazardous Waste Permit, this summary has been prepared to report a non-threatening incident that occurred on May 14, 2024, at Technical Area 54 (TA-54), Area G, Pad 11, Dome 375.

(1) Name, address and telephone number of the owner and operator

Jessica Kunkle

1200 Trinity Drive, Suite 400

Los Alamos, NM 87544

(505)665-5658

(2) Name, address and telephone number of the Facility

U.S. Department of Energy

1200 Trinity Drive, Suite 400

Los Alamos, NM 87544

(505) 665-5658

(3) Date, time and type of incident

On May 14, 2024, at 1500 hours, the TA-54 Operations Center received notification that an Industrial Package 1 (IP-1) containing a corrugated metal pipe (CMP) had breached as it was being pulled with a winch from the 375 PermaCon loading dock into Cell 1 of the Permacon during size reduction operations. The CMP concrete end cap had broken off the CMP within the IP-1 bag, causing the IP-1 bag to tear on the loading dock conveyor. The IP-1 bag and its contents were pulled into Cell 1, and all personnel exited the dome, including individuals that were in the PermaCon. The Operations Center entered into N3B-AOP-TRU-3003, "Material Release or Spill." No contamination was identified during personnel surveys performed by N3B radiological control technicians (RCTs). At 1922 hours, the TA-54 Facility Operations Manager was notified that screening of the spill area identified radiation contamination on the rollers. Contamination was limited to the loading dock area around and under the rollers and associated roller frame within the work area. No contamination was identified outside of the defined work area of the loading dock. All personnel nasal swabs analyzed by Health Physics Analysis Laboratories (HPAL) indicated no detectable activity.

(4) Name and quantity of materials involved

One IP-1 bag containing 1 CMP was involved in this incident. Resource Conservation and Recovery Act (RCRA) codes D004, D005, D006, D007, D008, D009, D010, D011, F001, F002, and F005 are assigned to the CMP. Approximately 2 gal. of liquid (presumed to be precipitation) along with a small amount of solid debris was released to the ground surface of the loading dock when the IP-1 bag was torn open.

(5) The estimated quantity and disposition of recovered material that resulted from the incident

Materials used to absorb the precipitation were containerized and disposed of properly along with secondary waste generated by CMP size reduction operations. A small volume of solid debris, which became dislodged from the IP-1 bag, was packaged for disposal along with the size-reduced CMP for final disposal.