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Date:

FEB 2 7 2014 ENV-DO-14-0023

Symbol: LAUR:

13-29257

Mr. John E. Kieling Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505

Dear Mr. Kieling:

Subject:

Transmittal of Class 1 Permit Modification to Update Figures in the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit,

EPA ID No. NM0890010515

The purpose of this letter is to submit a Class 1 permit modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit issued to the Department of Energy and Los Alamos National Security, LLC (DOE/LANS) in November 2010. The permit modification provides revisions to figures in Permit Attachments N and G and updates that are related to figure changes in Permit Attachments A, G and J.

The proposed modifications have been prepared in accordance with the Code of Federal Regulations [CFR], Title 40 (40 CFR) § 270.42(a). This Class 1 permit modification consists solely of administrative changes in accordance with 40 CFR § 270.42, Appendix I, Item A.1 and Permit Section 3.1(3).

This permit modification package includes this transmittal letter and an enclosure with a description of changes; pages of the revised portions of Attachments A, G, and J; as well as replacement figures for both Attachments N and G of the Permit (LA-UR-13-29257). Accordingly, a signed certification page has also been included.

Included herein are three hard copies and one electronic copy of this submittal. The hardcopy submittal contains pages or sections where text has been changed rather than copies of the entire



collection of Permit attachments. The electronic copy contains a reproduction of the hardcopy in portable document format (PDF) along with all the word processing files used to create the hardcopy.

Notification of this modification will be sent to the New Mexico Environment Department Hazardous Waste Bureau maintained LANL facility mailing list in accordance with 40 CFR § 270.42(a)(1)(ii) within seven days of the transmittal of this permit modification.

If you have comments or questions regarding this permit modification, please contact Gene Turner (DOE) at (505) 667-5794 or Mark Haagenstad (LANS) at (505) 665-2014.

Sincerely,

Alison M. Dorries Division Leader

Environmental Protection Division Los Alamos National Security LLC Sincerely,

Kimberly Davis Lebak

Manager

Los Alamos Field Office U.S. Department of Energy

AMD/GET/MPH/TD:lm

Enclosure: Class 1 Permit Modification Notification Structure Changes at Technical Area 54

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ENCLOSURE 1

CLASS 1 PERMIT MODIFICATION NOTIFICATION STRUCTURE CHANGES AT TECHNICAL AREA 54

ENV-DO-14-0023

LAUR-13-29257

Date:	FEB 2 7 2014	
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Document: LANL Class 1 Permit Mod **Date:** February 2014

Permit Modification Notification

This document contains a notification for a Class 1 Permit Modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit) issued to the Department of Energy and the Los Alamos National Security, LLC, collectively known as the Permittees, in November 2010. All proposed changes are shown in redline strikeout for Permit Attachments J (Table J-1), A, G.9, and G.10. These changes as well as the replacement figures for Attachments N and G are enclosed as Attachment 1 to this modification.

Description

The purpose of this modification submittal is to update figures in Attachments N (Figures); and G (Closure Plans); and to update portions of Table J-1 of Attachment J (Hazardous Waste Management Units); Attachment A (Technical Area (TA) Unit Descriptions); G.9 (Technical Area 54, Area G, Pad 6 Outdoor container Storage Unit Closure Plan); and G.10 (Technical Area 54, Area G, Pad 9 Outdoor Container Storage Unit Closure Plan) that are related to the figure changes. This modification includes either the removal or relocation of structures not associated with the permitted units or labeling of structures not previously labeled on the figures.

Basis

This modification has been prepared in accordance with Code of Federal Regulations, Title 40 §270.42 Appendix I, Item A.1, and with Permit Section 3.1(3).

Discussion of Changes

Figures 7 (Technical Area 54, Area L, Security Fences, Entry Gates, and Entry Stations) and 26 (Technical Area 54, Area L, Container Storage Unit) of Permit Attachment N, were revised to remove structure 54-46, the temporary fence, and the outline for the Perma-Con® located at the south end of structure 54-0032. As stated in the *Request for Class 2 Permit Modifications to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit* letter dated March 29, 2007, a proposal was made to relocate the Perma-Con® from the 54-36 structure to the 54-32 structure. The Perma-Con® was not relocated and was decommissioned instead. Additionally, the temporary fence shown in Figure 26 of Attachment N was not erected and therefore is not included in the revised figure. Structure 54-46 was removed from Area L; however, the structure was not designated as a structure that managed hazardous waste associated with the Area L container storage unit. Structure 54-0562, also not designated as a structure that manages hazardous waste associated with the permitted unit, has been added to Area L.

Figure 27 (Technical Area 54, Area G, Container Storage Units) of Attachment N was revised significantly to either remove structures that have been relocated or removed completely from Area G, to show the placement of new structures at Area G, or to label existing structures. Additionally, as a result of the Figure 27 update, some of the larger scale figures for units at TA-54

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Area G, were also updated (where applicable) to reflect similar changes (see below) and to ensure the figures in Attachment N are consistent. The changes to Figure 27 are as follows:

• Consolidated Pad No. 5- One of the five storage sheds was removed from the northern part of the pad, and two structures were removed from the center of the pad. All three structures removed were designated as structures that were not associated with the permitted unit and were not used to manage hazardous waste.

- Pad No. 6- Structure 54-0491 is a structure that is used for the storage of hazardous waste; however, in Figure 27 it was not identified as such nor was it labeled. The update to this figure includes labeling of Structure 54-0491 and designating it as a structure associated with the permitted unit. Storage Sheds 54-522 and 54-523 were removed from Pad 6 and Figure 27 has been updated to reflect this change. Storage Sheds 54-522 and 54-523 were designated as structures that were not associated with the permitted unit and were not used to manage hazardous waste.
- Pad No. 11- Pad 11 had three concrete barriers which are no longer present; therefore the
 two barriers were removed from Figure 27. Structure 54-0362 (RTR1) is associated with the
 permitted unit; however in Figure 27 it was not identified as such nor was it labeled. The
 update to this figure includes labeling of Structure 54-0362 (RTR1) and designating it as a
 structure associated with the permitted unit.
- Pad No. 9- Storage Shed 54-574 was moved and is currently located north of Dome 232.
 Storage Shed 54-484 was removed from the pad. Both 54-484 and 54-574 are designated as structures that are not associated with the permitted unit and are not used to manage hazardous waste.
- Pad No. 10- The structures located on Pad 10 were not labeled and were not clearly
 identified as structures used to manage hazardous waste. Figure 27 was updated to label
 the structures and to identify them as structures associated with the permitted unit.

