



**Environmental Protection and Compliance
Division**

Los Alamos National Laboratory
P.O. Box 1663, MS M-969
Los Alamos, NM 87545
505-667-2211



National Nuclear Security Administration

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

Symbol: EPC-DO-25-328

Date: November 20, 2025

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

**Subject: Fiscal Year 2025 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 office, the National Nuclear Security Administration-Los Alamos Field Office (NA-LA), along with Triad National Security, LLC (Triad), collectively co-Permittees, submit the enclosed report, *Fiscal Year 2025 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 and Triad.

If you have any questions or comments concerning this report, please contact Robert A. Gallegos (NA-LA) at (505) 901-3824 or by email at robert.gallegos@nnsa.doe.gov or Naveen Chennubhotla (Triad) at (505) 629-7401 or by email at naveenc@lanl.gov.

Sincerely,



KATHERINE HIGGINS
(Affiliate)
2025.11.16 20:35:59 -07'00'

Steven L. Story
Division Leader
Environmental Protection and Compliance
Triad National Security, LLC

Sincerely,

ROBERT
GALLEGOS

Digitally signed by ROBERT
GALLEGOS
Date: 2025.11.20 10:28:28 -07'00'

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

SLS/CJ

Enclosures: *Fiscal Year 2025 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*

Copy: w/enclosures

Laurie King, USEPA/Region 6, Dallas, TX, king.laurie@epa.gov
Rick Shean, NMED, 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
Dennis Svatos, NA-LA, dennis.svatos@nnsa.doe.gov
Karen E. Armijo, NA-LA, karen.armijo@nnsa.doe.gov
Robert A. Gallegos, NA-LA, robert.gallegos@nnsa.doe.gov
Stephen Jochem, NA-LA, stephen.jochem@nnsa.doe.gov
Jessica M. Kunkle, EM-LA, jessica.kunkle@em.doe.gov
Brian G. Harcek, EM-LA, brian.harcek@em.doe.gov
Sarah "Ellie" Gilbertson, EM-LA, sarah.gilbertson@em.doe.gov
John H. Evans, EM-LA, john.h.evans@em.doe.gov
Robert Reine, EM-LA, robert.reine@em.doe.gov
Melissa Bitting, Triad, GC-IPER, mbitting@lanl.gov
Chris Stoneback, Triad, GC-IPER, stoneback@lanl.gov
Andrew Thiros, Triad, GC-IPER, thiros@lanl.gov
Steven Coleman, Triad, ALDESHQ, scolem@lanl.gov
Jennifer Payne, Triad, ALDESHQ, jpayne@lanl.gov
Steven L. Story, Triad, EPC-DO, story@lanl.gov
Francesca Trujillo, Triad, EC-DO, francesca@lanl.gov
Jessica L. Moseley, Triad, EPC-WMP, jmoseley@lanl.gov
James M. Eby, Triad, EPC-WMP, jeby@lanl.gov
Cecilia Trujillo, Triad, EPC-WMP, ceciliat@lanl.gov
Naveen Chennubhotla, Triad, EPC-WMP, naveenc@lanl.gov
Bradley Smith, N3B, bradley.smith@em-la.doe.gov
Silas DeRoma, N3B, silas.deroma@em-la.doe.gov

Mark Lesinski, N3B, mark.lesinski@em-la.doe.gov
Christian Maupin, N3B, christian.maupin@em-la.doe.gov
Jennifer Von Rohr, N3B, jennifer.vonrohr@em-la.doe.gov
rcra-permitting@lanl.gov
eshq-dcrm@lanl.gov
locateteam@lanl.gov
epccorrespondence@lanl.gov
lasomailbox@nnsa.doe.gov
RegDocs@EM-LA.DOE.GOV
n3brecords@em-la.doe.gov
EMLA.docs@em.doe.gov
interface@lanl.gov
N3Binterface@em-la.doe.gov



**Environmental Protection and Compliance
Division**

Los Alamos National Laboratory
P.O. Box 1663, MS M-969
Los Alamos, NM 87545
505-667-2211



COPY



National Nuclear Security Administration

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

Symbol: EPC-DO-25-328

Date: November 20, 2025

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

**Subject: Fiscal Year 2025 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 office, the National Nuclear Security Administration-Los Alamos Field Office (NA-LA), along with Triad National Security, LLC (Triad), collectively co-Permittees, submit the enclosed report, *Fiscal Year 2025 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 and Triad.

