



DEPARTMENT OF ENERGY
National Nuclear Security Administration
Los Alamos Site Office
Los Alamos, New Mexico 87544



NOV 05 2012

CERTIFIED MAIL RETURN RECEIPT REQUESTED

John Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Dear Mr. Kieling:

Subject: Notification of General Class I Permit Modification for the Los Alamos National Laboratory Hazardous Waste Facility Permit, EPA ID # NM0890010515

This letter's purpose is to notify the New Mexico Environment Department – Hazardous Waste Bureau (NMED-HWB) of a Class 1 permit modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit issued to the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) in November 2010. The modification includes an address change and corrections to non-substantive typographical errors.

The modification has been prepared in accordance with Code of Federal Regulations, Title 40 (40 CFR) §270.42(a)(1). Both of the changes to the Permit fall under Appendix I within the section. The Contingency Plan requires an address update (Item (B)(6)(d) within Appendix I), and Permit Part 2 requires two typographical corrections (Item (A)(1) of Appendix I). A full description of the permit modification and the necessary changes has been included in Enclosure 1.

The package includes this letter and an enclosure containing a description of the permit modification and text edits of the Permit sections. Accordingly, a signed certification page is also enclosed. Three hard copies and one electronic copy of this submittal will be delivered to the NMED-HWB.

A notice will be sent to the NMED-HWB-maintained LANL facility mailing list in accordance with the conditions specified in 40 CFR 270.42(a)(1)(ii). If you have comments or questions regarding this permit modification, contact Gene Turner of my staff at (505) 667-5794 or Mark Haagenstad, LANS, at (505) 665-2014.

A handwritten signature in black ink that reads 'Kevin W. Smith'. The signature is written in a cursive style with a long horizontal line extending to the right.

Kevin W. Smith
Manager

Enclosure

cc w/enclosure:

Laurie King, Chief (6PD-N)
New Mexico/Federal Facilities Section
Environmental Protection Agency
Region 6 1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

cc w/o enclosure:

Tim Hall
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

P. Maggiore, EPO, LASO
G. Turner, EPO, LASO
C. Beard, PADOPS, LANS, MS-A102
M. Brandt, ADESH, LANS, MS-K491
M. Saladen, ENV-RCRA, LANS, MS-K490
M. Brooks, EO-EM, LANS, MS-C938
C. Lenoie, PMFS-DO, LANS, MS-J910
M. Haagenstad, ENV-RCRA, LANS, MS-K404
Records Center, LASO
Official Contract File, LASO

EPO-32GT-394-476563

ENCLOSURE 1

**General Class 1 Permit Modification Notification
Los Alamos National Laboratory Hazardous Waste Facility Permit
October 2012**

LA-UR-12-25241

Date: **NOV 05 2012** _____

Permit Modification Notification

This document contains a notification for a Class 1 Permit Modification to modify the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit). The text modifications are provided herein and have been made to the Permit by the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), collectively the Permittees. The modifications to the text of the Permit have been identified using red text and red lines through the texts for deletions.

Description

This modification includes three changes. One change includes an address change within the Attachment D, *Contingency Plan*, and the remaining changes correct two typographical errors in Permit Section 2.

Basis

The *Contingency Plan* contains a list of “Primary and Alternate Emergency Manager” contacts and the address for an alternate manager has changed therefore an update of the Permit is necessary in accordance with 40 CFR § 270.42 (a)(1).

The remaining two changes are typographical errors that must be corrected in accordance with 40 CFR § 270.42 (a)(1). After reviewing the 2003 Permit Renewal Application, Revision 2.0, as submitted to the NMED by the Permittees, these errors were not identified to be part of the application. The typographical errors were introduced when the Permit was drafted. At the request of NMED the typographical errors identified in Permit Part 2 are being corrected as part of this Permit modification request.

Discussion

As stated in Section D.1.1 of the Contingency Plan Emergency Management Group “*The Permittees shall ensure that the names, addresses, and telephone numbers listed below are the current Primary and Alternate Emergency Manager.*” Therefore, this modification is being submitted to update the Alternate Emergency Managers list. The modification includes one address change for Dave McClard. The change to the contingency plan is being completed in accordance with 40 CFR § 270.42 Appendix I (B)(6)(d).

In Permit Section 2.6 a 40 CFR reference was transcribed incorrectly from the information provided in the Permit Application. The modification includes changing the reference from 40 CFR § 264.15(b)(i) to 40 CFR § 264.15(b)(1).

In Permit Section 2.8, Figure 16 is included in the list of figures that depict TA boundaries. This section of the Permit was not drafted by the Permittees nor were the figures included in Attachment N. Figure 16 is reserved in the Permit and does not show a TA boundary; therefore at the request of the NMED, the reference to Figure 16 has been removed.