Figure G.8-1 (Technical Area 54, Area G, Pad 5, Outdoor Container Storage Unit Soil Sampling Grid and Additional Sampling Locations) of Attachment G.8 and Figure 32 (Technical Area (TA)-54, Area G, Pad 5 (Domes 49 and 224; Storage Sheds 144, 145, 146, 177, 1027, 1028, 1030 and 1041) of Attachment N, were modified to remove structures 54-465, 54-527, and 54-356. These structures were removed from the pad and Figures G.8-1 and 32 were updated to reflect this change. Additionally, a maintenance gate, located on the west side of the fence line was added to the figures. This change is consistent with the current Figure 8 of Attachment N.

Figure G.9-1 (Technical Area 54, Area G, Pad 6 Outdoor Container Storage Unit Sampling Grid and Additional Sampling Locations) of Attachment G.9 and Figure 33 (Technical Area (TA)-54, Area G, Pad 6, (Domes 153 & 283)) of Attachment N were revised to remove structures 54-522 and 54-523. These structures were designated as structures that were not associated with the permitted unit and were not used to manage hazardous waste. The figure was also updated to reflect the addition

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of a structure on the inside of structure 54-0283 that is not used to manage hazardous waste at the permitted unit.

Figure G.10-1 (Technical Area 54, Area G, Pad 9 Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations) of Attachment G.10 and Figure 28 (Technical Area (TA)-54 Area G, Pad 9, (TWISP Domes 229, 230, 231 & 232)) of Attachment N were revised to remove storage shed 54-484 from Pad 9 and to show that storage shed 54-574 was relocated to an area northwest of Dome 232. These storage sheds are designated as structures that are not associated with the permitted unit and are not used to manage hazardous waste.

Figure 34 (Technical Area (TA)-54, Area G, Storage Shed 8) did not include a legend or scale. Therefore, this figure was revised to provide map details.

Figure G.12-1 (Technical Area 54, Area G, Pad 11 Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations) of Attachment G.12 and Figure 36 (TA-54, Area G, Pad 11) of Attachment N were revised to remove structure 54-57 from the southwest corner of the pad as well as the three concrete barricades (XXX3, XXX4 and XXX5) located on the northeast portion of the pad. Structure 54-57 was designated as a structure not associated with the permitted unit and it was not used to manage hazardous waste.

Figure G.17-1 (Technical Area 54, West Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations) of Attachment G.17 was revised to remove structures 54-34 and 54-455 (these structures were located outside of the permitted unit) and to make the fence line continuous along the northwest boundary of the permitted unit. Structure 54-34 previously served as part of the fence line boundary for the permitted unit. The structure was removed and the fence around the unit was completed to demarcate the boundary of the permitted unit.

Figure 9 (Technical Area (TA) 54 West Location Map Showing Security Fences, Entry Gates and Entry Stations) and Figure 37 (Technical Area (TA) 54 West, Building 38 Indoor (High Bay and Low Bay) and Outdoor Pad) were revised to remove Structure 54-34 and to make the fence line continuous. Structure 54-34 previously served as part of the fence line boundary for the permitted unit. The structure was removed and the fence around the unit was completed to demarcate the boundary of the permitted unit.

Within Attachment J, Table J-1 (Active Portion of the Facility), on page 4, the row for TA-54 Area G, Pad 6 was revised to remove the listing of Storage Sheds 54-522 and 54-523 and Storage Shed 54-484 from the row for TA-54-Area G, Pad 9.

Attachment A (Technical Area (TA) – Unit Descriptions), Section A.4.2.6 (Pad 6) and Attachment G.9 (Technical Area 54, Area G, Pad 6 Outdoor Container Storage Unit Closure Plan), were revised to include a description of the control room that is located within Dome 283. The control room is approximately 20 feet (ft) long and 8 ft wide with a height of 8 ft. The control room is located next

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to the associated assay equipment used to certify waste for the Waste Isolation Pilot Plant (WIPP) facility.

Attachment G.10 (Technical Area 54, Area G, Pad 9 Outdoor Container Storage Unit Closure Plan) was revised to remove the discussion of Storage Shed 54-484. As mentioned above Storage Shed 54-484 was removed from Pad 9.

Attachment 1 Pages of the replacement figures for both Attachments N and G and revised Attachments A, G and J
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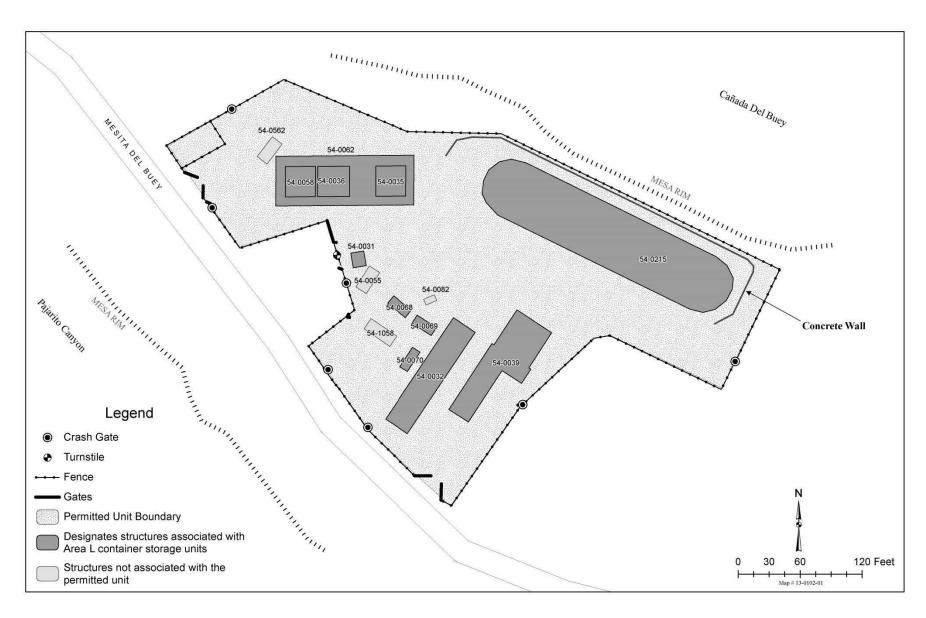


Figure 7: Technical Area 54, Area L, Security Fences, Entry Gates, and Entry Stations

