



# U.S. DEPARTMENT OF **ENERGY**

## **National Nuclear Security Administration**

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## **Environmental Management**

Los Alamos Field Office  
1200 Trinity Drive, Suite 400P  
Los Alamos, New Mexico 87544  
(240) 562-1122

Date: December 9, 2022

**EPC-DO-22-308**

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

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

Dear Mr. Shean:

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 (the Permit), EPA ID# NM0890010515. The Permit authorizes the Permittees to manage, store, and treat hazardous waste at LANL. Collectively the Permittees include the U.S. Department of Energy (DOE) and its field offices, the National Nuclear Security Administration, Los Alamos Field Office (NA-LA) and the Environmental Management, Los Alamos Field Office (EM-LA), together with Triad National Security, LLC (Triad) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B). This Permit modification provides changes to the Contingency Plan, contained in Attachment D of the Permit, and includes updated contact information for an Alternate Incident Response Commander, identified as the functional equivalent of the Emergency Coordinator (Title 40 of the Code of Federal Regulations [40 CFR] §264.55), and an update to modernize references to emergency communication technology in Technical Area 54 Tables D-1, D-2, and D-3, identified as replacement with functionally equivalent or upgraded equipment.

The Permittees have prepared this permit modification in accordance with 40 CFR §270.42(a)(1). Changes made to the Permit as part of this modification fall under the conditions of Appendix I of 40 CFR §270.42 for Class 1 permit modifications that do not require prior approval. A full description of the permit modification, the rationale for the classification type, proposed changes to Attachment D, and a signed certification page are included in Enclosure 1.

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 Permit Attachment. 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 questions or comments for Triad concerning this submittal, please contact Karen E. Armijo (NA-LA) at (505) 665-7314 or Patrick L. Padilla (Triad) at (505) 412-0462.

If you have questions or comments for N3B concerning this submittal, please contact Arturo Duran (EM-LA) at (575) 373-5966 or Christian Maupin (N3B) at (505) 695-4281.

Sincerely,

**KAREN  
ARMIJO**

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KAREN ARMIJO  
Date: 2022.12.07  
15:09:55 -07'00'

Karen E. Armijo  
Permitting and Compliance Program Manager  
National Nuclear Security Administration  
Los Alamos Field Office  
U.S. Department of Energy

Sincerely,

**EPC08**



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M. Lee Bishop, Director  
Office of Quality and Regulatory Compliance  
Environmental Management  
Los Alamos Field Office  
U.S. Department of Energy

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

copy w/enclosures:

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[lasomailbox@nnsa.doe.gov](mailto:lasomailbox@nnsa.doe.gov)  
[n3brecords@em-la.doe.gov](mailto:n3brecords@em-la.doe.gov)  
[emla.docs@em.doe.gov](mailto:emla.docs@em.doe.gov)

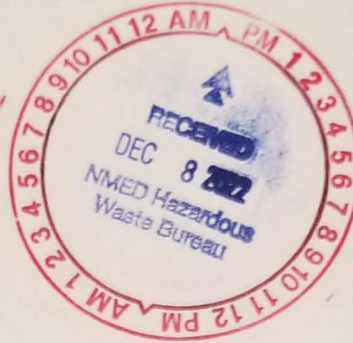


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**Environmental Management**

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Date: December 9, 2022

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

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LA-UR-22-31055

Document: LANL Class 1 Permit Mod  
Date: December 2022

## ENCLOSURE 1

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

Date: December 9, 2022

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

This document contains a Class 1 Permit Modification to update the Los Alamos National Laboratory Hazardous Waste Facility Permit (Permit). The U.S. Department of Energy and its field offices, the National Nuclear Security Administration, Los Alamos Field Office and the Environmental Management, Los Alamos Field Office; together with Newport News Nuclear BWXT Los Alamos, LLC and Triad National Security, LLC, collectively the Permittees, provide the Permit modifications herein which are identified using underlined, red text for additions and redline strikeout for deletions.

Attachment 1 of this modification provides updates to Attachment D, *Contingency Plan* regarding contact information in Section D.1.1 and updated emergency equipment in Technical Area (TA) 54 Tables D-1, D-2, and D-3. A certification page in accordance with the requirements of Title 40 of the Code of Federal Regulations (40 CFR) §270.11 is included as Attachment 2.

### **BASIS**

This Permit modification has been drafted in accordance with 40 CFR §270.42 (a)(1) and incorporates updated information that meets the conditions for a Class 1 permit modification without prior approval listed within Appendix I of 40 CFR §270.42. Changes to Permit Section D.1.1 of Attachment D meet the conditions specified in 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*. Furthermore, the equipment changes in TA-54 Tables D-1, D-2, and D-3 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*.

