



U.S. DEPARTMENT OF
ENERGY

ESHID-603802

National Nuclear Security Administration

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Environmental Management

Los Alamos Field Office
1200 Trinity Drive, Suite 400P
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Date: November 27, 2023

Mr. Ricardo Maestas, Acting Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6313

Subject: Class 1 Permit Modification to Update Contact Information and Upgrade Emergency Equipment in the Los Alamos National Laboratory Hazardous Waste Facility Permit

Dear Mr. Maestas:

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), EPA ID# NM0890010515. The Permit authorizes the United States Department of Energy (DOE) National Nuclear Security Administration-Los Alamos Field Office (NA-LA); the DOE Environmental Management-Los Alamos Field Office (EM-LA); Triad National Security, LLC (Triad); and Newport News Nuclear BWXT-Los Alamos, LLC (N3B), collectively the Permittees, to manage, store, and treat hazardous waste at LANL. This permit modification provides changes to Permit Attachment D, *Contingency Plan*, and includes updates to the contact information for the Primary and Alternate Incident Response Commanders as well as updates to emergency equipment. The Incident Response Commander is identified as the functional equivalent of the Emergency Coordinator described in Title 40 of the Code of Federal Regulations (40 CFR) § 264.55. This permit modification also provides changes to Permit Attachment A, *Technical Area (TA) – Unit Descriptions*, to ensure consistency between Attachment A and the emergency equipment updates in Attachment D.

The Permittees prepared this permit modification in accordance with 40 CFR § 270.42(a)(1). The changes made to the Permit under this modification fall under the conditions of 40 CFR § 270.42, Appendix I, Items B.6.b and B.6.d for a Class 1 permit modification that does not require prior approval. A full description of the permit modification, the rationale for the classification type, proposed changes to Permit Attachments A and D, and a signed certification are included in the enclosure to this letter.

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 the entire Attachment D. The electronic copy, provided only to the 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.

Notice of this permit 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 NMED-HWB incorporating the changes.

If you have any questions for Triad or NA-LA, please contact Jason Hill (Triad) at (505) 551-2218, jshill@lanl.gov or Robert Gallegos (NA-LA) at (505) 901-3824, robert.gallegos@nnsa.doe.gov.

If you have any questions for N3B or EM-LA, please contact Christian Maupin (N3B) at (505) 695-4281, christian.maupin@em-la.doe.gov or Arturo Duran (EM-LA) at (575) 373-5966, arturo.duran@em.doe.gov.

Sincerely,

**Robert A.
Gallegos**

Digitally signed by Robert A.
Gallegos
Date: 2023.11.22 08:52:53
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Robert A. Gallegos
Program Manager
Environmental Permitting and Compliance Programs
National Nuclear Security Administration
Los Alamos Field Office
U.S. Department of Energy

Sincerely,



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HARCEK
Date: 2023.11.07 13:06:39
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Brian Harcek
Acting Co-Director
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office
U.S. Department of Energy

Enclosure: 1) *Class 1 Permit Modification to Update Contact Information and Upgrade Emergency Equipment in the Los Alamos National Laboratory Hazardous Waste Facility Permit*

Copy w/enclosures:

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Dear Mr. Maestas:

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The Permittees prepared this permit modification in accordance with 40 CFR § 270.42(a)(1). The changes made to the Permit under this modification fall under the conditions of 40 CFR § 270.42, Appendix I, Items B.6.b and B.6.d for a Class 1 permit modification that does not require prior approval. A full description of the permit modification, the rationale for the classification type, proposed changes to Permit Attachments A and D, and a signed certification are included in the enclosure to this letter.

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ENCLOSURE 1

*Class 1 Permit Modification to Update Contact Information
and Upgrade Emergency Equipment in the Los Alamos
National Laboratory Hazardous Waste Facility Permit*

*Los Alamos National Laboratory,
EPA ID# NM0890010515*

EPC-DO-23-322
LA-UR-23-31807

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



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Class 1 Permit Modification to Update Contact Information and Upgrade Emergency Equipment in the Los Alamos National Laboratory Hazardous Waste Facility Permit

This document contains a Class 1 permit modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit), EPA ID# NM0890010515. The United States Department of Energy (DOE) National Nuclear Security Administration-Los Alamos Field Office (NA-LA); the DOE Environmental Management-Los Alamos Field Office (EM-LA); Triad National Security, LLC (Triad); and Newport News Nuclear BWXT-Los Alamos, LLC (N3B) provide the Permit modification herein.

