

## LA-UR-20-25305

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Title: Notification of Planned Start of a Radiological Air Emissions Point  
Source: Venting of Flanged Tritium Waste Containers (FTWCs) at TA-54

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U.S. Environmental Protection Agency, Region 6  
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**SUBJECT: Notification of Planned Start of a Radiological Air Emissions Point Source:  
Venting of Flanged Tritium Waste Containers (FTWCs) at TA-54**

Dear Mr. Brozowski:

This memo serves as a Notification of Startup under 40 CFR 61.09(a)(1) for a new point source of radionuclide air emissions at Technical Area 54 at Los Alamos National Laboratory (LANL or the Laboratory). This building will be used for the venting operation of the Flanged Tritium Waste Containers (FTWCs). This operation was originally planned to commence in April 2020 but was delayed by the COVID-19 pandemic. LANL plans to declare operational readiness to commence operations on September 11, 2020. Venting activities will begin on that day or shortly thereafter. 40 CFR 61.09 states:

61.09 Notification of Startup.

(a) The owner or operator of each stationary source ... shall furnish the Administrator with written notification as follows:

- (1) A notification of the anticipated date of initial startup of the source not more than 60 days nor less than 30 days before that date.
- (2) A notification of the actual date of initial startup of the source within 15 days after that date.

As required in 61.09(a)(2), we will be notifying you of the actual start date of radiological operations shortly after operations commence.

Activities planned for the FTWC venting were described in detail in our Application for Pre-construction Approval dated May 17, 2019. We received EPA approval of the pre-construction

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application on May 22, 2019. A change in scope of planned operations, reflecting the potential for venting at multiple LANL locations, was sent to EPA on March 5, 2020.

The source will be continuously monitored for emissions of tritium. Additionally, an emissions management plan has been established for this source to ensure regulatory and administrative limits are not exceeded. Stack flow characterization testing was successfully conducted on a scale model of the venting system in 2019 as part of the stack design process. Validation tests (flow velocity and cyclonic flow measurements) were successfully completed in October 2019. Documentation of the stack and sample system is maintained on-site for your review.

If you have questions or comments, please contact David Fuehne of my staff. David can be reached by email at [davef@lanl.gov](mailto:davef@lanl.gov) or by phone at (505) 699-5619.

Sincerely,

TAUNIA VAN  
VALKENBURG  
(Affiliate)

Digitally signed by TAUNIA  
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