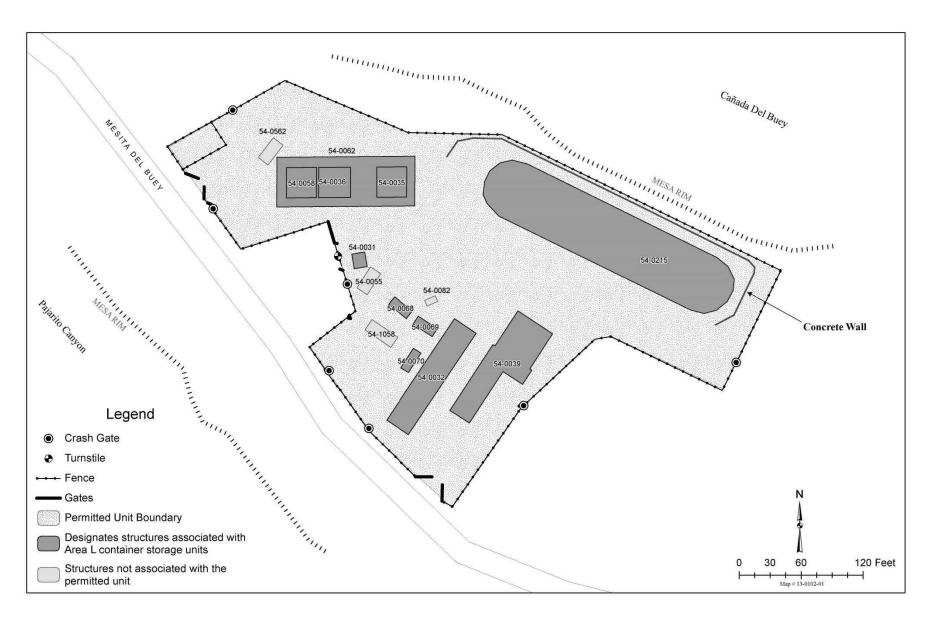


Figure 26: Technical Area 54, Area L, Container Storage Unit

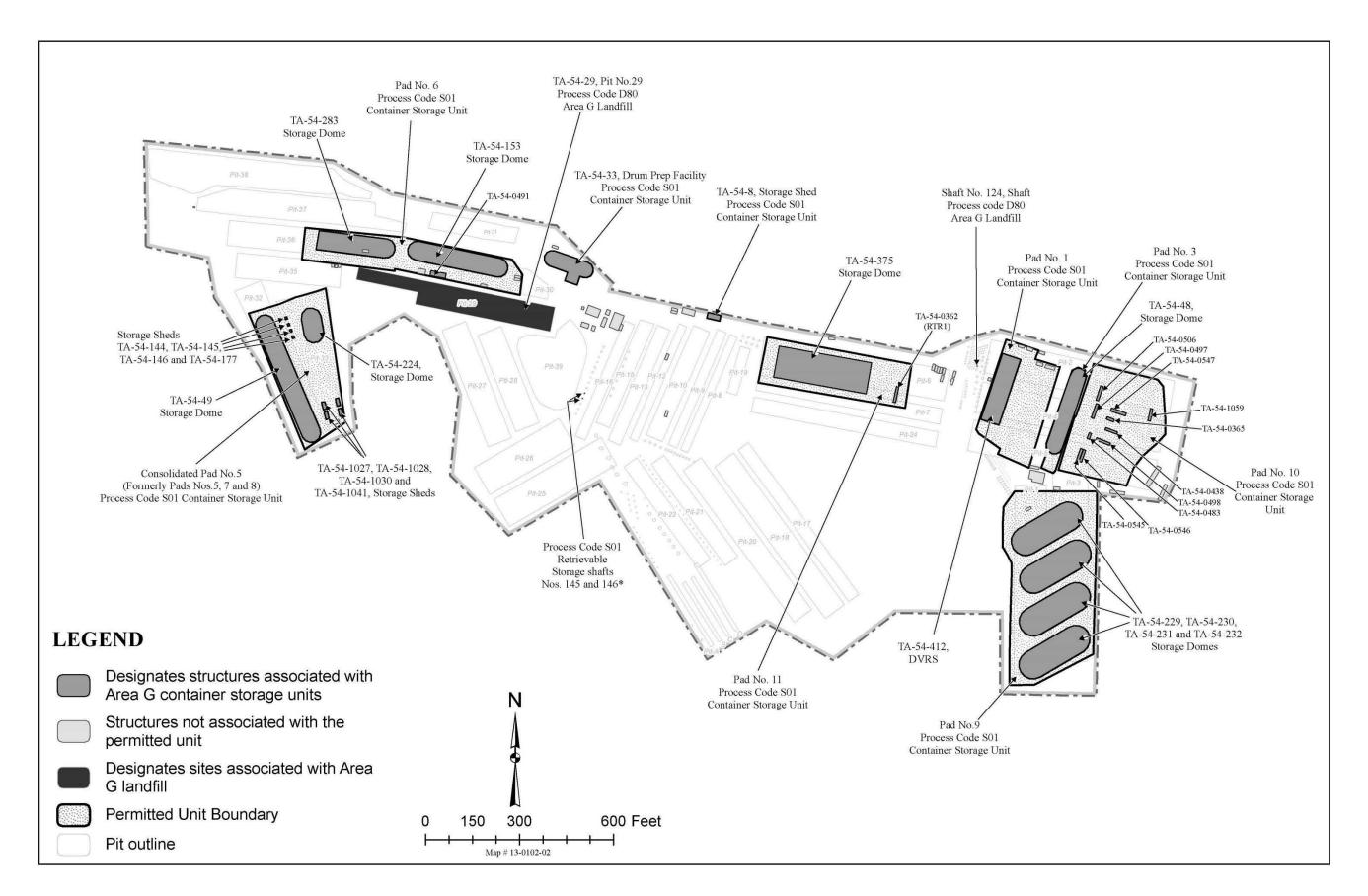


Figure 27: Technical Area 54, Area G, Container Storage Units

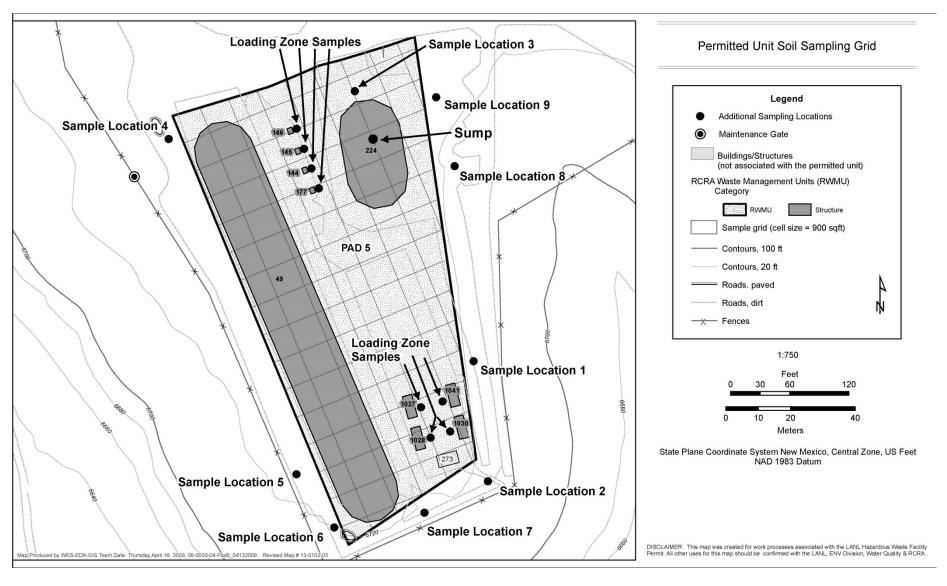


Figure G.8-1: Technical Area 54, Area G, Pad 5, Outdoor Container Storage Unit Soil Sampling Grid and Additional Sampling Locations