Attachment 1 of this permit modification provides updated contact information in Permit Attachment D, *Contingency Plan*, Section D.1.1. Attachment 1 additionally provides updates to the TA-54 Communication Equipment in 1) Permit Attachment D, *Contingency Plan*, TA-54 Area L Table D-1 and TA-54 Area G Table D-2 and 2) Permit Attachment A, *Technical Area (TA) – Unit Descriptions*, Section A.4.5. Attachment 2 includes a certification page, prepared in accordance with the requirements of Title 40 of the Code of Federal Regulations (40 CFR) § 270.11.

BASIS

This permit modification has been prepared in accordance with 40 CFR § 270.42 (a)(1) and provides changes to Permit Attachment D, Section D.1.1, TA-54 Area L Table D-1, and TA-54 Area G Table D-2 and Permit Attachment A, Section A.4.5. The changes meet the conditions specified in 40 CFR § 270.42, Appendix I, Item B.6.b (replacement with functionally equivalent equipment, upgrade, or relocate emergency equipment listed) and 40 CFR § 270.42, Appendix I, Item B.6.d (changes in name, address, or phone number of coordinators or other persons or agencies identified in the plan) for a Class 1 permit modification that does not require prior approval.

DESCRIPTION

Contact information for the Primary and Alternate Incident Response Commanders has been updated in Permit Attachment D, Section D.1.1. All changes are identified in Attachment 1 using underlined, red text for additions and redline strikeout for deletions.

The emergency evacuation loud-speaker system at TA-54 Areas L and G are obsolete. After recent testing, they are difficult to hear and therefore no longer serve their intended purpose. TA-54 personnel are required to carry cell phones and/or two-way radios when performing work in Areas G and L. This communication equipment is already identified in Attachment A, Section A.4.5 and Attachment D, TA-54 Area L, Table D-1 and TA-54 Area G, Table D-2. The phones and two-way radios are functionally equivalent to the emergency evacuation loud-speaker system and are an upgrade as they are more efficient and reliable in the event of an emergency. Attachment A, Section A.4.5 and Attachment D, TA-54 Area L, Table D-1 and TA-54 Area G, Table D-2 have been updated to identify that cell phones and two-way radios are the primary emergency communication equipment utilized in TA-54 Areas G and L. Additionally, when activated, push buttons at TA-54 Area G activate the emergency evacuation loud-speaker system. Because cell phones and two-way radios will be the primary emergency communication equipment, the push buttons are obsolete and no longer serve their intended purpose. The phones and two-way radios are functionally equivalent to the push buttons and are an upgrade as they are more efficient and reliable in the event of an emergency. Other changes made in Attachment A, Section A.4.5 were to ensure consistency between Attachment A and the equipment listed in Tables D-1 and D-2 in Attachment D. All changes are identified in Attachment 1 using underlined, red text for additions and redline strikeout for deletions.

Attachment 1

Changes to the Los Alamos National Laboratory Hazardous Waste Facility Permit, Attachments A and D

