



ESHID-602017

Environmental Protection & Compliance Division
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Date: **NOV 28 2016**
Symbol: EPC-DO-16-352
LA-UR: 16-28796
Locates Action No.: N/A

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 add a Restroom Trailer at TA-54, Pad 11 to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, EPA ID No. NM0890010515

The purpose of this letter 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 (Permit). The Permit was issued to the Department of Energy and Los Alamos National Security, LLC (DOE/LANS), the Permittees, in November 2010. The permit modification provides revisions to figures in Permit Attachments N and G.12 and updates text related to figure changes in Permit Attachments A and G.12.

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, Items A.1 and Permit Section 3.1(3). Permit Section 3.1(3) requires that all figures accurately reflect the location of all buildings and structures, regardless of whether they manage hazardous waste. This modification adds a Restroom Trailer at TA (TA) 54, Pad 11 that will not be used to manage hazardous waste.

This permit modification package includes this transmittal letter and an enclosure with a description of changes, including replacement figures and pages of the revised text in Attachments A and G.12. Accordingly, a signed certification page has also been provided.

Three hard copies and one electronic copy of this submittal will be delivered to the NMED-HWB. The hardcopy submittal contains pages or sections where text has been changed rather than copies of full attachments of the Permit. The electronic copy that will only be distributed to NMED-HWB 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 NMED-HWB-maintained LANL facility mailing list in accordance with 40 CFR § 270.42(a)(1)(ii) within ninety days of the transmittal of this permit modification request.

If you have comments or questions regarding this permit modification, please contact David S. Rhodes, EM-LA, at (505) 665-5325 or Mark P. Haagenstad, LANS, at (505) 665-2014.

Sincerely,



John C. Bretzke
Division Leader
Environmental Protection & Compliance Division
Los Alamos National Security LLC

Sincerely,



David S. Rhodes
Director, Office of Quality & Regulatory Compliance
Environmental Management
Los Alamos Field Office

JCB:DSR:MPH:AME/lm

Enclosures: (1) Class 1 Permit Modification to add a Restroom Trailer at TA-54, Pad 11

Cy: Laurie King, USEPA/Region 6, Dallas, TX (E-File)
Dave Cobrain, NMED/HWB, Santa Fe, NM, (E-File)
Neelam Dhawan, NMED-HWB, Santa Fe, NM, (E-File)
Siona Briley, NMED-HWB, Santa Fe, NM (E-File)
Karen E. Armijo, NA-LA, (E-File)
Kirsten M. Laskey, EM-LA, (E-File)
Jody M. Pugh, NA-LA, (E-File)
David S. Rhodes, EM-LA, (E-File)
David J. Nickless, EM-LA, (E-File)
Craig S. Leasure, PADOPS, (E-File)
William R. Mairson, PADOPS, (E-File)
Michael T. Brandt, ADESH, (E-File)
Raeanna Sharp-Geiger, ADESH, (E-File)
David J. Funk, ADEM, (E-File)
Leslie Sonnenberg, EWMO-DO, (E-File)
Paul N. Newberry, WD-SRS (E-File)

Cy (continued):

Mark P. Haagenstad, EPC-CP, (E-File)

Angela M. Edwards, EPC-CP, (E-File)

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ENCLOSURE 1

**Class 1 Permit Modification to Add a Restroom Trailer at
TA-54, Pad 11**

EPC-DO-16-352

LA-UR-16-28796

Date: NOV 28 2016

Class 1 Permit Modification to Add Restroom Trailer

This document contains 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, (LANS) collectively known as the Permittees, in November 2010. All proposed changes are shown in red text for Permit Attachments A and G.12. These changes as well as the replacement figures for Attachments N and G.12 are included in this enclosure. Attachment J of the Permit was not revised because the trailer is not used for management of hazardous waste.

Permit Modification Summary

The purpose of this permit modification submittal is to add a restroom trailer to Technical Area (TA)-54, Pad 11.