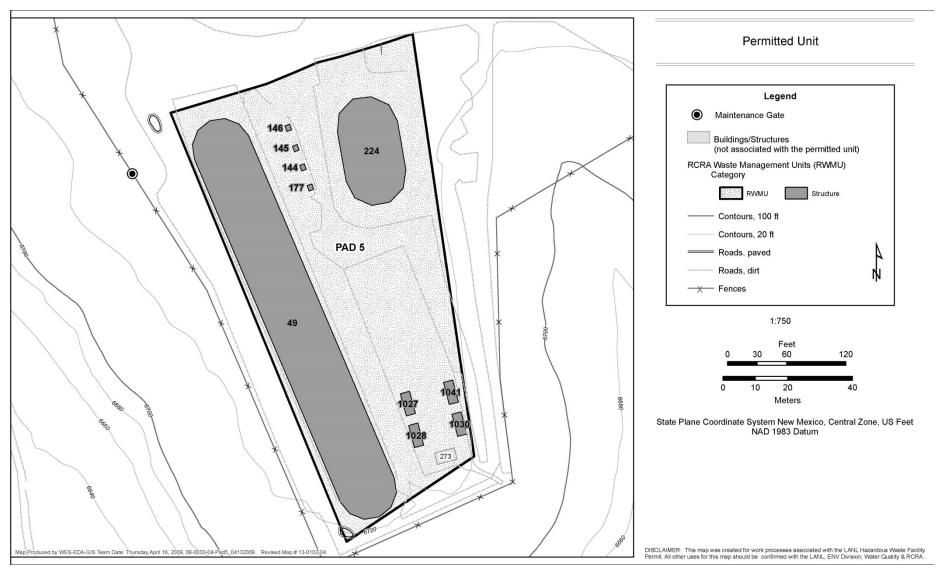


Figure 32: Technical Area (TA)-54, Area G, Pad 5 (Domes 49 and 224; Storage Sheds 144, 145, 146, 177, 1027, 1028, 1030, and 1041)

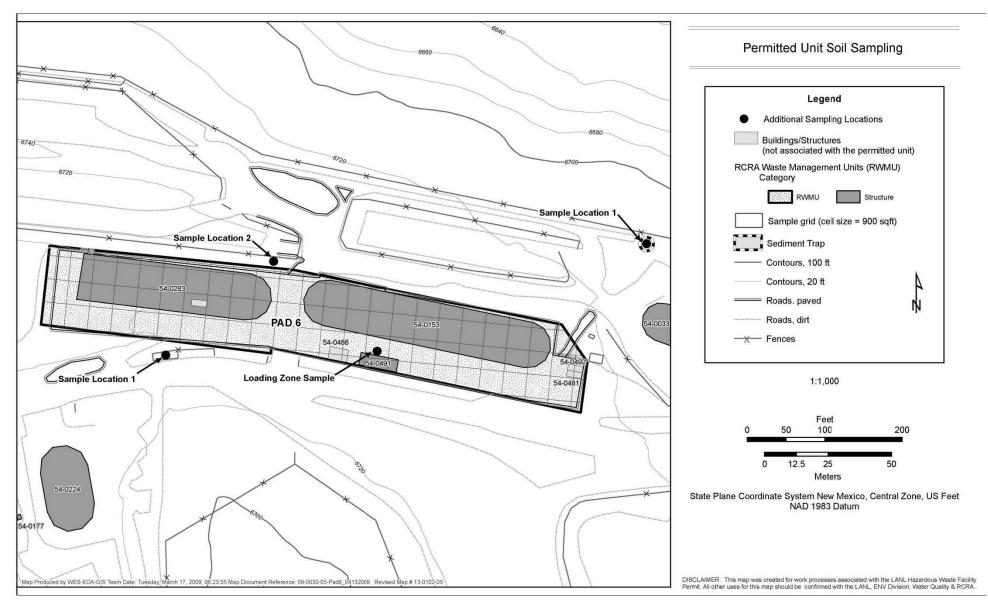


Figure G.9-1: Technical Area 54, Area G, Pad 6 Outdoor Container Storage Unit Sampling Grid and Additional Sampling Locations

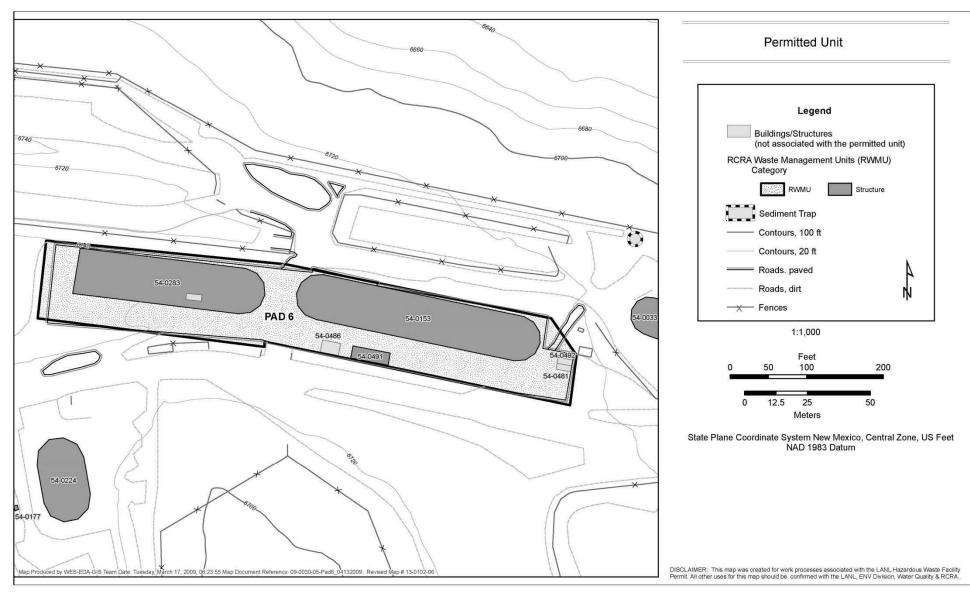


Figure 33: Technical Area (TA)-54, Area G, Pad 6, (Domes 153 & 283)

