

LA-UR-23-23926

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Title: Hazardous Waste Facility Permit Class 2 Permit Modification Public Meeting

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Environmental Regulatory Document

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Hazardous Waste Facility Permit

Class 2 Permit Modification Public Meeting

April 19, 2023

LA-UR-23-23926

WebEx

From Link:

<https://lanl-us.webex.com/lanl-us/j.php?MTID=md3aa442009bba2308759287a2b978e91>

Using meeting number: 2456 245 3427 (access code)

Meeting password: PublicMeeting

By phone: +1-415-655-0002 (US Toll) Meeting number: 2456 245 3427

Agenda

Department of Energy

- Robert A. Gallegos

TA-60-0017 for Waste Management Division

- Tony D. Garcia, Program Manager

Permit Modification

- Candie M. Arellano

Questions

Close

TA-60-0017 Waste Management

- Please
 - Wait until the scheduled time to ask questions
 - Identify yourself before speaking
 - Keep your questions short remember there may be others waiting to ask questions
 - Honor the process by keeping questions civil and by using appropriate language
 - Yield the floor if requested by the facilitator
 - Help the participants and facilitator ensure that the agenda content and timeframes are met

Robert A. Gallegos

NNSA Los Alamos Field Office

DOE and LANL

- **Established in 1943 to support the Manhattan Project**
 - Accountability for the site transitioned between 4 Federal Agencies before DOE
- **LANL is an NNSA Site, oversight of NNSA mission is performed by the NNSA Los Alamos Field Office (NA-LA)**
 - Mission: To strengthen United States' security through the military application of nuclear energy and by reducing the global threat from terrorism and weapons of mass destruction
- **Operated by Contractors for the Government since 1943**
 - Triad National Security, LLC is the current Management & Operating contractor since 2018
 - DOE/NA-LA and Triad are co-Permittees for 17 units within the RCRA Hazardous Waste Facility Permit for LANL in support of the NNSA-mission

Tony D. Garcia
Program Manager
Waste Management Division Office

TA-60-0017 South Section

- Critical to facility operations and enduring mission success
- Safe storage and consolidation of RCRA hazardous waste and mixed low-level wastes for more than 90 days.
- Transitions from a central accumulation area to a RCRA permitted unit allowing storage up to 1-year.
- Near term solution until a more permanent solution is identified.
- Supports the need for longer-term waste storage options.

TA-60-0017 South Section

- Current use as Central Accumulation Area (CAA)
 - Consolidation of hazardous and mixed waste generated throughout the Laboratory
 - Managed for storage of hazardous and mixed low-level waste for less than 90 days
 - Waste shipped offsite directly from TA-60-0017 South Section
- Design
 - Existing, Pre-Engineered, Steel Frame Structure
 - 120 feet long by 29 feet wide by 23 feet high
 - 3,480 square feet
- Storage Capacity
 - 17,600 gallons (estimated)
 - 320 55 gallon drum equivalent
- All waste stored on pallets in DOT compliant containers

TA-60-0017 Site Plan



Legend

Southern Portion of TA-60-0017
Hazardous Waste Management Unit



New Mexico State Plane Coordinate System, Central Zone (3002)
North American Datum, 1983 (NAD 83), US Survey Ft.