Basis

This Class 1 permit modification notification is being submitted in accordance with Permit Section 3.1(3) and 40 CFR 270.42, Appendix I, Item A.1. As stated in Permit Section 3.1(3), the changes included in this permit modification shall be reflected in Attachment N and in the closure plan in Attachment G.12. In addition, changes to the text regarding the restroom trailer addition are shown in Permit Attachment A and Attachment G.12.

Permit Changes

Permit Attachment A

Attachment A, Section A.4.2.9, *Pad 11* (page 23), was modified to reflect the addition of a restroom trailer.

Permit Attachment G

Attachment G.12, Section 2.0, *Description of Unit to be Closed* (page 1), was modified to reflect the addition of a restroom trailer.

Permit Figures in Attachments G and N

Figure 36, *TA-54, Area G, Pad 11* and Figure G.12, *Technical Area 54, Area G, Pad 11 Outdoor Closure Plan*, were revised to reflect the location of the restroom trailer.

Attachment 1

Text revisions for Attachments A and G.12 and replacement figures for Attachments N and G.12

ATTACHMENT A
TECHNICAL AREA (TA) - UNIT DESCRIPTIONS

equipped with a badge reader and is locked at all times unless used by authorized personnel for maintenance purposes.

A.4.2.9 Pad 11

This asphalt pad is approximately 4 inches thick, measures approximately 478 ft long by 137 ft wide, and is sloped approximately 1 to 2% to the southeast. Storage dome 375 is located on the western portion of pad 11 and is used for storage of hazardous, mixed low level, and mixed transuranic waste. It measures approximately 300 ft long by 100 ft wide (*see Figure 36 in Attachment N (Figures)*). The building is an aluminum A-frame truss design that is anchored to a concrete ring wall. The dome is of modular construction utilizing a membrane or fabric covering. It is equipped with 14 personnel doors and two roll-up doors, one each at the east and west ends of the building. Ramped entrances allow for safe movement of container handling equipment and vehicle access. Dome 375 contains a modular panel containment structure (approximately 120 feet long x 60 feet wide) used for size reduction, decontamination, segregation, waste assay, reclassification activities, and repackaging of transuranic waste prior to shipment offsite. Dome 375 also contains four structures that serve as an office area, a control area, and rooms for donning and doffing anti-contamination clothing. These structures are support structures and will not be used to store hazardous waste. Dome 375 also has two additional structures (124B and 124 C). The external dimensions of the structures are approximately 20 feet long, 8 feet wide and 8.5 feet high. The structures are refrigeration units, electrically driven and are constructed of stainless steel internal and external panels. The structures are connected to the roll-up door opening for the modular containment structure, with the doors for each of the units facing into the modular containment structure. There is a restroom trailer (approximately 15 feet long x 8.5 feet wide) on the south eastern portion of Pad 11.

A.4.3 TA-54 West

The two permitted units at TA-54 West include the indoor low bay and the high bay at TA-54-38 and the outdoor storage pad which surrounds the north, east, and south sides of TA-54-38 and the loading dock at TA-54-38. The permitted units at TA-54 West are used to store solid mixed low level and mixed transuranic waste (*see Figure 37 in Attachment N (Figures)*).

The permitted units at TA-54-38 West may receive any container that may be stored at the units in accordance with Permit Section 3.3 (e.g. 85-gallon drums, 100-gallon drums, and ten-drum overpacks); however, most often the units receive WIPP-ready 55-gallon drums and SWBs for final preparation and packaging. All waste containers are handled in a manner that will not cause them to rupture.

Waste is generally brought into the TA-54-38 West Outdoor Pad through the south-eastern vehicle gate and placed in storage on the northern portion of the TA-54-38 West Outdoor Pad. At the outdoor unit, waste is not stored in front of gates or within 10 feet of the fence line or within 60 feet of the building. No paved or unpaved roadways are located within 5 feet of the waste storage area. From the outdoor permitted unit, containers are generally moved into the Low Bay at TA-54-38 West and made amenable for placement in a WIPP-compliant shipping container. Normal operations for making the individual waste containers ready for shipment

ATTACHMENT G.12
TECHNICAL AREA 54, AREA G, PAD 11
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 11 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.