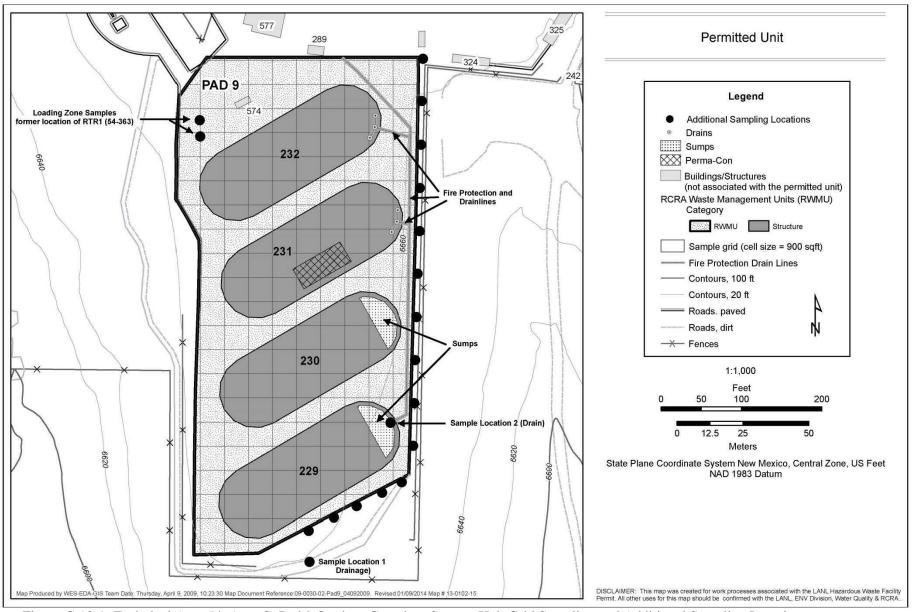


Figure G.10-1: Technical Area 54, Area G, Pad 9 Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations

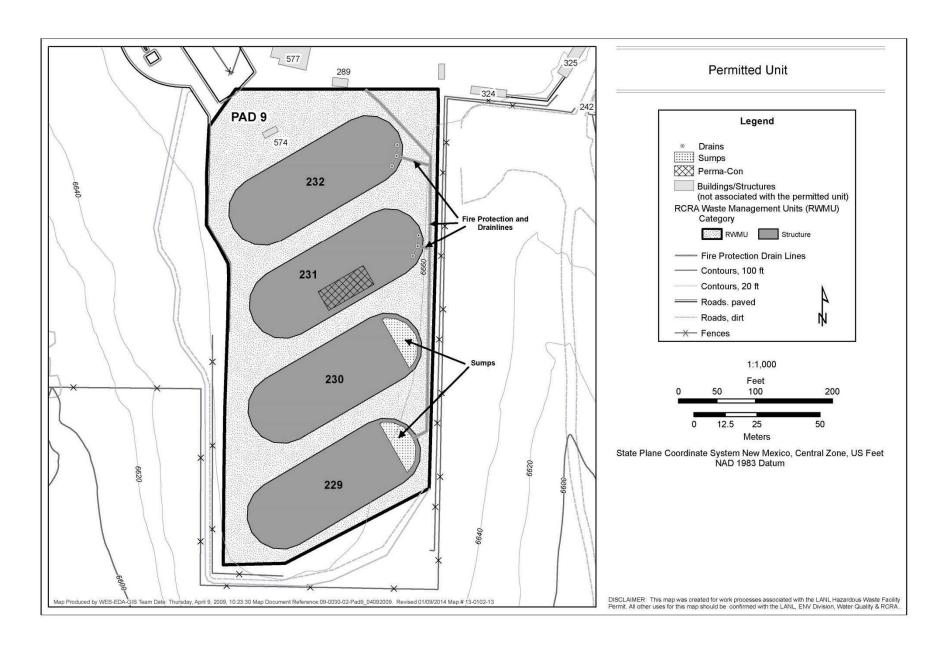


Figure 28: Technical Area (TA)-54, Area G, Pad 9 (TWISP Domes 229, 230, 231 & 232)