If you have any questions or comments concerning this report, please contact Robert A. Gallegos (NA-LA) at (505) 901-3824 or by email at robert.gallegos@nnsa.doe.gov or Naveen Chennubhotla (Triad) at (505) 629-7401 or by email at naveenc@lanl.gov.

ENCLOSURE

Fiscal Year 2025 Reporting of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit

Date: November 20, 2025

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



**Fiscal Year 2025 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.


KATHERINE HIGGINS
(Affiliate)
2025.11.16 20:35:24 -07'00'

11/16/2025

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

Date Signed

**ROBERT
GALLEGOS**

 Digitally signed by ROBERT
GALLEGOS
Date: 2025.11.20 10:28:57 -07'00'

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

Date Signed

Fiscal Year 2025 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

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 (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. This report must be submitted to the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) annually, by December 1, for the previous fiscal year ending September 30. This report covers the reporting period October 1, 2024, through September 30, 2025.

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 was one instance of a spill 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.”

Fiscal Year 2025 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

The one instance of a spill occurred at an indoor permitted unit and did not result in migration outside of the building and did not threaten human health or the environment.

TA-55 Mixed Waste Storage Tank System and Mixed Waste Stabilization Unit

On September 12, 2025, operators found a small quantity (4 inches x4 inches) of a tar-like substance on the floor of the permitted unit, which is considered part of the secondary containment system of the unit. After investigation, the source of the tar-like substance was undetermined, but it was verified that the substance did not come from permitted unit operations. The area was thoroughly cleaned the same day and radioactive surveys were taken with no detectable radioactivity. As a result of this event, operators have been instructed to pay special attention to this area when completing their inspection of the permitted unit for any anomalies to ensure continued safe and compliant operations.

The release at this permitted unit was not a risk to the public, human health, or the environment.

Instances of Noncompliance with the Permit

From October 1, 2024, through September 30, 2025, Triad documented a total of fifteen instances of noncompliance with the Permit. These occurrences are provided in Enclosure 1, Table 1. The instances of noncompliance are organized by date of discovery.

Summary of Corrective Actions

As part of LANL's commitment to the environment, health, and safety and 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, 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 2025 Noncompliance Report

Date of Discovery	Permitted Unit Location	Noncompliance	Applicable Permit Section	Quantity of Material	Instances	Period of Noncompliance	Steps Taken to Resolve
11/20/2024	TA-55-4-K13	An inconsistency was identified between the accumulation start date listed on the container label and the date documented in the Operating Record.	2.12.2 Facility Operating Record	1 container	1	6/13/2022 – 8/11/2025	The accumulation start date was updated to ensure the container label and Operating Record are consistent. As part of ongoing process improvements to reduce discrepancies, the unit is transitioning from hardcopy container tracking to electronic tracking in the Operating Record.
3/11/2025	TA-55-4-B40	A hazardous waste management unit worker’s RCRA Refresher training was found to have expired.	2.7 Personnel Training	N/A	1	3/7/2025 – 3/12/2025	The hazardous waste management unit worker completed the required training and documentation of completion was added to the training record. Training check improvements are underway to prevent recurrence above and beyond the existing reminders provided by the facility database for training.
3/12/2025	TA-55-4-B40	An inconsistency was identified between the accumulation start date listed on the container label and the date documented in the Operating Record.	3.6 Waste Container Labeling	1 container	1	3/12/2025*	The accumulation start date on the container label was corrected to match the Operating Record. On-the-job training focused on comparing the Operating Record to facility physical inventory will be conducted.
3/12/2025	TA-55-4-B40	A container had inconsistent labeling compared to the Operating Record.	3.6 Waste Container Labeling	1 container	1	3/12/2025*	A hazardous waste label with the proper EPA hazardous waste numbers and hazard indicators was printed and placed on the container. Process improvements will allow labels to be printed directly from the Operating Record to reduce inconsistencies.