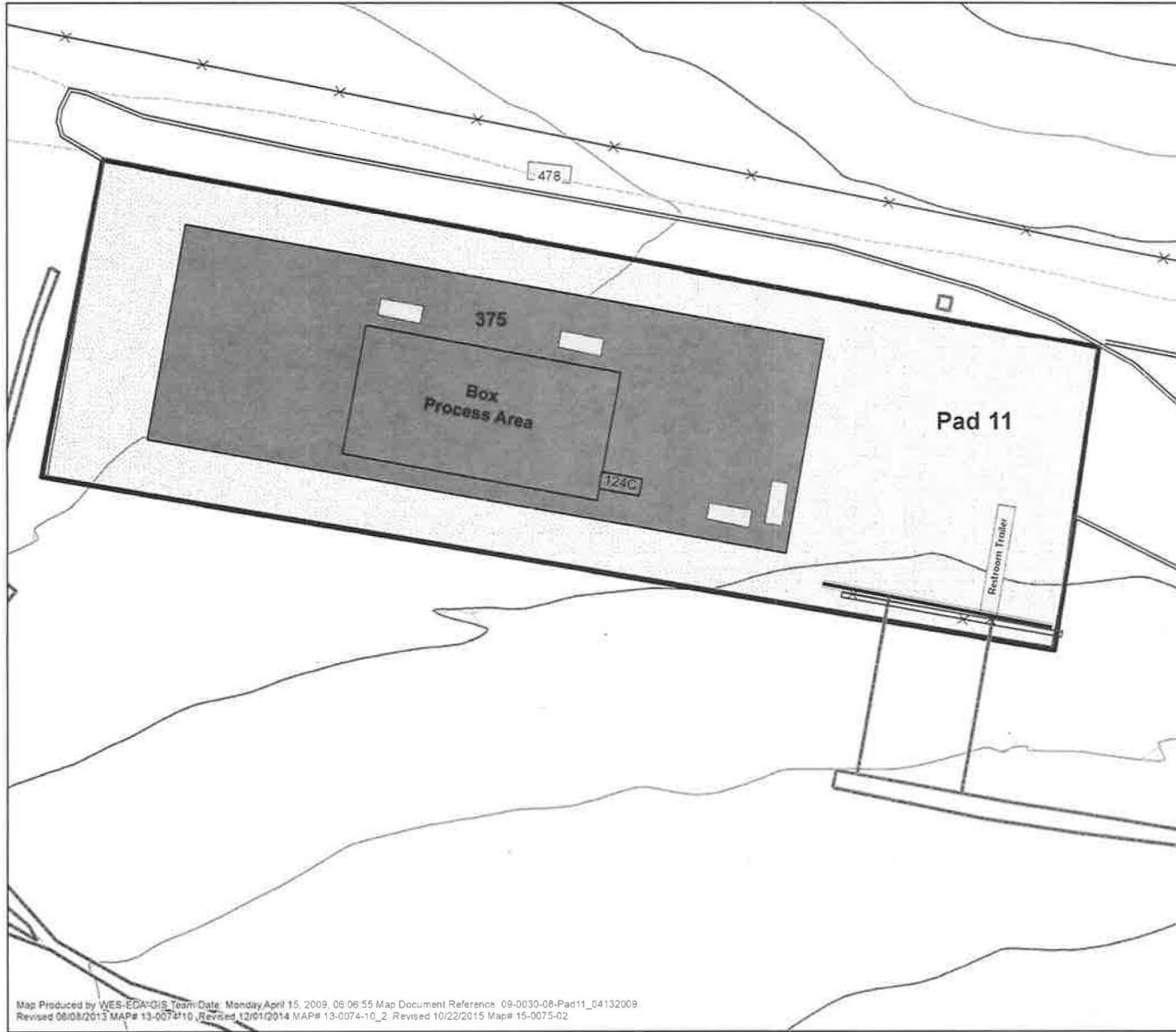
2.0 DESCRIPTION OF UNIT TO BE CLOSED

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

The permitted unit, which was constructed in 1998, is located in the western portion of Area G and consists of an asphalt pad that measures 478 feet long and 137 feet wide or approximately 65,500 square feet. It consists of four inches of asphalt built over underlying base course which overlies a minimum of six inches of tuff fill. It also has a dome (Dome 375).