### **DESCRIPTION**

The contact information for an Alternate Incident Response Commander was updated in Permit Section D.1.1. TA-54 Tables D-1, D-2, and D-3 were updated to utilize modern emergency communication technology. The use of pagers was replaced with alarms and cellular telephones as part of the emergency notification system. All changes are identified in Attachment 1 using underlined, red text for additions and redline strikeout for deletions.



# Notification of a Class 1 Permit Modification to Update Contact Information and 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.

**Robert M. H.  
Macfarlane**

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Macfarlane  
Date: 2022.11.03 06:38:20 -06'00'

**11/03/2022**

Date Signed

**Robert Macfarlane**

Program Manager  
Environment, Safety, Health and Quality  
Newport News Nuclear BWXT-Los Alamos, LLC

**JENNIFER PAYNE  
(Affiliate)**

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PAYNE (Affiliate)  
Date: 2022.11.17 14:06:28 -07'00'

**11/17/2022**

Date Signed

**Jennifer E. Payne**

Division Leader  
Environmental Protection and Compliance Division  
Triad National Security, LLC  
Los Alamos National Laboratory

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**11/10/2022**

Date Signed

**M. Lee Bishop**

Director  
Office of Quality and Regulatory Compliance  
U.S. Department of Energy  
Environmental Management  
Los Alamos Field Office

**KAREN ARMIJO**

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Date: 2022.12.07 15:10:21 -07'00'

**07Dec2022**

Date Signed

**Karen E. Armijo**

Permitting and Compliance Program Manager  
National Nuclear Security Administration  
Los Alamos Field Office  
U.S. Department of Energy

## **Attachment 1**

**Replacement Pages for Attachment D, *Contingency Plan***





Alternates:

Aaron Brick  
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Santa Fe NM, 87506~~Steve Mullins~~  
~~112 Azure~~  
~~White Rock, NM 87547~~  
(W) 505-667-2400  
(C) ~~505-695-8824~~~~505-695-3161~~  
(H) ~~505-514-1116~~

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

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 handling of chemicals, make recommendations on protective clothing and equipment, and provide exposure and treatment information to responders. The field monitoring team leader supervises field monitoring activities to determine the boundaries of the potential release. The HAZMAT personnel may obtain resources from environmental monitoring groups, such as health physics and industrial hygiene personnel.

#### **D.1.3 Environmental Regulation and Waste Management Compliance Response**

At the scene, representatives and technical advisors from the environmental regulation and waste compliance personnel and other response personnel are coordinated by the IC. In addition to

## **COMMUNICATION EQUIPMENT**

~~Alpha-numeric emergency pagers, e~~Cellular telephones with ~~page~~/text capabilities, and/or two-way radios are given to employees working in the area. Personnel will carry cellular telephones; ~~paggers~~ 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 paging-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 ~~the emergency alpha-numeric pagers or~~ cellular telephones with ~~page~~/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 paging-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.

## **COMMUNICATION EQUIPMENT**

~~Alpha-numeric emergency pagers are given to employees working in the area. Additional equipment includes portable two-way radios and cellular telephones.~~ Personnel will carry cellular telephones, ~~paggers, to or~~ two-way radios or will have immediate access to communication equipment through visual or voice contact with another employee.

Emergency paging 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:

~~Loud speakers, paging~~ Cellular telephones, ~~two-way radios equipped with public address capabilities,~~ and alarms located throughout Area G can be used to notify personnel of an emergency. The emergency paging 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 ~~alpha-numeric paggers or~~ 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.

Public address (PA) capabilities are located in TA-54-38 in the high bay, in the low bay, and outside the main entrance.

~~Alpha numeric emergency pagers are given to employees working in the area.~~

Additional equipment includes portable two-way radios and cellular phones. Personnel will carry cellular telephones, ~~paggers,~~ or two-way radios or will have immediate access to communication equipment through visual or voice contact with another employee.

Description of General Capabilities:

PA capabilities for internal communication are available for use by any employee. Employees can be notified of an emergency situation and appropriate response actions through the use of a text message sent on ~~the emergency alpha numeric paggers,~~ cellular telephones, or by two-way radio. The evacuation alarm can be heard throughout TA-54-38. The fire alarm is a double slow-whoop sound. Fire and evacuation alarms are activated in the event of a fire or evacuation. The emergency PA can be utilized to alert workers of an emergency situation as well as appropriate response actions.

**DECONTAMINATION EQUIPMENT**

Safety showers and portable eyewash stations are located in TA-54-38 in the high bay and on the loading dock. The portable eyewash stations will be present during active waste management operations involving free liquids at these locations.

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

Description of General Capabilities:

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

**PERSONAL PROTECTIVE EQUIPMENT**

Personnel at TA-54 West are required to use appropriate personal protective equipment (PPE) to protect themselves from the hazards found in the workplace under normal conditions. This PPE includes 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 or at adjacent TA-54 facilities.

Gloves and goggles are found in the spill kits located at TA-54-38.

All workers located within the operating limits of a crane (fixed or mobile) wear hard hats.