



Environmental Protection & Compliance Division

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National Nuclear Security Administration

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Date: SEP 03 2020

Symbol: EPC-DO: 20-238

LA-UR: 20-25245

Locates Action No.:

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

Subject: Notification of Planned Start of a Waste Management Activity, Los Alamos National Laboratory Hazardous Waste Facility Permit, EPA ID# NM0890010515

Dear Mr. Pierard:

The purpose of this letter is to notify the New Mexico Environment-Hazardous Waste Bureau (NMED-HWB) of a planned start date to conduct waste management activities associated with a Temporary Authorization Request for waste treatment, storage and repackaging submitted for approval by the U.S. Department of Energy (DOE) and Triad National Security, LLC (Triad) on March 9, 2020 (EPC-DO: 20-074). This Temporary Authorization Request was submitted to support the storage and processing (venting, sorting, segregation, and repackaging) of four Flanged Tritium Waste Containers (FTWCs) to meet DOT requirements to facilitate safe off-site disposal pursuant to NMAC 20.4.1.900 (incorporating 40 CFR § 270.42(e)(3)). On March 10, 2020, DOE-Triad issued a public notice of the Temporary Authorization Request and the notice was distributed to the NMED-maintained facility mailing list per the requirements of NMAC 20.4.1.1102 (incorporating 40 CFR §124.10(c) (1)(ix)).

As addressed in the Temporary Authorization Request, this small operation to place these four containers in a safe configuration for handling and out-of-state transport is an important step in reducing LANL's waste inventory and risk. While these containers pose a minor, manageable hazard in their current configuration, they cannot be shipped without verifying headspace pressures have been relieved, and pressure build up over time becomes increasingly more difficult to mitigate. Once it is verified that pressure has been relieved, extensive analysis and review has shown that the

containers can be safely handled and transported for preparation for out-of-state shipping, and all containers will meet DOT regulations for shipment. In addition, these containers have been stored for an extended period of time per LANL's Site Treatment Plan and all stakeholders are eager to permanently disposition this difficult waste stream. As stated in the Temporary Authorization Request, this project is limited to these four containers and does not represent an ongoing waste generation process. Thus, upon completion of this project, the Temporary Authorization is no longer needed and the containers will be removed in the next revision of the Site Treatment Plan.

Related to this request, an application to construct or modify a structure or facility pursuant to the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61 has been approved by USEPA Region 6 for this activity, and that application has been posted in the LANL Electronic Public Reading Room (EPRR). Site emission thresholds for this activity have not been increased, and the entire project will be performed without exceeding any existing limits. In addition to the public process requirements for a Temporary Authorization Request, NNSA and Triad provided information sharing sessions to the Los Alamos County Council, the Accord Pueblos, EPA Region 6 leadership, and the NMED. There are no open requests for information at this time, and NNSA and Triad have committed to providing schedule updates to those groups.

NNSA and Triad will not perform any activities addressed in the Temporary Authorization Request until the NMED-HWB approval is received and DOE Readiness and Authorization activities are completed. This operation was originally planned to commence in April 2020, but was delayed by the COVID-19 pandemic. LANL plans to start processing activities on or after September 11, 2020. We will work closely with our regulatory and oversight agencies to finalize the planned venting dates upon receiving approval to conduct RCRA treatment.

If you have questions or comments concerning this notification, please contact Karen E. Armijo, DOE, at (505) 665-7314, or Patrick L. Padilla, Triad, at (505) 412-0462.

Sincerely,



Jennifer E. Payne
Division Leader
Environmental Protection & Compliance Division
Triad National Security, LLC

Sincerely,

Karen E.
Armijo

Digitally signed by
Karen E. Armijo
Date: 2020.09.01
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Karen E. Armijo
Permitting and Compliance Program Manager
National Nuclear Security Administration
U.S. Department of Energy

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Date: **SEP 03 2020**
Special: EPC-DO: 20-238
L4-LR: 20-25245

Locates Action No.



Mr. Kevin Plamed, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodas Park Drive East, Building 1
Santa Fe, NM 87505-6313

Subject: Notification of Planned Start of a Waste Management Activity, Los Alamos National Laboratory Hazardous Waste Facility Permit, EPA ID# NM0099010515

Dear Mr. Plamed:

The purpose of this letter is to notify the New Mexico Environment-Hazardous Waste Bureau (NMEH-WHB) of a planned start date to conduct waste management activities associated with a Temporary Authorization Request for waste treatment, storage and repackaging submitted for approval by the U.S. Department of Energy (DOE) and Triad National Security, LLC (Triad) on March 9, 2020 (EPC-DO: 20-074). This Temporary Authorization Request was submitted to support the storage and processing (testing, sorting, segregation, and repackaging) of four Flanged Titanium Waste Containers (FTWCs) to meet DOT requirements to facilitate safe off-site disposal pursuant to NMAC 20.4.1.900 (incorporating 40 CFR § 270.42(e)(7)). On March 10, 2020, DOE-Triad issued a public notice of the Temporary Authorization Request and the notice was distributed to the NMEH-maintained facility mailing list per the requirements of NMAC 20.4.1.1102 (incorporating 40 CFR § 124.10(c)(1)(ix)).

As addressed in the Temporary Authorization Request, this small operation to place these four containers in a safe configuration for handling and (as-of-site transport is an important step in reducing LANL's waste inventory and risk. While these containers pose a minor, manageable hazard in their current configuration, they cannot be shipped without verifying headspace pressures have been relieved, and pressure build up over time becomes increasingly more difficult to mitigate. Once it is verified that pressure has been relieved, extensive analysis and review has shown that the