The permitted unit is sloped from 1% to 2% to the south/southeast for drainage and has curbing on the south and east sides as well. Drainage is directed to a series of four 5 inch-wide by 27 foot-long drains, all connected to two underground 8-inch diameter polyvinyl chloride pipes which discharge to a concrete lined ditch located near the southeast corner of the pad.

The permitted unit stores hazardous waste in both liquid and solid form in Dome 375. The dome, which is an aluminum framework of trusses covered with tension-fitted ultraviolet resistant, fire-retardant coated, polyester fabric, is 300 feet long by 100 feet wide and covers a surface area of approximately 30,000 square feet. It is anchored with anchor bolts to the interior concrete ring wall and is equipped with two double-panel rolling doors, one at the east end of the dome and the other on the west end. It also has 14 personnel doors located approximately every 31 to 57 feet along the dome's length. These doors allow for adequate access both by vehicles and by personnel. The interior perimeter of the dome is surrounded by a concrete ring wall, which helps prevent run-on into and runoff from the dome. Asphalt ramps located at the vehicle entrances allow vehicles and container handling equipment to pass safely over the curb. Dome 375 contains a modular panel containment structure (approximately 120 feet long x 60 feet wide) used for size reduction, decontamination, segregation, waste assay, reclassification activities, and repackaging of transuranic waste prior to shipment offsite. Two structures (124B and 124 C) are connected to the modular panel containment structure. The external dimensions of the structures are approximately 20 feet long, 8 feet wide and 8.5 feet high. The structures are refrigeration units, electrically driven, and are constructed of stainless steel internal and external panels. The structures are connected to the roll-up door opening for the modular containment structure, with the doors for each of the units facing into the modular containment structure. There is a restroom trailer (approximately 15 feet long x 8.5 feet wide) on the south eastern portion of Pad 11.



Permitted Unit Soil Sampling Grid

Legend

Buildings/Structures
(not associated with the permitted unit)

RCRA Waste Management Units (RWMU)
Category

RWMU Structure

Drain Lines

Drain

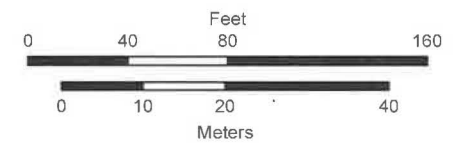
Contours, 20 ft

Roads, paved

Roads, dirt

Fences

1:650



State Plane Coordinate System New Mexico, Central Zone, US Feet
NAD 1983 Datum

Map Produced by WES-EDA GIS Team Date: Monday April 15, 2009, 06:06:55 Map Document Reference: 09-0030-08-Pad11_04132009
Revised 08/08/2013 MAP# 13-007410, Revised 12/01/2014 MAP# 13-0074-10_2 Revised 10/22/2015 Map# 15-0075-02

DISCLAIMER This map was created for work processes associated with the LANL Hazardous Waste Facility Permit. All other uses for this map should be confirmed with the LANL, ENV Division, Water Quality & RCRA