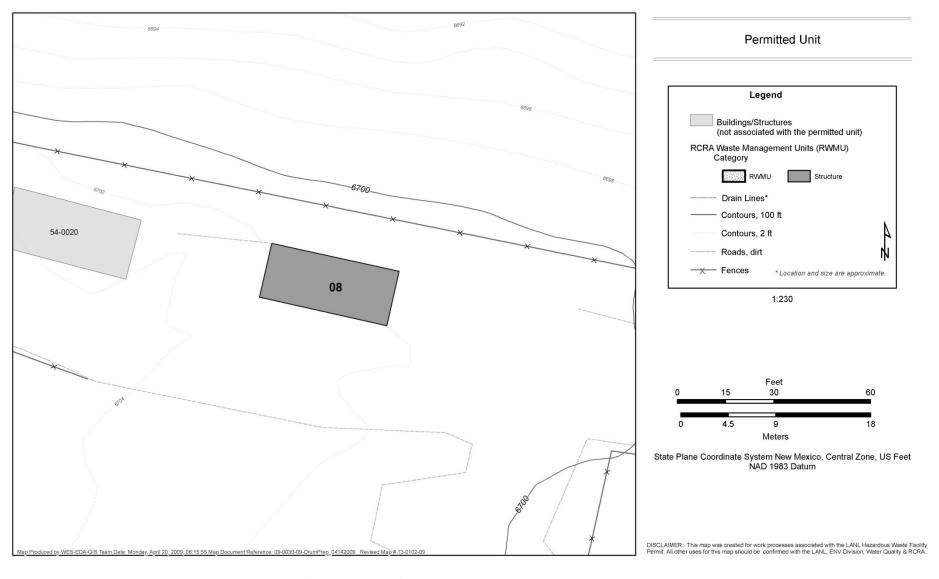


Figure 34: Technical Area (TA)-54, Area G, Storage Shed 8

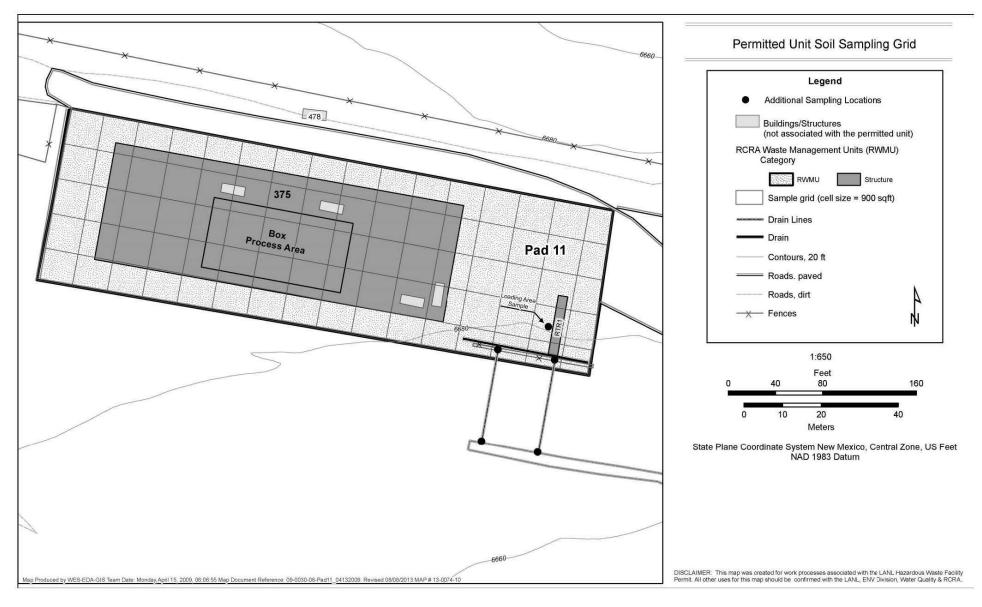


Figure G.12-1: Technical Area 54, Area G, Pad 11 Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations

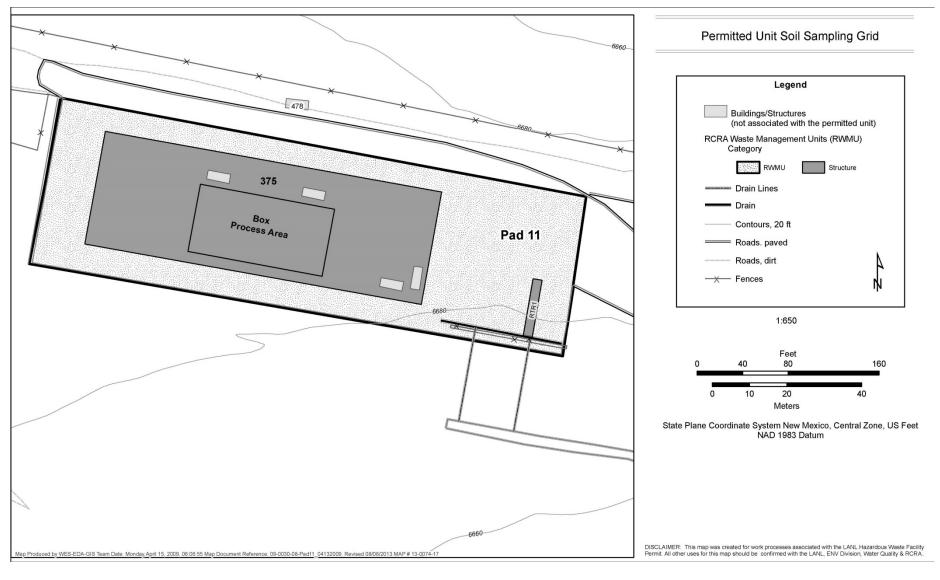


Figure 36: TA-54, Area G, Pad 11

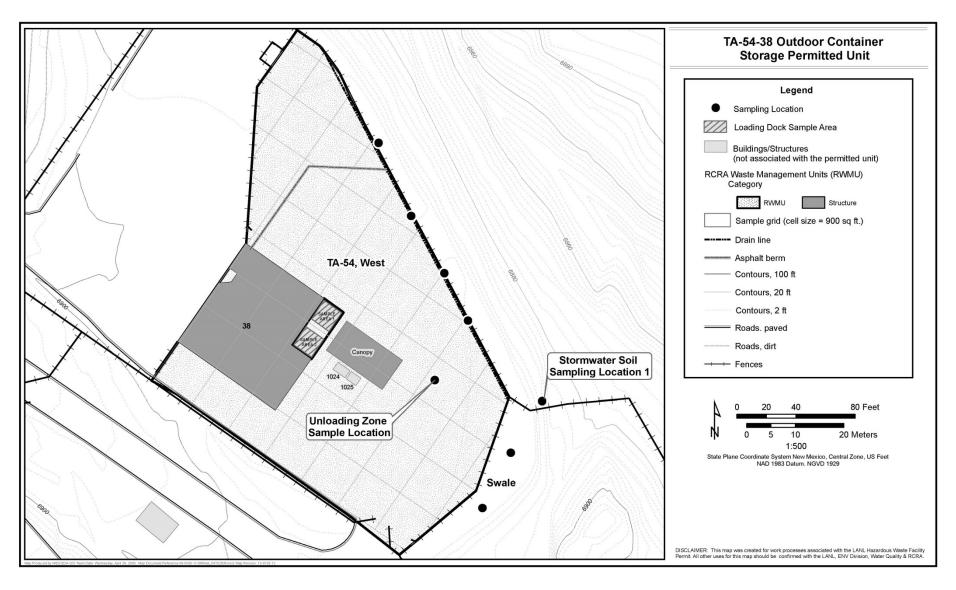


Figure G.17-1: Technical Area 54 West Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations

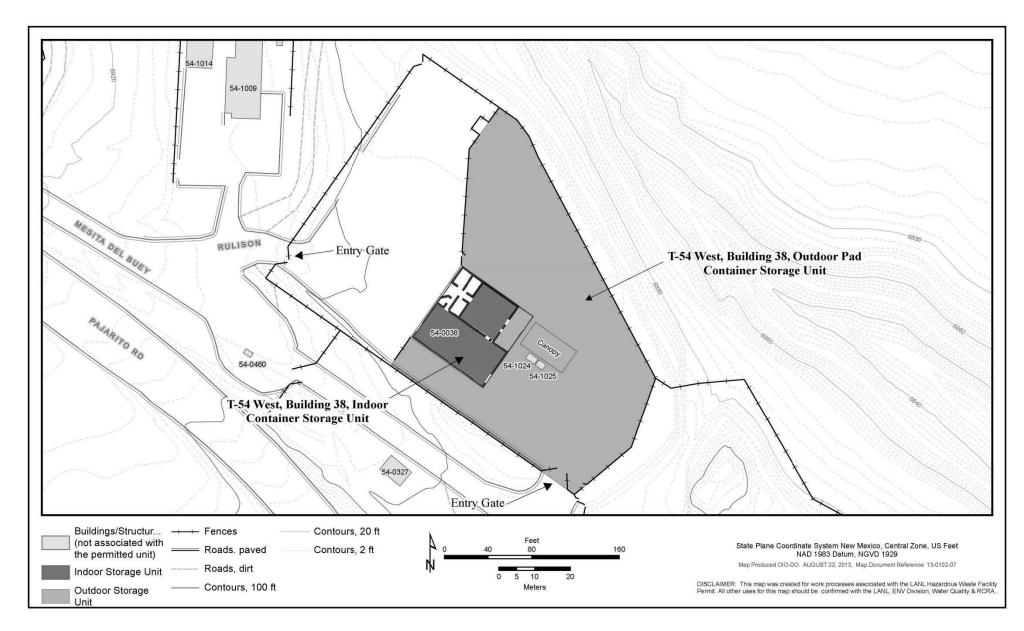


Figure 9: Technical Area (TA) 54 West Location Map Showing Security Fences, Entry Gates, and Entry Stations