Map Number: 19-142-13, February 2020
Bethann McVicker, IFPROG



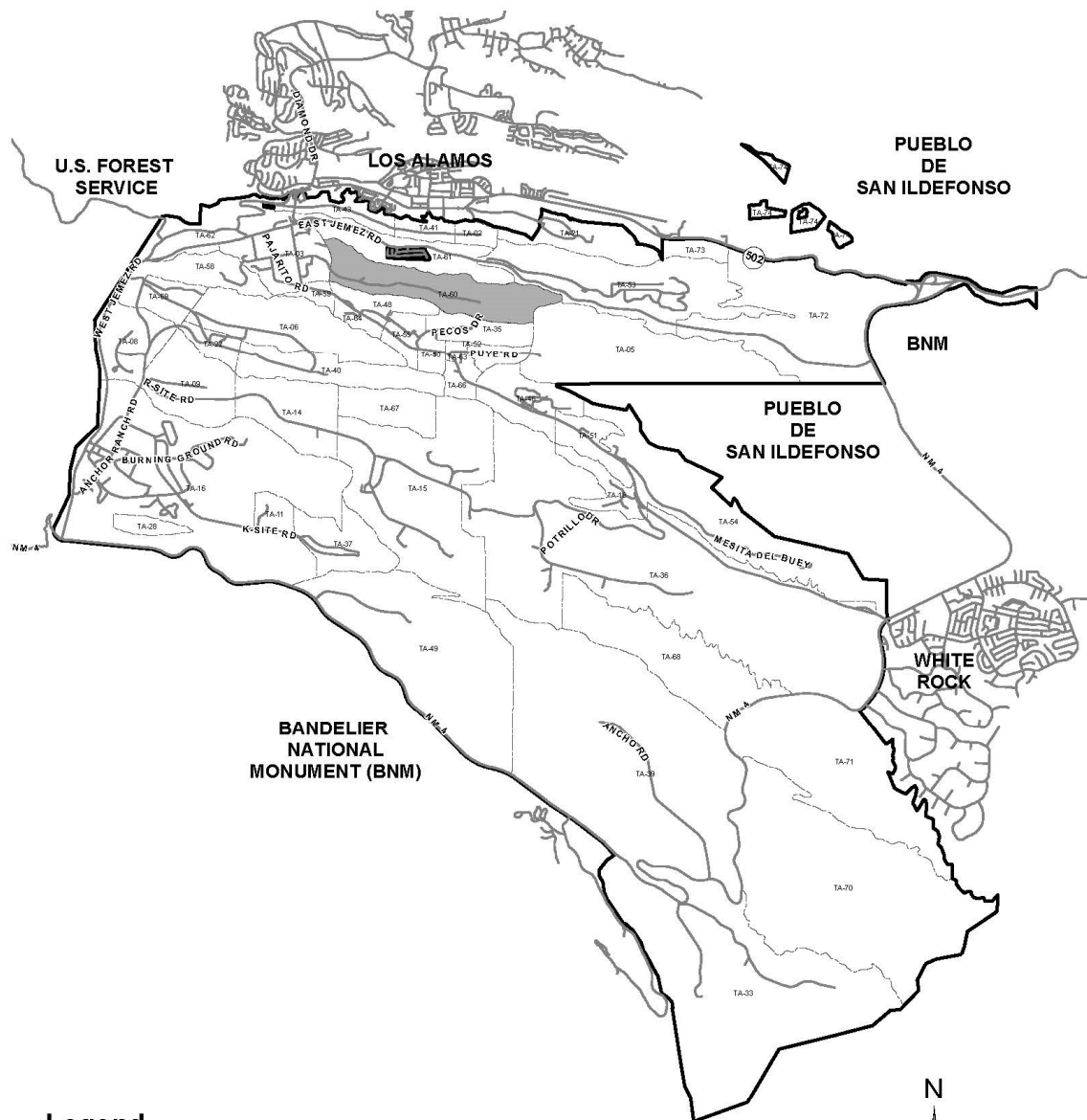
GIS Program

Candie M. Arellano

EPC-WMP: RCRA Compliance & Permitting

2010 LANL Hazardous Waste Facility Permit

- Issued November 2010, effective December 2010
- Managed by NA-LA and Triad National Security, LLC
 - 9 storage/treatment units (TAs 3, 50, 54, 55, & 63)
 - 6 storage units (TAs 50 & 55)
 - 1 storage tank system (TA-55)
 - 1 cementation treatment unit (TA-55)
- Managed by the Environmental Management Los Alamos Field Office and the Los Alamos Legacy Cleanup Contractor
 - 9 storage/treatment units (TA-54)
 - 1 storage units (TA-54)