Figure 36: Technical Area (TA)- 54, Area G, Pad 11

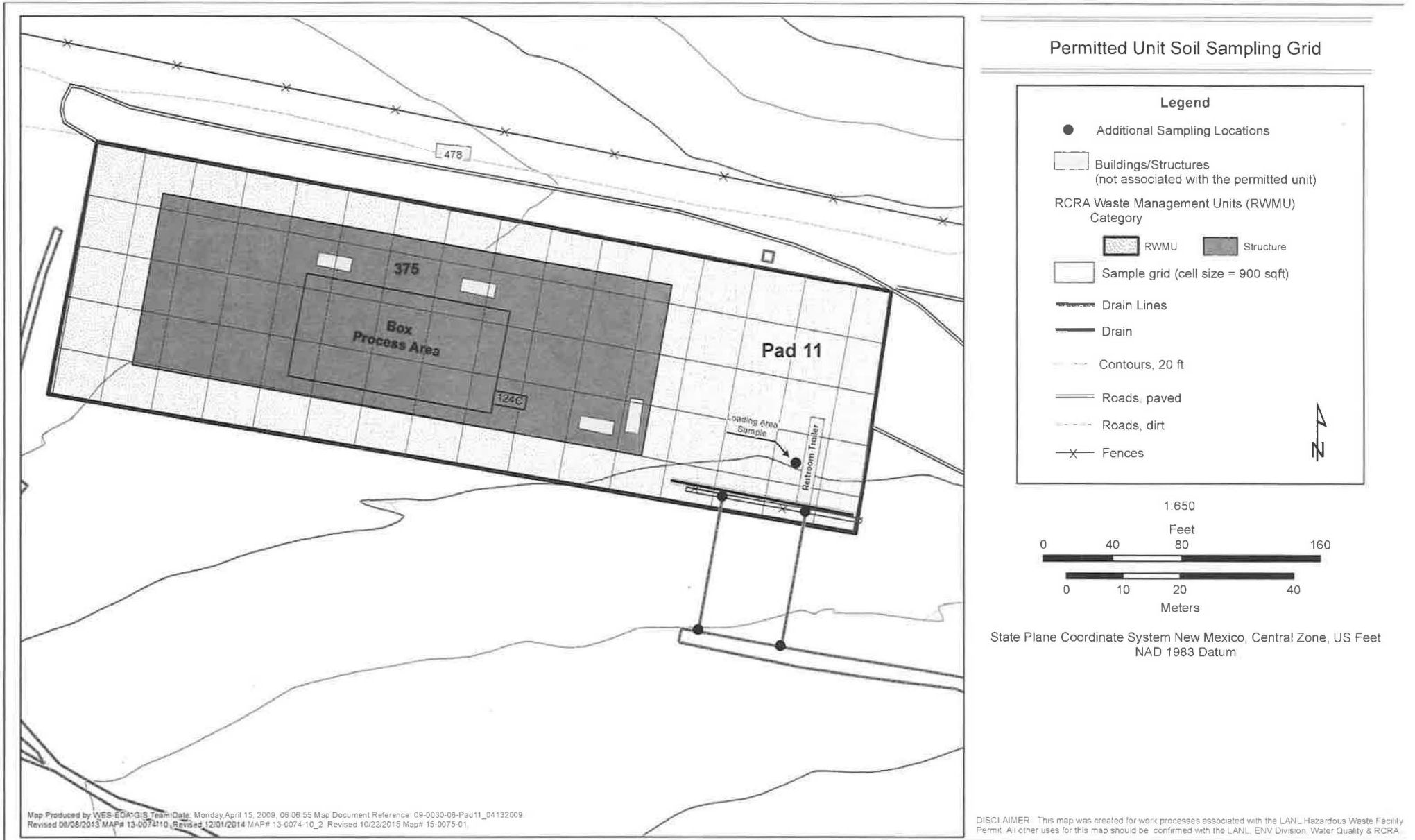


Figure G.12-1: Technical Area 54, Area G, Pad 11 Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations

Document: LANL Class 1 Permit Mod
Date: November 2016

Attachment 2
Certification

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.



John C. Bretzke

Division Leader

Environmental Protection and Compliance Division

Los Alamos National Security, LLC

11-17-16

Date Signed



David S. Rhodes

Director, Office of Quality & Regulatory Compliance

Environmental Management Los Alamos Field Office

U.S. Department of Energy

11-22-2016

Date Signed