



# **Environmental Compliance Programs Group**

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

### **National Nuclear Security Administration**

Los Alamos Field Office 3747 West Jemez Road, A316 Los Alamos, NM 87544 505-665-7314/Fax 505-667-5948

**Symbol:** EPC-DO: 25-319 **Date:** November 25, 2025 **LA-UR:** 25-30934

Locates Action No.: U2200542

Justin Ball, Chief Ground Water Quality Bureau New Mexico Environment Department Harold Runnels Building, Room N2261 Santa Fe, NM 87502

Subject: DP-1132, Condition No. 2, Notification of Changes, Piping Modification at the Waste Management Risk Mitigation Facility, Technical Area 50 Structure 250

Dear Mr. Ball:

On May 5, 2022, the New Mexico Environment Department (NMED) issued Discharge Permit DP-1132 to the U.S. Department of Energy, National Nuclear Security Administration (NNSA) and Triad National Security, LLC (Triad) for discharges of treated effluent from the Technical Area 50 Radioactive Liquid Waste Treatment Facility (RLWTF). Pursuant to Permit Condition Number 2, *Notification of Changes*, a written notification must be submitted to NMED for any changes to the RLWTF's collection, treatment, or disposal system.

The Waste Management Risk Mitigation (WMRM) Facility, Technical Area (TA) 50 Structure 250 is a component of the RLWTF's influent storage system that contains six tanks for the storage of low-level radioactive liquid waste. Two of the influent tanks are used for day-to-day wastewater collection and storage. The four additional tanks are in place for use in emergency or off-normal conditions. One required update at WMRM is to modify the existing piping to enable the transfer of influent received at the facility into and out of each of the six tanks. This will enable the facility to more effectively manage influent received at WMRM. Attachment 1 provides the information required by DP-1132 Permit Condition Number 2, *Notification of Changes*.

Please contact Robert A. Gallegos at (505) 901-3824 or <u>robert.gallegos@nnsa.doe.gov</u> or contact Brian M. Iacona at (505) 500-6038 or <u>biacona@lanl.gov</u> if you have questions regarding this notification.



Mr. Justin Ball, NMED November 25, 2025

EPC-DO: 25-319 Page 2

Sincerely,

SARAH
HOLCOMB
(Affiliate)

Digitally signed by SARAH HOLCOMB
(Affiliate)
Date: 2025.11.20
08:38:19 -07'00'

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

ROBERT Digitally signed by ROBERT GALLEGOS

GALLEGOS Date: 2025.11.20
10:31:29 -07'00'

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

Attachment: Attachment 1 DP-1132 Permit Condition Number 2, Notification of Changes, Piping

Modification at the Waste Management Risk Mitigation Facility, Technical Area 50

Structure 250

Copy: Jason Herman, NMED-GWQB, jason.herman@env.nm.gov

Melanie Sandoval, NMED-GWQB, melanie.sandoval2@env.nm.gov

Caitlin Martinez, NMED-GWQB, caitlin.martinez@env.nm.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

Benjamin A. Shupp, Triad, CWF, bshupp@lanl.gov

Stephen C. Karpi, Triad-TA55-CWF, stephenkarpi@lanl.gov

Alvin M. Aragon, Triad, TA-55-RLW, alaragon@lanl.gov

Raelynn Romero, Triad, TA-55 RLW, raelynn@lanl.gov

Jose P. Hernandez-Ouintero, Triad, TA-55-RLW, jpherna@lanl.gov

Steven A. Coleman, Triad, ALDESHQ, scoleman@lanl.gov

Jennifer E. Payne, Triad, ALDESHQ, jpayne@lanl.gov

Randal S. Johnson, Triad, ESHQ-INT, randyi@lanl.gov

Steven L. Story, Triad, EPC-DO, story@lanl.gov

Katherine J. Higgins, Triad, EPC-DO, kwurden@lanl.gov

Sarah S. Holcomb, Triad, EPC-CP, sholcomb@lanl.gov

Aaron M. Dailey, Triad, EPC-CP, adailey@lanl.gov

Brian M. Iacona, Triad, EPC-CP, biacona@lanl.gov

Karen J. Jackson, Triad, EPC-CP, kjjackson@lanl.gov

Andrew G. Thiros, Triad, GC-ESH, thiros@lanl.gov

epccorrespondence@lanl.gov

eshq-dcrm@lanl.gov

gc-esh@lanl.gov

lasomailbox@nnsa.doe.gov



# **Attachment 1**

DP-1132 Permit Condition Number 2, Notification of Changes, Piping Modification at the Waste Management Risk Mitigation Facility, Technical Area 50 Structure 250

EPC-DO: 25-319

LA-UR-25-30934

Date: <u>November 25, 2025</u>

### **DP-1132 Permit Condition Number 2, Notification of Changes**

Technical Area 50 Structure 250 Waste Mitigation Risk Management Facility Piping Modification

## a. Date process change is planned to be implemented:

This work is expected to begin on or after January 5, 2026.

### b. Narrative of process change:

The Waste Mitigation Risk Management (WMRM) facility, Technical Area (TA) 50 Structure 250 (TA-50-250), contains six influent tanks used to store low-level radioactive wastewater prior to treatment at the Radioactive Liquid Waste Treatment Facility (RLWTF). Two of the influent tanks are used for day-to-day collection and storage of wastewater processed at the RLWTF. The other four influent tanks are held in reserve for use in emergency or off-normal conditions. Upcoming work at WMRM will involve modifying the existing facility piping to connect all of the influent tanks enabling wastewater to more efficiently be transferred between each tank and into the RLWTF for treatment. This modification will provide operational flexibility optimizing the movement of wastewater between the four reserve tanks in the event of an emergency or off-normal condition as well as transfer into the RLWTF for treatment.

# c. Justification for making the process change:

This change is being performed to enable the facility to more effectively manage influent received at WMRM and treated at the RLWTF.

#### d. Units or components being removed from the process:

This work will not remove any units or components from the process.

#### e. Units or components being incorporated into the process:

No additional units or components will be incorporated into the process. Rather, the piping modifications will optimize operational flexibility for collection of influent in the event of emergency or off-normal conditions at the RLWTF.

#### f. Operational controls implemented for the change in processes:

Operational controls that will be incorporated during this work include:

- Any residual wastewater within the existing piping will be contained, collected and processed through the RLWTF.
- Secondary containment will be utilized beneath existing piping being cut that may contain
  wastewater. Additionally, the WMRM basement serves as secondary containment for the
  entire facility.
- Post installation pipe testing will be completed to ensure the system is functioning properly prior to being put into service.

g.	Intended	duration (	of	process	change:

The piping modifications, once complete, will remain in place at WMRM for future use.