Los Alamos National Laboratory, EPA ID# NM0890010515

ATTACHMENT A
TECHNICAL AREA (TA) - UNIT DESCRIPTIONS

working hours. Access to any part of TA-54 before or after normal working hours or on weekends requires approval of the appropriate Group Leader or Facility Manager at TA-54. TA-54 is patrolled by security personnel during non-operational hours to ensure that the gates are locked and that unauthorized entry has not occurred. Anyone entering the fenced Area L and Area G waste management areas from the TA-54 administrative area is “badged in” before proceeding. Badging in is the process of identifying the person, assessing his or her security and training status using DOE security badges, and determining the need for an escort. Authorized personnel may enter the fenced portions of Areas L and G only after negotiating additional access controls in the form of walk-through turnstiles and motorized vehicle gates. Each turnstile and vehicle gate is equipped with a badge reader to ensure authorized access only. Resident personnel are required to badge in upon arrival and prior to leaving TA-54. Non-resident personnel and visitors are required to badge or sign in and out at an access control point at the facility operations center. Depending on their level of training, non-resident personnel may be required to be escorted in order to access TA-54 Areas L and G and TA-54 West. Access to the Area L, Area G, and TA-54 West permitted units requires additional controls. Bilingual (*i.e.*, English and Spanish) warning signs are posted on the fence at 50- to 75-ft intervals, are legible from a distance of 25 ft, and can be seen from any approach to this area. The legends on the signs indicate "Danger—Hazardous Waste Storage Area" and "Unauthorized Persons Keep Out." The security fence is inspected by on-site personnel and repairs are made as necessary. The locations of the security fence, entry gates, and entry stations are shown on Figures 7, 8, and 9, in Attachment N (*Figures*).

A.4.5 Emergency Equipment

Emergency equipment is located throughout TA-54 and includes internal communications, alarm systems, fire alarms, spill kits, and decontamination equipment. ~~Area L is equipped with an audible alarm system to alert personnel of a fire or the need to evacuate the area. These alarms can be activated by pulling a fire alarm or by pushing the evacuation alarm button.~~ The fire alarm pull boxes are located in Dome 215 and are connected to the Los Alamos Fire Department (LAFD) through the Facility’s central alarm system at all times. ~~Evacuation alarms are located adjacent to the fence line crash gates and other locations in Area L (see Attachment D, Table D-1).~~ ~~Alphanumeric pagers, C~~ellular telephones, and/or two-way radios are also distributed to workers at Area L. Employees can be notified of an emergency situation and appropriate response actions through the use of a text message sent on ~~the emergency alphanumeric pagers, or~~ cellular telephones, or by two-way radio. The emergency paging notification system can be utilized to alert workers of an emergency situation as well as appropriate response actions. ~~Emergency paging telephones are also available at the facility so that information can be announced throughout the area and personnel can contact onsite and facility emergency personnel at all times.~~ Windsocks are also located at strategic locations to indicate wind direction and strength. Fire control equipment at Area L includes fire extinguishers (*e.g.*, ABC-rated, water, carbon dioxide, dry chemical), a dry-pipe sprinkler system, and dry chemical systems. The fire extinguishers are available at or near most structures within Area L for use by on-site personnel depending on the size and fuel source of a fire. Dome 215 has an automatic dry-pipe sprinkler system that is heat activated in the event of a fire. Storage sheds 68, 69, and 70 have dry chemical systems. Fire hydrants are located near TA-54-37 and the southeast corner of TA-54-62. Personal decontamination equipment at Area L includes emergency eyewash stations and showers. This equipment is for use by

personnel in emergencies involving chemical or radiological materials. These stations are generally located near or inside structures where waste is being handled. Emergency shower and eyewash stations are located at or near TA-54-39, TA-54-31, and TA-54-215. Waste characterization documentation and SDS are also available in the event of a chemical exposure. There are several spill kits available at Area L to mitigate small containable spills. These kits typically contain sorbents, neutralizers, PPE, and other equipment essential for containment of small spills. In addition to the spill kits, shovels for cleanup are stored in TA-54-46. Oversized drums and sorbents are also stored at various locations throughout Area L. For larger spills or other unusual hazardous situations, a variety of equipment is available to emergency personnel. This equipment includes forklifts, self-propelled loaders, and other heavy equipment from Area G.

