



Los Alamos National Laboratory  
P.O. Box 1663, MS K490  
Los Alamos, NM 87545  
505-667-0666

**Environmental Protection & Compliance Division**

**Symbol:** EPC-DO: 25-106

**LA-UR:** 25-23401

**Date:** April 3, 2025

Mr. George Brozowski  
Senior Regional Health Physicist/Radon Policy Advisor  
U.S. Environmental Protection Agency, Region 6  
1201 Elm Street, Suite 500  
Mail Stop 6ARSI  
Dallas, TX 75270-2102

**SUBJECT: Notification of Planned Start of a Radiological Air Emissions Point Source:  
Remediation of the Flanged Tritium Waste Containers (FTWCs) at TA-54**

Dear Mr. Brozowski:

This memo serves as a Notification of Planned Startup under 40 CFR 61.09(a)(1) for a new point source of radionuclide air emissions at Technical Area 54 at Los Alamos National Laboratory (LANL or the Laboratory). This operation will be the remediation of the four Flanged Tritium Waste Containers (FTWCs) at TA-54. This operation was originally planned to commence in April 2020 but was delayed by the COVID-19 pandemic. LANL then planned to commence operations in September 2020 but was delayed again due to unforeseen circumstances regarding the operational readiness assessment process and public outreach. LANL is going through the readiness process over the next several weeks. Remediation activities will begin on or shortly after June 2, 2025, upon conclusion of these readiness activities. 40 CFR 61.09 states:

61.09 Notification of Startup.

- (a) The owner or operator of each stationary source ... shall furnish the Administrator with written notification as follows:
  - (1) A notification of the anticipated date of initial startup of the source not more than 60 days nor less than 30 days before that date.
  - (2) A notification of the actual date of initial startup of the source within 15 days after that date.

As required in 61.09(a)(2), we will be notifying you of the **actual** start date of radiological operations shortly after operations commence.

Concurrently, we are sending similar communications to the New Mexico Environment Department, requesting formal consideration from that organization for the Temporary

Authorization for the aspects of the FTWC remediation operations addressing Resource Conservation and Recovery Act (RCRA) requirements.

The FTWC remediation activities were described in detail in our Application for Pre-construction Approval dated May 17, 2019. We received EPA approval of the pre-construction application on May 22, 2019. A change in scope of planned operations, reflecting the potential for venting at multiple LANL locations, was sent to EPA on March 5, 2020. Approval for this modified scope was received from EPA on August 10, 2020. Since then, we have had additional communications addressing questions raised by Region 6. On March 18, 2025, EPA Region 6 confirmed that no further action is needed prior to proceeding with normal startup notifications.

The source will be continuously monitored for emissions of tritium. Additionally, an emissions management plan has been established for this source to ensure regulatory and administrative limits are not exceeded. Stack flow characterization testing was successfully conducted on a scale model of the venting system in 2019 as part of the stack design process. Validation tests (flow velocity and cyclonic flow measurements) were successfully completed in October 2019. Documentation of the stack and sample system is maintained on-site for your review.

If you have questions or comments, please contact David Fuehne of my staff. David can be reached by email at [davef@lanl.gov](mailto:davef@lanl.gov) or by phone at (505) 699-5619.

Sincerely,

SARAH HOLCOMB  Digitally signed by SARAH  
HOLCOMB (Affiliate)  
Date: 2025.04.03 11:37:02 -06'00'

Sarah S. Holcomb  
Group Leader  
Environmental Protection and Compliance  
Compliance Programs  
Triad National Security, LLC