Legend

- Technical Area 60
- Not LANL Property
- Roads
- LANL Boundary
- TA Boundaries

0 5,000 10,000
Feet



Description of Permit Modification Request

- Increase storage capacity at LANL to provide for operational flexibility and mission success
- TA-60-0017, southern portion – 17,600 gallons
- Class 2 Permit Modification
 - 40 CFR § 270.42, Appendix I, Item F.1.b – Addition of container unit resulting in up to 25% increase in the facility's container storage capacity
 - 40 CFR § 270.42, Appendix I, Item F.1.c – Addition of treatment processes necessary to treat wastes that are restricted from land disposal



Content of Permit Modification Request

- Introduction and overview of the permit modification request
- Crosswalk of the regulatory requirements associated with the proposed unit
- Description of processes and procedures at TA-60-0017 that address:
 - Waste-handling procedures
 - Waste characterization
 - Security
 - Preparedness
 - Hazards prevention
 - Emergency equipment
 - Inspection requirements
 - Recordkeeping requirements
- Closure requirements and closure plan
- Description of the seven solid waste management units (SWMUs) within a 1,000-ft radius of the southern portion of TA-60-0017
- List of references

Content of Permit Modification Request Continued...

- Part A Form and Other Part A Application Requirements
- Seismic Report for the TA-60 Facility
- Proposed Modifications to the LANL Hazardous Waste Facility Permit – Red Line/Highlight
- TA-60 Traffic Data and a LANL Traffic Study
- TA-60-0017 Design Drawings

Necessary Changes to the Permit

Minor additions and changes within the text

- Permit Part 1, General Permit Conditions
 - Permit Table 1.2.1, *List of Hazardous Waste Management Units and Co-Operators*, is revised to include TA-60.
 - Permit Section 1.5, *Effect of Inaccuracies in Permit Application*, is revised to include this permit modification request.
- Permit Part 3, Storage in Containers
 - Permit Section 3.15, *TA-60 Container Storage Requirements*, and subsection added to include a permitted unit at TA-60-0017.
- Permit Attachment A, *Technical Area (TA) – Unit Descriptions*
 - Permit Attachment Section A.7, TA-60, and subsection added to include TA-60-0017.

Necessary Changes to the Permit Continued...

Minor additions and changes within the text

- Permit Attachment B, *Part A Application*
 - Used of the most current EPA form
 - Updated contact information for owners and operators
 - Updates to the list of other environmental permits
 - Addition of the applicable information for TA-60-0017
- Permit Attachment D, *Contingency Plan*
 - Inclusion of available emergency equipment
- Permit Attachment G.31, *Technical Area 60, Building 17 Indoor Container Storage Unit Closure Plan*

Necessary Changes to the Permit Continued...

Minor additions and changes within the text

- Permit Attachment J, *Hazardous Waste Management Units*
 - Inclusion of applicable information for TA-60-0017 in Table J-1, Active Portion of the Facility
- Permit Attachment N, *Figures*
 - Revision of two figures (Figure 2 & Figure 3)
 - Addition of three figures specific to TA-60-0017 (Figures 51, 52, & 53)



Outside the southern
portion of TA-60-0017

Public Comment Process After Submittal

- Notifications of submittal to the public
 - Newspapers (March 16, 2023)
 - Email (LANL mailing list)
 - Public notice mailing (NMED-maintained facility mailing list)
- 60- day public comment period is started by newspaper public notice publication
- The Permit Modification is available for public review at the LANL Electronic and Hardcopy Public Reading Rooms
 - <http://epr.lanl.gov>
 - Hardcopy is located in Pojoaque and is by appointment only
- Also available at the NMED HWB office and on the NMED webpage
 - <https://www.env.nm.gov/hazardous-waste/lanl-permit/>

How to Make Comments:

- Public comment period from March 16, 2023 through May 11, 2023

- Submit written or email comments:

Neelam Dhawan, Program Manager
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505

- Email: neelam.dhawan@env.nm.gov
- NMED Public Comment Portal:
<https://nmed.commentinput.com/?id=95tDp>
- Comments must be made in writing or via e-mail and include the commenter's name and address