~~Area G is equipped with an audible alarm system to alert personnel of a fire or the need to evacuate the area. The alarms can be activated by pulling a fire alarm or by pushing the evacuation alarm button.~~ Fire alarms ~~and evacuation alarms~~ are in place at strategic locations to alert personnel of emergency conditions. The fire alarms are located throughout Area G and are connected to the LAFD through the Facility's central alarm system at all times. Flame or smoke detection equipment is located within structures TA-54-229, TA-54-230, TA-54-231, and TA-54-232. Security personnel and LAFD are notified upon activation of the flame or smoke detectors. Fire control equipment is located throughout Area G. This equipment includes ABC-rated or BC-rated fire extinguishers, dry-chemical fire suppression systems, and several fire hydrants. Trained personnel can use the fire extinguishers to extinguish small, non-chemical fires. For larger fires, security personnel and the LAFD are alerted. Personnel working in Area G carry ~~alphanumeric pagers~~, cellular phones, or two-way radios as the main form of communication. ~~Emergency paging telephones are in place so that information can be announced throughout the area.~~ This equipment ensures that personnel can contact on-site and Facility emergency personnel at all times. Windsocks are at strategic locations to indicate wind direction and strength. PPE and emergency equipment supplies are stored at various locations throughout Area G. There are different types of monitoring equipment located at the Area G CSUs that are used to qualitatively and quantitatively evaluate airborne contaminants. Alarms and strobe lights warn personnel when airborne concentrations exceed preset limits. They are for use by personnel in emergencies involving chemical or radiological materials. Waste characterization documentation and SDS are available in the event of a chemical exposure. First aid equipment can be used to treat injuries until trained medical personnel arrive at the scene. Spill control equipment is maintained at various structures within Area G. Trained personnel use this equipment to mitigate small, containable spills if they know what has been spilled and are sure their actions will not put themselves or others at risk. PPE is also maintained at various structures within Area G and is available for use during routine and non-routine operations to protect personnel from exposure to chemical and radiological contaminants. Warning tapes and barricades are used to post areas and prevent unauthorized entry into restricted areas. Heavy equipment is also available at Area G to move heavy objects.

TA-54-38 at TA-54 West is equipped with separate local alarm systems to alert personnel of fire or the need to evacuate the area. Fire alarm pull stations are located throughout the building and can be activated in the event of an emergency. The alarm system can also be activated by using evacuation alarm buttons located near the entrances to the building. Upon

ATTACHMENT D
CONTINGENCY PLAN

4. The IC (*e.g.*, Incident Response Commander) coordinates all groups and agencies responding to the emergency and personnel operating at the scene using the ICS. The General Hazardous Waste Emergency Notification System, illustrated on Figure D-1, is designed to expand and contract, as appropriate, to include the response groups/agencies needed to address any particular emergency. The EOSC provides notification to on-site and off-site groups and agencies for both response requests and information.

5. The IC may appoint and utilize a network of support personnel to assess, plan for, and mitigate emergencies. These personnel can include, but are not limited to, a Safety Officer, a Public Information Officer, and a Liaison Officer that report directly to the IC and are responsible for issues related to safety, information, and the interaction of various groups associated with the overall emergency. Also reporting directly to the IC are an Operations Section Chief, Logistics Section Chief, Planning Section Chief, and an Administrative Section Chief. The Operations Section Chief oversees the Fire Branch, the Emergency Medical Services Branch, and the emergency response organization, and is responsible for mitigating the emergency response. The Logistics Section Chief is responsible for providing support personnel and equipment necessary for the emergency response. The Planning Section Chief is responsible for planning the mitigation and recovery activities for the emergency. The Administrative Section Chief is responsible for keeping records of expenditures. These ICS positions are listed in Figure D-1. The appropriate ICS positions will be activated as the emergency warrants. During an emergency at the Facility, assistance may be provided to the IC and the IC's appointees by a large variety of response groups/agencies. The responsibilities and/or assistance available from the various response groups/agencies are discussed briefly in Attachment Sections D.1.2 through D.1.7 and the appropriate representatives will be contacted during an emergency as appropriate.

6. The Permittees shall provide a copy of this Contingency Plan and any revisions to each of the emergency response groups/agencies (including the LAPD, LAFD, LAMC, and the State of New Mexico's Department of Homeland Security and Emergency Management (DHSEM) Area 3 Emergency Management Coordinator).

