## ESHID-603884



Los Alamos National Laboratory P.O. Box 1663, MS M325 Los Alamos, NM 87545 505-667-4218



**National Nuclear Security Administration** 

Los Alamos Field Office 3747 West Jemez Road, A316 Los Alamos, NM 87544 505-667-5794/Fax 505-606-5948

> Date: April 4, 2025 LA-UR -25-21806

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

#### Subject: Notification of Planned Start of a Temporary Authorization Request Waste Management Activity, Los Alamos National Laboratory, Hazardous Waste Facility Permit, EPA ID# NM0890010515

Dear Mr. Nance:

The United States Department of Energy and its field offices, the National Nuclear Security Administration Los Alamos Field Office (NA-LA) and the Office of Environmental Management Los Alamos Field Office, in association with Triad National Security, LLC (Triad) and Newport News Nuclear BWXT-Los Alamos, LLC, collectively the Permittees, submit this letter to notify the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) of a planned start date for activities described in a Temporary Authorization Request to the Los Alamos National Laboratory, Hazardous Waste Facility Permit (the Permit).

In 2019, NA-LA and Triad prepared a request in accordance with Title 40 of the Code of Federal Regulations §270.42(e)(3) and submitted to the NMED-HWB June 18, 2019. A revised request, *Withdrawal and Resubmittal of a Temporary Authorization Request for Waste Treatment, Storage, and Repackaging, Los Alamos National Laboratory Hazardous Waste Facility Permit, EPA ID# NM0890010515*, was submitted March 9, 2020 (EPC-DO: 20-074, <a href="https://srorlgreen.lanl.gov/object/tr?what=info:lanl-repo/eprr/ESHID-603576">https://srorlgreen.lanl.gov/object/tr?what=info:lanl-repo/eprr/ESHID-603576</a>) to provide additional pressure mitigation activity locations and address comments received from the NMED-HWB. The operation was originally planned to commence in April 2020, but was delayed by the COVID-19 pandemic and the formal readiness and authorization process that is an important part of the program to ensure safe operations.

The Permittees now plan to start pressure mitigation activities in June 2025 and are seeking official temporary authorization approval from NMED for activities to begin on or shortly after June 2, 2025. Enclosed is a letter providing written confirmation from the United States Environmental Protection



Agency (EPA) that no further action is required prior to proceeding with startup for these activities pursuant to EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61, Subparts A and H, Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities. Concurrently, we are sending similar notifications to the EPA of this planned start date.

If you have questions or comments regarding this submittal, please contact Luciana Vigil-Holterman (Triad) at (505) 665-3435 or by email at luciana@lanl.gov or Robert Gallegos (NA-LA) at (208) 569-0377 or by email at robert.gallegos@nnsa.doe.gov.

Sincerely,

Digitally signed by JEANNETTE HYATT (Affiliate) **JEANNETTE** HYATT (Affiliate) Date: 2025.04.01 10:29:29

Jeannette Hyatt Senior Director **Environment and Waste Programs** Triad National Security, LLC

Sincerely,

ROBERT

Digitally signed by ROBERT GALLEGOS GALLEGOS Date: 2025.04.03

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

### JH/RAG/AMM

Enclosure: Status Update for the Flanged Tritium Waste Container Project at LANL TA-54

Copy: Laurie King, USEPA/Region 6, Dallas, TX, king.laurie@epa.gov Rick Shean, NMED-HWB, Santa Fe, NM, rick.shean@env.nm.gov JohnDavid Nance, NMED-HWB, Santa Fe, NM, jd.nance@env.nm.gov Neelam Dhawan, NMED-HWB, Santa Fe, NM, neelam.dhawan@env.nm.gov Siona Briley, NMED-HWB, Santa Fe, NM, siona.briley@env.nm.gov Theodore A. Wyka, NA-LA, theodore.wyka@nnsa.doe.gov Jason Saenz, NA-LA, jason.saenz@nnsa.doe.gov Karen E. Armijo, NA-LA, karen.armijo@nnsa.doe.gov Robert A. Gallegos, NA-LA, robert.gallegos@nnsa.doe.gov Wendy Bauer, NA-LA, wendy.bauer@nnsa.doe.gov Veronica Nieto, NA-LA, veronica.nieto@nnsa.doe.gov Kari Martinez, NA-LA, kari.martinez@nnsa.doe.gov Jessica M. Kunkle, EM-LA, jessica.kunkle@em.doe.gov Brian G. Harcek, EM-LA, brian.harcek@em.doe.gov Cheryl Rodriguez, EM-LA, cheryl.rodriguez@em.doe.gov Steven A. Coleman, Triad, ALDESHQ, scoleman@lanl.gov Jennifer E. Payne, Triad, ALDESHQ, jpayne@lanl.gov Jeannette T. Hyatt, Triad, EWP, jhyatt@lanl.gov Adrianna Greathouse, Triad, EWP, agreathouse@lanl.gov Steven L. Story, Triad, EPC-DO, story@lanl.gov Katherine Higgins, Triad, EPC-DO, kwurden@lanl.gov Francesca Trujillo, Triad, EPC-DO, francesca@lanl.gov Jessica L. Moseley, Triad, EPC-WMP, jmoseley@lanl.gov Jackie C. Hurtle, Triad, EPC-WMP, jhurtle@lanl.gov Luciana R. Vigil-Holterman, Triad, EPC-WMP, luciana@lanl.gov



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Environment, Safety, Health, & Quality

Los Alamos National Laboratory P.O. Box 1663, MS M325 Los Alamos, NM 87545 505-667-4218 Received

APR 4 2025

NMED Hazardous Waste Bureau



National Nuclear Security Administration Los Alamos Field Office 3747 West Jemez Road, A316 Los Alamos, NM 87544 505-667-5794/Fax 505-606-5948

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# **ENCLOSURE**

Status Update for the Flanged Tritium Waste Container Project at LANL TA-54

Date: April 4, 2025

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



March 18, 2025

Theodore A. Wyka Manager, Los Alamos Field Office National Nuclear Security Administration U.S. Department of Energy Los Alamos Field Office 3747 West Jemez Road – MS A316 Los Alamos, NM 87544

Re: Status Update for the Flanged Tritium Waste Container Project at LANL TA-54

Dear Mr. Wyka:

Thank you for your status update letter dated February 10, 2025, to the U.S. Environmental Protection Agency (EPA), informing EPA Region 6 of the U.S. Department of Energy's (DOE) intent to move forward with the Flanged Tritium Waste Containers (FTWC) remediation project at Los Alamos National Laboratory (LANL).

In letters dated September 25, 2018, May 22, 2019, and August 10, 2020, EPA informed DOE its application for construction for the FTWC project was approved pursuant to EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61, Subparts A and H, Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities. Pursuant to your request, this letter serves as written confirmation that no further action from EPA is required prior to proceeding with startup notifications.

We appreciate you and your staff meeting in person with Regional Administrator Scott Mason IV, EPA staff and me on March 6, 2025, to further discuss the project. We look forward to our continued partnership with the DOE on our common goals to support the mission of Los Alamos National Laboratory and protect public health. Should you have any questions concerning the substance of this letter you may contact Michael Feldman at (214) 665-9793, or George Brozowski at (214) 665-8541.

Sincerely,

JAMES Digitally signed by JAMES MCDONALD Date: 2025.03.18 09:35:26 -05'00'

James McDonald Director Air and Radiation Division