



Environmental Protection & Compliance Division
Los Alamos National Laboratory
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National Nuclear Security Administration
Los Alamos Field Office
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Los Alamos, New Mexico, 87544
(505) 667-5105/Fax (505) 667-5948

Date: **SEP 18 2020**
Symbol: EPC-DO: 20-276
LA-UR: 20-26414
Locates Action No.: Not applicable

Mr. Kevin Pierard, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

**Subject: Notification of a Class 1 Permit Modification to the 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 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). The Permit authorizes the U.S. Department of Energy (DOE); Triad National Security, LLC (Triad); and Newport News Nuclear BWXT-Los Alamos, LLC (N3B) to manage, store, and treat hazardous waste at LANL. This permit modification provides changes to the Contingency Plan in Attachment D and includes an updated telephone number for the Alternate Incident Response Commander, identified as the functional equivalent of the Emergency Coordinator (40 CFR §264.55); and an update to the Figure D-1 title as well as the new phone number for the Emergency Operations Support Center listed in Figure D-1.

Triad and DOE have prepared this permit modification in accordance with Title 40 of the Code of Federal Regulations (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. A full description of the permit modification, 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 comments or questions regarding this permit modification, please contact Patrick Padilla at (505) 667-3932 (Triad) or Karen Armijo at (505) 665-7314 (NA-LA).

Sincerely,

**JENNIFER
PAYNE (Affiliate)**

Digitally signed by
JENNIFER PAYNE (Affiliate)
Date: 2020.09.08 21:58:28
-06'00'

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

Sincerely,

**Karen E.
Armijo**

Digitally signed by Karen E.
Armijo
Date: 2020.09.10 16:28:33
-06'00'

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

JEP/KEA/PLP/CMA:

Enclosures (s): 1) Class 1 Permit Modification to Update Contact Information in the Los Alamos National Laboratory Hazardous Waste Facility Permit

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COPY



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Hazardous Waste Facility Permit, EPA ID# NM0890010515

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Triad and DOE have prepared this permit modification in accordance with Title 40 of the Code of Federal Regulations (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. A full description of the permit modification, rationale for the classification type, proposed changes to Attachment D, and a signed certification page are included in Enclosure 1.

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ENCLOSURE 1

**Class 1 Permit Modification to Update Contact Information,
in the Los Alamos National Laboratory Hazardous Waste
Facility Permit**

EPC-DO-20-276

LA-UR-20-26414

Date: SEP 18 2020

Class 1 Permit Modification to Update Contact Information 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 (LANL) Hazardous Waste Facility Permit (Permit). The Permit modifications provided herein have been made by the Department of Energy (DOE) and Triad National Security, LLC (Triad), and are identified using underlined, red text for additions and redline strikeout for deletions.

Attachment 1 of this modification provides updated contact telephone phone numbers and an updated title of Figure D-1 throughout Attachment D, *Contingency Plan*. 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 and Figure D-1 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 title changes throughout Attachment D, *Contingency Plan* meets the conditions specified in 40 CFR §270.42, Appendix I, Item A.1 – administrative and informational changes.

DESCRIPTION

The telephone number for the Alternate Incident Response Commander was updated in Permit Section D.1.1. Figure D-1 was updated to reflect the new phone number for The Emergency Operations and Support Center (EOSC) for reporting emergencies and incidents at the Laboratory. The new line, 505-667-2400, replaces 505-667-6211 and is available 24 hours a day, 7 days a week. Calls to 505-667-6211 will automatically forward to 505-667-2400. A non-technical update is the title of Figure D-1, previously titled “General Hazardous and Mixed Waste Emergency Notification Structure” is now titled “General Hazardous Waste Emergency Notification System”. This change is also reflected in Attachment D Table of Contents, List of Figures and Section D.1. All changes are identified in Attachment 1 using underlined, red text for additions and redline strikeout for deletions.

Attachment 1

Replacement Pages for Attachment D, *Contingency Plan*

LIST OF FIGURES

FIGURE NO.

TITLE

D-1

General Hazardous ~~and Mixed~~ Waste Emergency Notification
~~System~~Structure

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 Structure, 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

Alternates:

Jeremy Grondin
6940 Napoleon Road NE
Rio Rancho, NM 87144
(W) 505-667-2400
(C) 505-695-3353
(W) 505-500-7160

Steve Mullins
112 Azure
White Rock, NM 87547
(W) 505-667-2400
(C) 505-695-3161
(H) 505-514-1116

Ted Ulibarri
County Rd. 88
Santa Fe, NM 87506
(W) 505-667-2400
(C) 505-412-8737
(H) 505-614-~~40104218~~

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.