D.1.1 Emergency Management

1. The Permittees shall delegate the authority and responsibility for administering and implementing the Facility's emergency management program to the emergency management organization. Emergency management personnel shall coordinate and issue the Facility's Los Alamos National Laboratory and Los Alamos Field Office Hazardous Materials Program Plan; emergency management personnel provide response coordination for emergencies. Emergency management personnel provide a 24-hour EOSC for the Facility and a 24-hour Incident Response Commander to respond to emergencies, including hazardous and mixed waste releases. The Incident Response Commander is the functional equivalent of the Emergency Coordinator (40 CFR § 264.55). The emergency management organization 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 mobile EOC is equipped and ready for

immediate deployment. Should an EOC be activated during an emergency, additional emergency personnel can be requested by the IC through the EOOSC.

2. Assignment as the Incident Response Commander is rotated. The Incident Response Commander can be reached 24 hours a day by contacting the EOOSC at 505-667-2400.

3. The Incident Response Commander 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 Incident Response Commander 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 Incident Response Commander 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 Incident Response Commander responding to an emergency shall have access to various tools to include Emergency Actions Levels with prescribed protective actions and ChemLog with a current chemical inventory of the appropriate building(s) in the area in which the incident is occurring. Access to these tools shall be maintained at the facility and made available to the Incident Response Commander and other emergency response members at the EOC. Additionally, this information may be gained from the facility manager where a waste management unit is located. The various response groups shall obtain specific information, if necessary, 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 other site-specific information.

5. The Permittees shall ensure that the names, addresses, and telephone numbers listed below are the current Primary and Alternate Incident Response Commanders.

Primary:

Aaron Brick
11 Don Bernardo
Santa Fe, NM 87506
(W) 505-667-2400
(C) 505-695-8824~~Ted Ulibarri~~
County Road 88
Santa Fe, NM 87506
(W) 505-667-3463
(C) 505-412-8737

Alternates:

~~Aaron Brick~~
~~11 Don Bernardo~~
~~Santa Fe, NM 87506~~
~~(W) 505-667-2400~~
~~(C) 505-695-8824~~

J. Ted Collins (Ted)
3230 ~~Nizhone~~-Nizhoni
Santa Fe, NM 87507
(W) 505-606-9730
(C) 505-695-3004
(H) 505-309-2761

Robert Thornton III
120 Beryl Street
White Rock NM, 87547
(C) 505-690-4745
(H) 505-389-8334

6. To assure timely notifications and immediate response during an emergency, the Permittees shall ensure that the telephone numbers 911 or 505-667-2400 are contacted to obtain the on-call Incident Response Commander.

D.1.2 Hazardous Materials Response

1. Hazardous Materials (HAZMAT) personnel are responsible for the aggressive mitigation of chemical, radiological, hazardous waste, and mixed waste emergencies, including field decontamination of responders and response equipment. At the request of the IC, the HAZMAT personnel may provide limited field decontamination support for victims. HAZMAT personnel are capable of providing a decontamination station at the scene of a hazardous material incident to process people working in a contaminated area and is prepared to perform decontamination of personnel. HAZMAT personnel shall meet the training criteria for emergency response personnel specified in the Code of Federal Regulations, Title 29, §1910.120(q)(6)(iii), (iv), and (v). HAZMAT personnel act as part of the ICS reporting directly to IC, or the Operations Section Chief if the position is staffed.

2. During an emergency response, the HAZMAT personnel may also provide site field monitoring to determine the nature and extent of contamination, provide information on correct

TABLE D-1
TA-54 AREA L
Emergency Equipment

FIRE CONTROL EQUIPMENT

Class ABC and BC rated fire extinguishers are located at Area L. Class D rated fire extinguishers are available at Area L if combustible metals are being managed. A dry-pipe sprinkler system is located at TA-54-215.

Dry chemical fire-suppression systems are located in storage sheds TA-54-68, TA-54-69, and TA-54-70.

Description of General Capabilities:

Fire extinguishers may be used by any qualified employee in the event of a small fire. The automatic dry-pipe sprinkler system is heat activated. Emergency Operations Support Center (EOSC) and the Los Alamos Fire Department (LAFD) are alerted when this system has been activated.