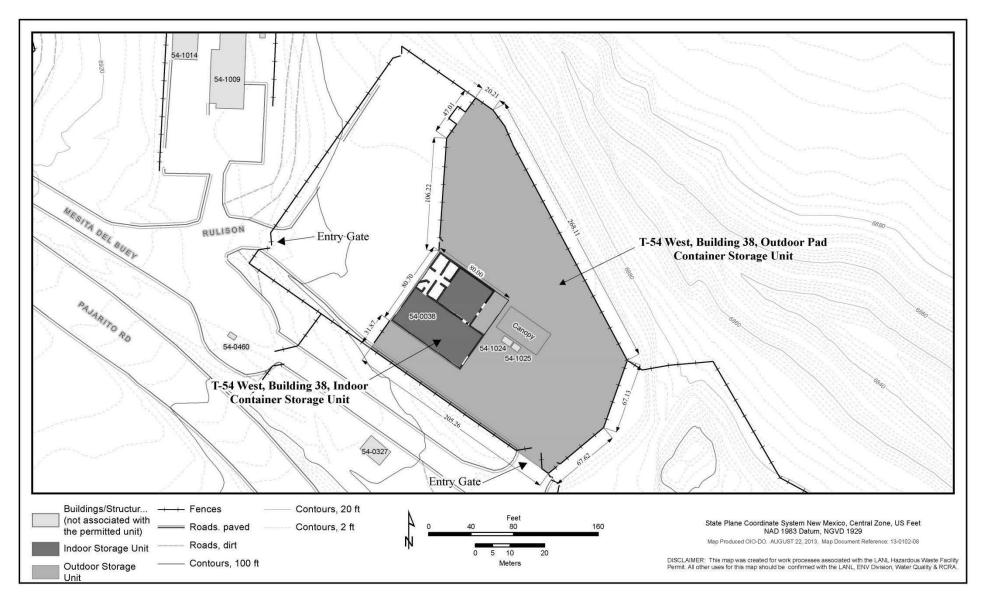


Figure 37: Technical Area (TA) 54 West, Building 38 Indoor (High Bay and Low Bay) and Outdoor Pad

ATTACHMENT J HAZARDOUS WASTE MANAGEMENT UNITS

Unit Identifier	Process Codes	Operating Capacity	General Information	Type of Unit
TA-54 Area G	S01	213,840 gal	Includes Storage Dome 48	Outdoor (associated with a regulated unit)
Pad 3			Approximately 17,000 square feet	
TA-54 Area G Pad 5	S01	623,480 gal	Includes Storage Domes 49 and 224; Storage Sheds 144, 145, 146, 177, 1027, 1028, 1030, and 1041	Outdoor (associated with a regulated unit)
			Pad 5 is a consolidation of former Pads 5, 7, and 8.	
			Total square footage – 59,900	
TA-54 Area G Pad 6	S01	597,300 gal	Includes Storage Domes 153 and 283; Transportainer 491; and Storage Sheds 486, 522, 523_, and 492. Approximately 62,700 square	Outdoor (associated with an regulated unit)
			feet	
TA-54 Area G Pad 9	S01	1,446,720 gal	Includes Storage Domes 229, 230, 231, and 232; and Storage Shed_s-574 and 484.	Outdoor (associated with a regulated unit)
			Total square footage – 158,000	
TA-54 Area G Pad 10	S01	159,770 gal	Includes Transuranic (TRU) Waste Characterization Facilities: TA-54-0547 (SuperHENC), TA-54-0497 (RTR2), TA-54-0498 (LANL HENC), TA-54-0506 (MCS HENC), TA-54-0545 and 546 (Storage trailers), TA-54-0365 (Office Building Formerly MTGS), TA-54-0483 (Source Storage Trailer), and TA-54- 1059 (Storage Trailer)	Outdoor (associated with a regulated unit)
			Pad 10 is a consolidation of former Pads 2 and 4.	
			Approximately 89,600 square	

ATTACHMENT A TECHNICAL AREA (TA) - UNIT DESCRIPTIONS

dome and 10 personnel doors are located approximately every 40 to 125 ft along the dome's length.

Dome 283

Dome 283 is approximately 260 ft long and 60 ft wide with a peak height of 26 ft (*see* Figure 33 in Attachment N (*Figures*)). A double-panel rolling door is located at the east end of the dome and 10 personnel doors are located approximately every 50 ft along the dome's length. These accesses allow adequate traffic flow of vehicles and personnel into and out of the dome. An asphalt ramp is located at the vehicle entrance of each dome to allow vehicles and container-handling equipment to pass safely over the curb. Domes 153 and 283 are anchored to Pad 6 with standard drift pins. A control room is located within Dome 283. The control room is approximately 20 ft long and 8 ft wide with a height of 8 ft.

A.4.2.7 Storage Shed 8

Storage shed 8 is located in the north-central portion of Area G (*see* Figure 34 in Attachment N (*Figures*)). The shed is 40 ft long and 16 ft wide and has a 14-ft-high galvanized steel roof that slopes to the north. The siding of Shed 8 is constructed of galvanized steel and the foundation is constructed of concrete. Two overhead doors and one personnel door on the south side of the shed allow both vehicles and personnel to access the shed.

A.4.2.8 TA-54-33

TA-54-33 is located in the north-central portion of Area G and consists of a dome attached to a concrete-block building (*see* Figure 35 in Attachment N (*Figures*)). This permitted unit is used for waste storage and potential or future waste characterization activities. The dome and building are located on a concrete foundation surrounded by an asphalt pad. The concrete foundation is 8 inches thick and overlies 6 inches of base course. The concrete-block building attached to the dome is approximately 40 ft long and 34 ft wide. The dome is 157 ft long and 50 ft wide with a peak height of 24 ft. A double-panel rolling door is located at the west end of the dome for vehicle access. A single-panel rolling door is located at the southeast end of the dome for container-handling access. Two personnel doors are located approximately 40 ft apart along the north wall of the dome. Two additional personnel doors are located in the concrete-block building; one on the west side, and one on the east side. In addition, two overhead doors are located on the north side of the building to allow free movement of personnel and container-handling equipment between the building and the dome.