Revised Permit Text

Attachment D, General Contingency Plan

D.1.1 Emergency Management Group

1. The Permittees shall delegate the authority and responsibility for administering and implementing the Facility's emergency management program to the Emergency Operations Division, which includes EM personnel. Emergency Operations Division personnel shall coordinate and issue the Facility's Los Alamos National Laboratory and Los Alamos Site Office Hazardous Materials Program Plan, while EM provides response coordination for emergencies. EM provides a 24-hour Emergency Operations Center for the Facility and a 24-hour Duty Emergency Manager to respond to emergencies, including hazardous and mixed waste releases. The Facility Emergency Manager is the functional equivalent of the Emergency Coordinator (40 CFR § 264.55). The EM maintains an Emergency Operations Center (EOC) in a ready condition, should a center be required. The primary EOC is located at TA-69, Building 33 (TA-69-33). An alternate EOC is located at TA-49-113. Should an EOC be activated during an emergency, additional emergency personnel can be requested by the IC through the EOC.
2. Assignment as the Duty (*i.e.*, primary) Emergency Manager is rotated. The Duty Emergency Manager can be reached 24 hours a day by contacting the EOSC at 667-6211.
3. The Duty Emergency Manager will respond to emergency incidents involving the release of hazardous or mixed waste to the environment, including spills, fires, and explosions. With input from the appropriate Facility groups, the Duty Emergency Manager shall initially assess the possible hazards to human health or the environment and, if assuming incident command, shall use whatever response personnel and/or emergency equipment necessary to control and contain the waste. In the event of an emergency, the Emergency Manager typically becomes the IC with full responsibility for field activities. As described previously, the exception to this is when on-site personnel can adequately address the emergency and maintain incident command internally.
4. The Duty Emergency Manager responding to an emergency shall have access to a copy of the appropriate building emergency plan(s) (BEP) for the area in which the incident is occurring. These plans shall be maintained by the facility manager where a waste management unit is located and shall be available at the EOC at TA-69; they are also located on site for use by emergency response personnel. The various response groups shall obtain specific information relating to the facilities involved (including the layout of all affected buildings; the location of evacuation routes, equipment, and personnel; properties of the materials/wastes managed at the facility; and the hazards associated with these materials/wastes) from the BEP(s) and other site-specific information.
5. The Permittees shall ensure that the names, addresses, and telephone numbers listed below are the current Primary and Alternate Emergency Manager.

Primary:

Brenda Anderson
3926 A Alabama
Los Alamos, NM
(H) 505-662-4173
(W) 505-667-6211
(C) 505-699-1144

Alternates:

Manny L'Esperance
13 Paseo Paltron
Los Alamos, NM
(H) 505-660-9799
(W) 505-667-6211
(C) 505-699-1383

Joyce Boyet
125 Private Rd. 1153
Española, NM
(H) 505-753-6108
(W) 505-667-6211
(C) 505-412-9997

Ron Huerta
P.O. Box 923
Española, NM
(H) 505-852-0286
(W) 505-667-6211
(C) 505-412-8434

Wil Martinez
120 A RA CR 92
Chimayo, NM
(H) 505-351-2340
(W) 505-667-6211
(C) 505-412-8135

Dave McClard
~~2220 A 36 Street~~
~~Los Alamos, NM~~
23 Ojito Drive
Española NM
(H) 505-412-8945
(W) 505-667-6211
(C) 505-699-0803

Permit Part 2 General Facility Conditions

2.6 GENERAL INSPECTION REQUIREMENTS

The Permittees shall inspect all the permitted units for malfunctions, deterioration, operator errors, and discharges which may cause or may lead to:

- (1) a release of hazardous constituents to the environment; or
- (2) a threat to human health.

(see 40 CFR § 264.15(a))

Inspections shall be conducted of all waste management structures, base materials, containers, monitoring equipment, safety and emergency equipment, security devices, and operating equipment that are important in preventing, detecting, and responding to environmental or human health hazards associated with hazardous wastes (see 40 CFR § 264.15(b)(1)).

2.8 SPECIAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

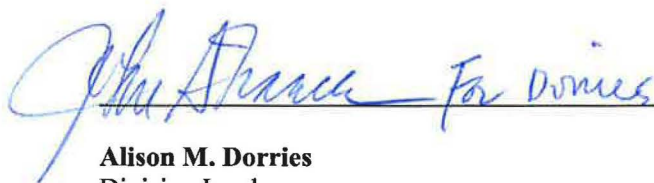
The Permittees shall manage ignitable, reactive, and incompatible hazardous wastes in containers and tanks in compliance with the requirements of 40 CFR §§ 264.17, 264.176, 264.177, 264.198, and 264.199, which are incorporated herein by reference, and Permit Parts 3 and 4. The Permittees shall ensure that containers holding ignitable or reactive wastes are located at least 15 meters from the facility boundary defined as the technical area (TA) specific boundary identified in Figures 11, ~~16~~, 22, 24, and 38 in Permit Attachment N (*Figures*) (see 40 CFR §§ 264.176 and 270.32(b)(2)).

Document: General Class 1 Permit Modification

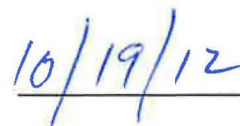
Date: October 2012

CERTIFICATION

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.



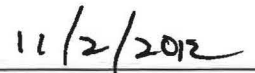
Alison M. Dorries
Division Leader
Environmental Protection Division
Los Alamos National Laboratory
Operator



Date Signed



Kevin W. Smith
Manager
Los Alamos Site Office
National Nuclear Security Administration
U.S. Department of Energy
Owner/Operator



Date Signed



DEPARTMENT OF ENERGY
National Nuclear Security Administration
Los Alamos Site Office
Los Alamos, New Mexico 87544



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COPY

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Kevin W. Smith
Manager

Enclosure