Fire alarm pull boxes are located inside TA-54-37, TA-54-39, TA-54-51, TA-54-60, TA-54-117, TA-54-210, and TA-54-221.

Description of General Capabilities:

Fire alarms may be activated by any employee in the event of a fire to notify the LAFD and the Emergency Operations Support Center (EOSC).

Fire hydrants are located near the main site entrance to Area L and at the southeast corner of TA-54-62 inside Area L. These fire hydrants supply water at an adequate volume and pressure to satisfy 40 CFR § 264.32(d).

Freeze-proof faucets are located east of TA-54-31.

SPILL CONTROL EQUIPMENT

Spill equipment at TA-54 Area L includes the following:

- Shovels
- Oversized drums
- Absorbent (various locations on site)
- Heavy equipment from Area G available for any emergencies at Area L

Spill kits are located throughout Area L. Each kit includes bags of absorbent, caustic neutralizer, acid neutralizer, and an inventory of tools and supplies.

COMMUNICATION EQUIPMENT

Cellular telephones with text capabilities and/or two-way radios are given to employees working in the area and are the primary emergency communication equipment for Area L. Personnel will carry cellular telephones or two-way radios or will have immediate access to communication equipment through visual or voice contact with another employee.

A fire alarm pull box is located at TA-54-215.

~~Emergency alarm system loud speakers are located throughout the site. Evacuation alarms are located adjacent to the fence line crash gates at Area L, at the northeast end of TA-54-32, the exterior west end of TA-54-215 and at TA-54-62.~~

Description of General Capabilities:

External and internal Laboratory communications which may be used in emergency situations are listed.

Fire alarm may be activated by any employee in the event of a fire to notify the LAFD and security personnel.

Employees can be notified of an emergency situation and appropriate response actions through the use of a text message sent on cellular telephones with text capabilities.

~~The evacuation alarm is a pulsating sound that can be heard throughout Area L.~~ The fire alarm is a double slow-whoop sound.

The emergency notification system can be utilized to alert workers of an emergency situation as well as appropriate response actions.

DECONTAMINATION EQUIPMENT

Emergency shower and eyewash stations are located immediately east of TA-54-31, at TA-54-215, at TA-54-39, and outside TA-54-39.

Safety Data Sheets (SDSs) are available hard copy or via online database at the facility.

Description of General Capabilities:

Emergency shower and eyewash stations are used by personnel who receive a chemical splash to the skin or eyes. Specific SDSs for the chemical(s) should be obtained prior to working with the chemical to determine if the application of water is indicated for decontamination.

PERSONAL PROTECTIVE EQUIPMENT

Personnel at Area L are required to use appropriate personal protective equipment (PPE) to protect themselves from the hazards found in the workplace under normal conditions. This PPE may include gloves, steel-toed shoes, and safety glasses. Additional PPE may be required during an unusual hazardous situation or during sampling activities.

TABLE D-2
TA-54 AREA G
Emergency Equipment

FIRE CONTROL EQUIPMENT

ABC and/or BC rated fire extinguishers are available at TA-54-8, TA-54-33, TA-54-48, TA-54-49, TA-54-153, TA-54-224, TA-54-229, TA-54-230, TA-54-231, TA-54-232, TA-54-283, TA-54-375, and TA-54-412, and on Pads 1, 9 and 10.

Description of General Capabilities:

These portable, manually operated fire extinguishers may be used by any qualified employee in the event of a small fire. For larger fires, the Emergency Operations and Support Center (EOSC) and the Los Alamos Fire Department (LAFD) are alerted.

Flame or smoke detection equipment and fire alarm pull stations are located within structures at TA-54-229, TA-54-230, TA-54-231, and TA-54-232.

Ultra-violet detectors, smoke and audible devices are located within structure TA-54-153.

Dry-chemical fire suppression systems are available at TA-54-1027, TA-54-1028, TA-54-1030, and TA-54-1041.

A dry-pipe fire suppression system is available at TA-54-412.

Fire alarm pull stations are available at TA-54-33, TA-54-48, TA-54-49, TA-54-153, TA-54-224, TA-54-229, TA-54-230, TA-54-231, TA-54-232, TA-54-283, TA-54-375, and TA-54-412.