Figure D-1

General Hazardous and Mixed Waste Emergency Notification Structure

Figure D-1
General Hazardous and Mixed Waste Emergency Notification System

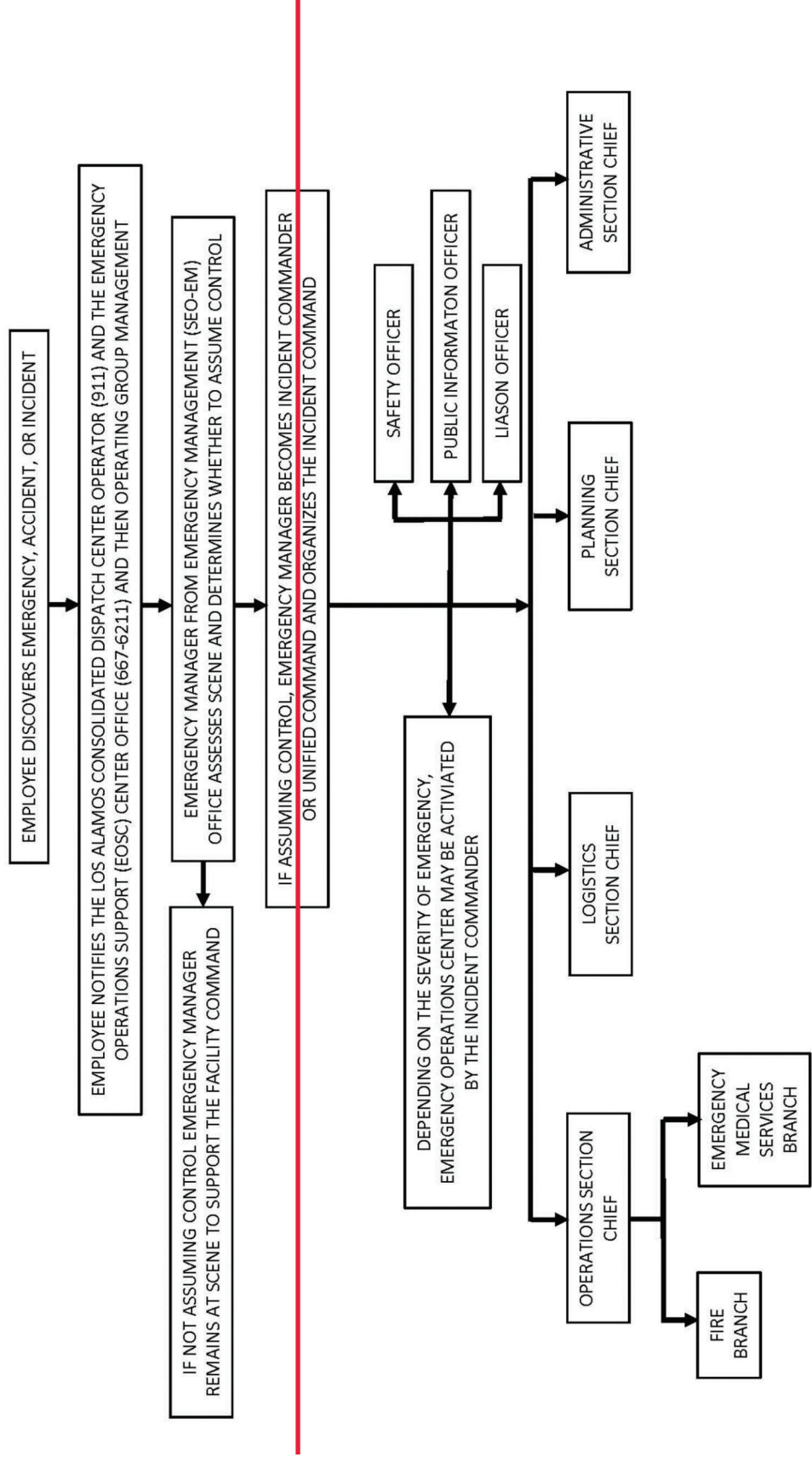
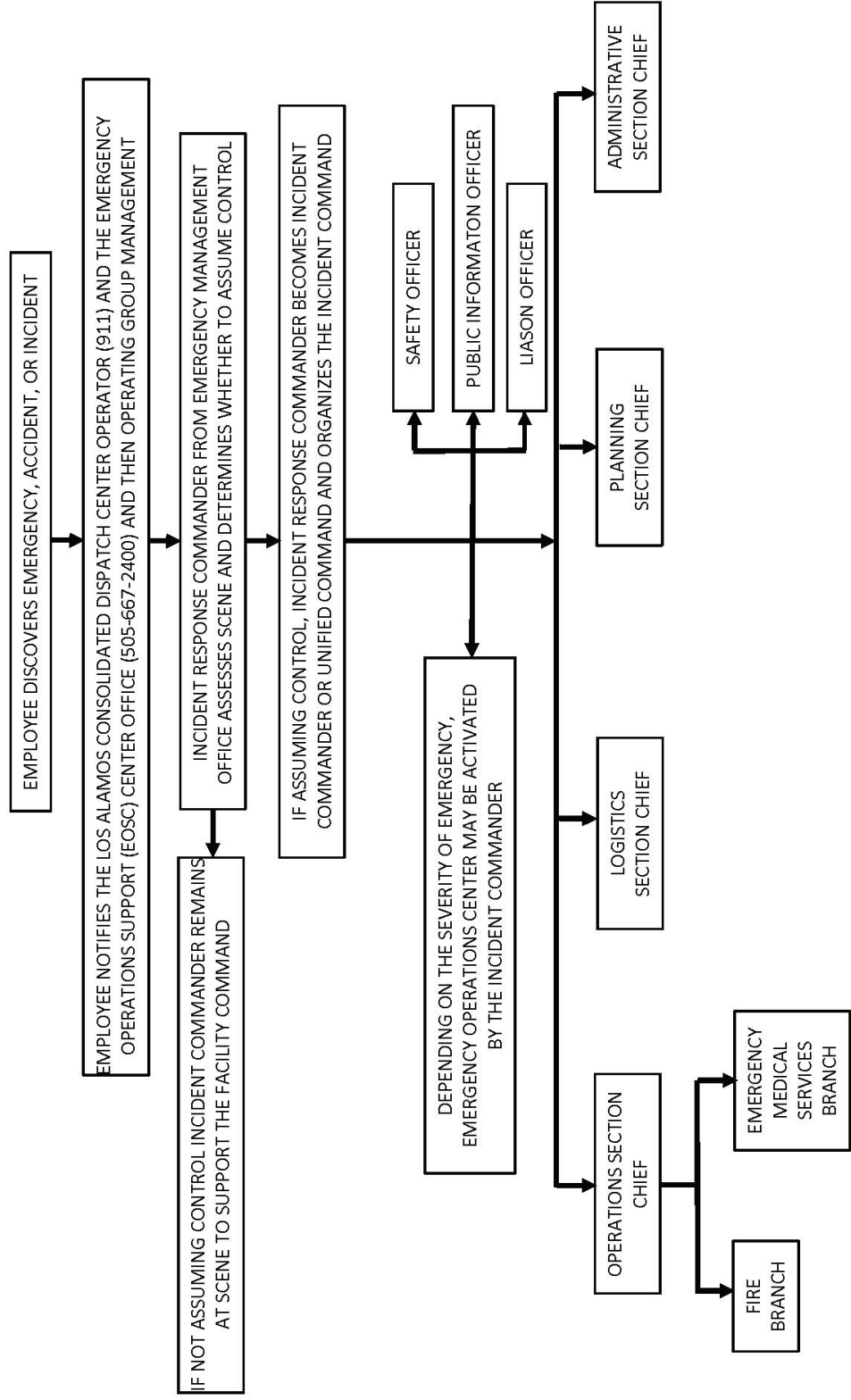


Figure D-1
General Hazardous Waste Emergency Notification System



Attachment 2
Certification

CERTIFICATION

CERTIFICATION STATEMENT OF AUTHORIZATION

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.

**JENNIFER
PAYNE (Affiliate)**

Digitally signed by JENNIFER
PAYNE (Affiliate)
Date: 2020.09.08 21:59:25 -06'00'

9/8/20

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

Date Signed

Karen E. Armijo

Digitally signed by Karen E. Armijo
Date: 2020.09.10 16:30:03 -06'00'

9/18/20

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

Date Signed