Table 1. Fiscal Year 2025 Noncompliance Report

Date of Discovery	Permitted Unit Location	Noncompliance	Applicable Permit Section	Quantity of Material	Instances	Period of Noncompliance	Steps Taken to Resolve
3/12/2025	TA-55-4-B45	A container had inconsistent labeling compared to the Operating Record.	2.12.2 Facility Operating Record	1 container	1	3/12/2025*	The operating record was updated and a hazardous waste label with the proper EPA hazardous waste numbers and hazard indicators was printed and placed on the container. Process improvements will allow labels to be printed directly from the Operating Record to reduce inconsistencies.
3/12/2025	TA-55-4- K13	A container was physically present at the unit but not listed in the Operating Record.	2.12.2 Facility Operating Record	1 container	1	3/12/2025 – 4/7/2025	A container was listed as decommissioned in the Operating Record while updates were made to the acceptable knowledge information. The status of the container was corrected in the Operating Record. Retraining was conducted to ensure that containers are not removed from the Operating Record unless a container is decommissioned or removed from the unit.
3/12/2025	TA-55-4- K13	A container could not be inspected as stored.	3.8 Inspection Schedules and Procedures	1 container	1	3/12/2025 – 3/31/2025	The container was rotated so that the hazardous waste indicators were visible without moving the container. On-the-job-training regarding inspection and storage requirements will be provided.
3/12/2025	TA-55-4-K13	A container had inconsistent labeling compared to the Operating Record.	2.12.2 Facility Operating Record	1 container	1	3/12/2025 – 4/7/2025	The appropriate EPA hazardous waste numbers were added to the container label to match the Operating Record. As part of ongoing process improvements to reduce discrepancies, the unit is transitioning from hardcopy container tracking to electronic tracking in the Operating Record.

Table 1. Fiscal Year 2025 Noncompliance Report

Date of Discovery	Permitted Unit Location	Noncompliance	Applicable Permit Section	Quantity of Material	Instances	Period of Noncompliance	Steps Taken to Resolve
3/12/2025	TA-55-355	A hazardous waste management unit worker's RCRA Refresher training was found to have expired.	2.7 Personnel Training	N/A	1	3/7/2025 – 3/12/2025	The hazardous waste management unit worker completed the required training and the training record was updated. Training check improvements are underway to prevent recurrence above and beyond the existing reminders provided by the facility database for training.
5/19/2025	TA-55 Mixed Waste Storage Tank System and TA-55 Mixed Waste Stabilization Unit	A written inspection was not recorded.	2.6.3 Inspection Logs and Records	N/A	1	N/A	Personnel were retrained on the requirement for completion of written Inspection Record Forms (IRF).
5/27/2025	TA-60-0017	Gas cylinders labeled hazardous waste were missing the hazard indicator.	3.6 Waste Container Labeling	8 cylinders	1	5/27/2025*	The appropriate hazard indicator was added to each cylinder and label as required by the offsite Treatment, Storage and Disposal Facility.
5/27/2025	TA-60-0017	An inconsistency was identified between the accumulation start date listed on the container label and the date documented in the Operating Record.	3.6 Waste Container Labeling	1 container	1	5/27/2025*	A hazardous waste label with the correct accumulation start date was placed on the container to be consistent with the Operating Record.
6/18/2025	TA-55 Mixed Waste Storage Tank System and TA-55 Mixed Waste Stabilization Unit	A written inspection was not recorded.	2.6.3 Inspection Logs and Records	N/A	1	N/A	A missing IRF was documented in the Operating Record using a memorandum identifying the missing form. Personnel were retrained on the requirement for completion of written IRFs.
9/23/2025	TA-63, Transuranic Waste Facility	A container could not be inspected as stored.	3.8 Inspection Schedules and Procedures	1 container	1	9/23/2025*	The label obstructing the hazardous waste label was removed. On-the-job-training regarding inspection and storage requirements will be provided.

Table 1. Fiscal Year 2025 Noncompliance Report

Date of Discovery	Permitted Unit Location	Noncompliance	Applicable Permit Section	Quantity of Material	Instances	Period of Noncompliance	Steps Taken to Resolve
9/24/2025	TA-55-355	A container had conflicting labels.	3.6 Waste Container Labeling	1 container	1	9/24/2025*	The incorrect excess label was removed and on-the-job training was conducted regarding verification of labels during inspections. Hazardous waste management personnel were provided with compliance guidance to ensure an inspection is completed for excess or erroneous labels when containers are moved to this unit.

*Corrected at time of discovery