Description of General Capabilities:

Fire alarms may be activated by any employee in the event of a fire to notify the LAFD and the EOSC. The EOSC and LAFD are also notified upon activation of the flame or smoke detectors.

Several fire hydrants are located in Area G. These fire hydrants will supply water at an adequate volume and pressure to satisfy the requirements of 40 CFR 264.32(d)

SPILL CONTROL EQUIPMENT

Spill control stations and/or portable spill kits are located at TA-54-8, TA-54-33, TA-54-48, TA-54-49, TA-54-153, TA-54-224, TA-54-229, TA-54-230, TA-54-231, TA-54-232, TA-54-283, TA-54-375, and TA-54-412.

Each spill kit generally includes bags of absorbent and an inventory of tools and supplies.

COMMUNICATION EQUIPMENT

Cellular telephones with text capabilities and/or two-way radios are given to employees working in the area and are the primary emergency communication equipment for Area G. Personnel will carry cellular telephones, or two-way radios, or will have immediate access to communication equipment through visual or voice contact with another employee.

~~Emergency alarm system—loud speakers located throughout the site.~~

~~Evacuation alarm buttons are located at or near TA-54-33, TA-54-48, TA-54-49, TA-54-153, TA-54-224, TA-54-229, TA-54-230, TA-54-231, TA-54-232, TA-54-283, TA-54-375, TA-54-412, Pads 1, 9 and 10 and at various muster stations.~~

Description of General Capabilities:

Cellular telephones and, two-way radios and alarms located throughout Area G can be used to notify personnel of an emergency. The emergency notification system can also be utilized to alert workers of appropriate response actions. ~~Evacuation alarms have horns mounted on telephone poles throughout Area G that emit an audible alarm that can be heard throughout Area G.~~ Employees can also be notified of an emergency situation and appropriate response action through the use of a text message sent on the emergency cellular telephone texting system, or by two-way radio.

DECONTAMINATION EQUIPMENT

Portable eyewash stations are located at permitted units located at TA-54 Area G during waste management operations involving free liquids.

One permanent, hard-plumbed eyewash station and a safety shower is located in TA-54-33.

Safety Data Sheets (SDSs) are available hard copy or via online database.

Description of General Capabilities:

Emergency shower and eyewash stations are used by personnel who receive a chemical splash to the skin or eyes. Specific SDSs for the chemical(s) being managed should be obtained prior to working with hazardous or mixed waste to determine if the application of water is indicated for decontamination.

PERSONAL PROTECTIVE EQUIPMENT

Personnel at Area G are required to use appropriate personal protective equipment (PPE) to protect themselves from the hazards found in the workplace under normal conditions. This PPE may include gloves, steel-toed shoes, and safety glasses. Additional PPE may be required during an unusual hazardous situation and can be found in the spill kits or at various locations throughout the site.

Attachment 2

Certification

EPC-DO-23-322
LA-UR-23-31807



Class 1 Permit Modification to Update Contact Information and Upgrade Emergency Equipment in the Los Alamos National Laboratory Hazardous Waste Facility Permit

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.

STEVEN STORY
(Affiliate)

Digitally signed by STEVEN
STORY (Affiliate)
Date: 2023.11.08 14:00:42 -07'00'

11/8/23

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

Date Signed

Robert A. Gallegos

Digitally signed by Robert A.
Gallegos
Date: 2023.11.22 08:53:10 -07'00'

11/22/23

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

Date Signed

Robert Edwards

Digitally signed by Robert Edwards
Date: 2023.11.01 05:53:18 -06'00'

11/1/23

Robert Edwards III, Program Manager
Environment, Safety, Health, and Quality Program
Newport News Nuclear BWXT-Los Alamos, LLC
U.S. Department of Energy

Date Signed

Digitally signed by BRIAN
HARCEK
Date: 2023.11.07 13:08:36 -07'00'

11/7/23

Brian Harcek, Acting Co-Director
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office
U.S. Department of Energy

Date Signed