SSH/DPF/RRL/mmh

Copy: George P. Brozowski, USEPA Region 6, [brozowski.george@epa.gov](mailto:brozowski.george@epa.gov)  
Theodore A. Wyka, NA-LA, [theodore.wyka@nnsa.doe.gov](mailto:theodore.wyka@nnsa.doe.gov)  
Anna Marie Trujillo, NA-LA, [anna.trujillo@nnsa.doe.gov](mailto:anna.trujillo@nnsa.doe.gov)  
Jason P. Saenz, NA-LA, [jason.saenz@nnsa.doe.gov](mailto:jason.saenz@nnsa.doe.gov)  
Stephanie T. Stringer, NA-LA, [stephanie.stringer@nnsa.doe.gov](mailto:stephanie.stringer@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)  
Margeau Valteau, NA-EA-30, [margeau.valteau@nnsa.doe.gov](mailto:margeau.valteau@nnsa.doe.gov)  
Franchesca P. Ramirez, NA-LA, [franchesca.ramirez@nnsa.doe.gov](mailto:franchesca.ramirez@nnsa.doe.gov)  
Toni K. Chiri, NA-LA, [toni.chiri@nnsa.doe.gov](mailto:toni.chiri@nnsa.doe.gov)  
Elliot S. Avidan, NA-LA, [elliott.avidan@nnsa.doe.gov](mailto:elliott.avidan@nnsa.doe.gov)  
Stephen N. P. Jochem, NA-LA, [stephen.jochem@nnsa.doe.gov](mailto:stephen.jochem@nnsa.doe.gov)  
Mark E. Davis, Triad/DDOPS, [mark.davis@lanl.gov](mailto:mark.davis@lanl.gov)  
Steven A. Coleman, Triad/ALDESHQ, [scoleman@lanl.gov](mailto:scoleman@lanl.gov)  
Jennifer E. Payne, Triad/ALDESHQ, [jpayne@lanl.gov](mailto:jpayne@lanl.gov)  
Jeannette T. Hyatt, Triad/EWP, [jhyatt@lanl.gov](mailto:jhyatt@lanl.gov)

Maxine M. McReynolds, Triad/GC-ESH, [mcreynolds@lanl.gov](mailto:mcreynolds@lanl.gov)  
Andrew G. Thiros, Triad/GC-ESH, [thiros@lanl.gov](mailto:thiros@lanl.gov)  
Brian L. Watkins, Triad/ALDFO, [bwatkins@lanl.gov](mailto:bwatkins@lanl.gov)  
Peter J. Rice, Triad/WFO-DO, [rice@lanl.gov](mailto:rice@lanl.gov)  
Donald R. Hyatt, Triad/WFO-WETF, [hyatt@lanl.gov](mailto:hyatt@lanl.gov)  
Steven L. Story, Triad/EPC-DO, [story@lanl.gov](mailto:story@lanl.gov)  
Katherine J. W. Higgins, Triad/EPC-DO, [kwurden@lanl.gov](mailto:kwurden@lanl.gov)  
Sarah S. Holcomb, Triad/EPC-CP, [sholcomb@lanl.gov](mailto:sholcomb@lanl.gov)  
David P. Fuehne, Triad/EPC-CP, [davef@lanl.gov](mailto:davef@lanl.gov)  
Rebecca R. Lattin, Triad/EPC-CP, [rlattin@lanl.gov](mailto:rlattin@lanl.gov)  
Kris M. Hyatt, Triad/EPC-CP, [kris@lanl.gov](mailto:kris@lanl.gov)  
Jessica L. Moseley, Triad/EPC-WMP, [jmoseley@lanl.gov](mailto:jmoseley@lanl.gov)  
Luciana R. Vigil-Holterman, Triad/EPC-WMP, [luciana@lanl.gov](mailto:luciana@lanl.gov)  
Angela Martinez, Triad/EPC-WMP, [angmtz@lanl.gov](mailto:angmtz@lanl.gov)  
Gregory B. Juerling, Triad/PCIP-DO, [juerling@lanl.gov](mailto:juerling@lanl.gov)  
Steven A. Horak, Triad/CEA-PA, [horak@lanl.gov](mailto:horak@lanl.gov)  
Rosemary Maestas, Triad/CEA-DO, [rmaesta1@lanl.gov](mailto:rmaesta1@lanl.gov)  
Brian G. Harcek, EM-LA, [brian.harcek@em-la.doe.gov](mailto:brian.harcek@em-la.doe.gov)  
Christian T. Maupin, N3B, [Christian.maupin@em-la.doe.gov](mailto:Christian.maupin@em-la.doe.gov)  
Jason O. Roberts, N3B, [Jason.roberts@em-la.doe.gov](mailto:Jason.roberts@em-la.doe.gov)  
John D. Nance, NMED, [jd.nance@env.nm.gov](mailto:jd.nance@env.nm.gov)  
Siona L. Briley, NMED, [siona.briley@env.nm.gov](mailto:siona.briley@env.nm.gov)  
Neelam M. Dhawan, NMED, [neelam.dhawan@env.nm.gov](mailto:neelam.dhawan@env.nm.gov)  
Records Center, NA-LA  
Official Contract File, NA-LA  
[epccorrespondence@lanl.gov](mailto:epccorrespondence@lanl.gov)  
[eshq-dcrm@lanl.gov](mailto:eshq-dcrm@lanl.gov)  
[aldeshqcorrespondence@lanl.gov](mailto:aldeshqcorrespondence@lanl.gov)