The design and materials of construction for the TA-54-33 dome are the same as the other domes at TA-54. The dome's aluminum frame is directly connected to the building which extends approximately 5 ft into the dome. Inside the dome the concrete foundation is sloped to a 6-inch-wide centralized concrete drainage trench that is covered with 12-inch-wide steel grating. The trench slopes toward a steel sump located at the east end of the dome. Two additional trenches, located in Rooms 100A and 100B, are perpendicular to and feed into the main trench. A floor drain in Room 105 connects with the trench in Room 100A.

Los Alamos National Laboratory Hazardous Waste Permit November 2010

ATTACHMENT G.9 TECHNICAL AREA 54, AREA G, PAD 6 OUTDOOR CONTAINER STORAGE UNIT CLOSURE PLAN

1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at Technical Area (TA)-54, Area G, Pad 6 at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions to the plan, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere with the Permit are described below.

The permitted unit is comprised of Pad 6 and is located in the north-central portion of Area G. The pad measures 633 feet long and 99 feet wide or approximately 62,700 square feet. The pad consists of a four to six inch layer of asphalt over the underlying base course overlying fill (minimum six inches of tuff). The pad is sloped from 1% to 1.5% to the south and east for drainage. Additional drainage is directed to the north and east. Rainwater flow at the permitted unit is directed primarily across the pad by the southward slope and into a ditch that runs parallel to the south side of the pad and then drains to the south side of Area G. Secondary rainwater flow is directed to the north/northeast portion of the pad.

Hazardous waste in both liquid and solid form is stored in Domes 153 and 283 on the pad and within transportainer 491 on the south end of the permitted unit; none of these structures are equipped with sumps. The two storage domes (an aluminum framework of trusses covered with tension-fitted ultraviolet resistant, fire-retardant coated, polyester fabric) on the permitted unit vary in size. Dome 153 is 326 feet long by 60 feet wide, covers a surface area of approximately 19,600 square feet, has a double-panel rolling door located at the west end, and has ten personnel doors located approximately every 40 to 125 feet along its length. Dome 283 is 260 feet long by 60 feet wide, covers an area of approximately 15,600 square feet, has a double-panel rolling door located at the east end, and has ten personnel doors located approximately every 50 feet along its length. The base of each dome is secured with standard drift pins. A 6-inch by 8-inch high asphalt curb surrounds the interior floor perimeter of both domes and provides run-on and run-off protection. The curb is designed to retain any liquids that may accumulate within the domes. An asphalt ramp is located at the vehicle entrance (*i.e.*, double-panel rolling door) to each dome which allows vehicles and container handling equipment to pass safely over the curb. Dome 283 also contains a Conex structure that serves as a control room. The control room is approximately 8 feet wide, 20 feet long and 8 feet high.

Los Alamos National Laboratory Hazardous Waste Permit June 2011

ATTACHMENT G.10 TECHNICAL AREA 54, AREA G, PAD 9 OUTDOOR CONTAINER STORAGE UNIT CLOSURE PLAN

1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at Technical Area (TA)-54, Area G, Pad 9 at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions to the plan, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8 to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The permitted unit is comprised of an asphalt pad which is located in the eastern end of Area G. It was constructed in 1993, consists of a four to six inch layer of asphalt over the underlying base course overlying fill (minimum six inches of tuff), and measures 570 feet long and 275 feet wide, or approximately 158,000 square feet. It is constructed with curbing on the west and east sides and is sloped from 1% to 1.5% to the east and south-east for drainage. Rainwater flow is directed across the pad by the eastward slope and through small PVC drains spaced at 55 foot intervals in the curbing along the east side of the pad. The slope below the curbing is protected with rock and concrete. Concrete curbing also extends along the west and partially the south sides of the pad and ends at a concrete and rock drainage structure. The remainder of the south side of the pad is uncurbed. Four domes (Domes 229, 230, 231, 232), and one two storage sheds (484 & 574) are situated on it (see Figure G.10-1). The two storage sheds is are not used for the storage of hazardous waste.

The permitted unit has stored the following waste types: solidified inorganic solids; leached process residues; salts and cement paste; ash; dewatered aqueous sludge; chemical treatment sludge; soils; combustible debris (e.g., plastics, rubber, laboratory trash, building debris); and heterogeneous debris. Permit Part 3 (Storage in Containers), Permit Attachment A (Technical Area Unit Descriptions), Permit Attachment B (Part A Application), and Permit Attachment C (Waste Analysis Plan) include information regarding waste management procedures and hazardous waste constituents stored at the permitted unit.

2.1 Permitted Unit Domes

The four storage domes at the permitted unit have been used for the storage of hazardous waste in both liquid and solid form since 1994. The domes (an aluminum framework of trusses covered with tension-fitted ultraviolet resistant, fire-retardant coated, polyester fabric) are 246 feet long by 89 feet wide and cover a surface area of approximately 20,400 square feet each. The base of each dome is secured with anchor bolts to a concrete ring wall that surrounds the interior floor perimeter and provides run-on and

Document: LANL Class 1 Permit Modification

Pate: February 2014

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

Kimberly Davis Lebak

Manager, Los Alamos Field Office

National Nuclear Security Administration

U.S. Department of Energy

Owner/Operator





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FEB 2 7 2014

Date:

Symbol: ENV-DO-14-0023
LAUR: 13-29 NMED

Mr. John E. Kieling Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505

Dear Mr. Kieling:

Subject:

Transmittal of Class 1 Permit Modification to Update Figures in the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, EPA ID No. NM0890010515

The purpose of this letter is to submit a Class 1 permit modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit issued to the Department of Energy and Los Alamos National Security, LLC (DOE/LANS) in November 2010. The permit modification provides revisions to figures in Permit Attachments N and G and updates that are related to figure changes in Permit Attachments A, G and J.

The proposed modifications have been prepared in accordance with the Code of Federal Regulations [CFR], Title 40 (40 CFR) § 270.42(a). This Class 1 permit modification consists solely of administrative changes in accordance with 40 CFR § 270.42, Appendix I, Item A.1 and Permit Section 3.1(3).

This permit modification package includes this transmittal letter and an enclosure with a description of changes; pages of the revised portions of Attachments A, G, and J; as well as replacement figures for both Attachments N and G of the Permit (LA-UR-13-29257). Accordingly, a signed certification page has also been included.

Included herein are three hard copies and one electronic copy of this submittal. The hardcopy submittal contains pages or sections where text has been changed rather than copies of the entire

