



New Mexico Environment Department

LANL Community Engagement Meeting



Stephanie Stringer, RPD Director
November 12, 2020

Agenda

- Welcome
- Ground Rules
- Topics Overviews:
 - Proposed Venting of Tritium Contaminated Waste Containers
 - Middle Delta Prime (DP) Road Contamination
 - Compliance Order on Consent
- Community Discussion
- Communications



Ground Rules

- Each commenter will be allowed three (3) minutes to speak, once all commenters have spoken, commenters will be allowed additional time if time allows
- Please be respectful and keep your comments relevant to the topic of conversation
- Please be patient with technological issues



Proposed Venting of Tritium Contaminated Waste Containers



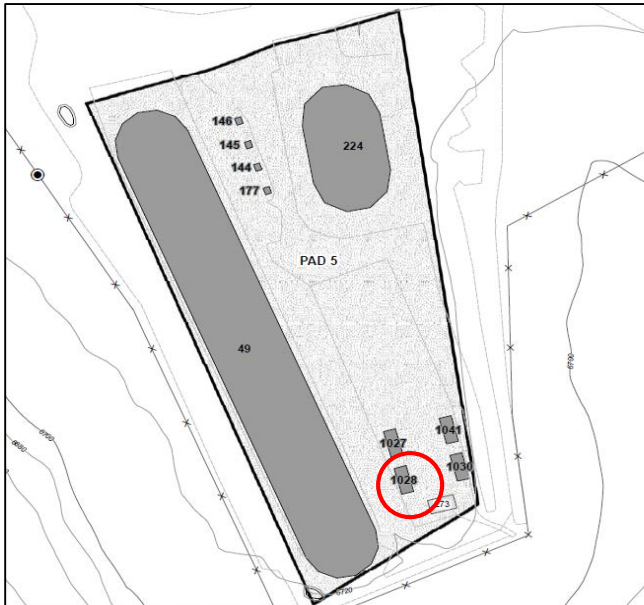
Overview



- ❑ Four Flanged Tritium Waste Container (FTWCs) are currently stored at TA -54
- ❑ FTWCs were packaged at LANL's Weapon Engineering Tritium Facility (WETF) at TA-16
- ❑ Low level mixed waste in FTWCs was generated between 1996 and 1997 and was moved to TA-54 in 2007
- ❑ Radiolysis of tritiated water over time has potentially resulted in hazardous concentrations of flammable hydrogen and oxygen mixture in the head space of FTWCs
- ❑ FTWCs do not meet Department of Transportation requirements and cannot be transported without pressure release
- ❑ FTWCs need to be vented prior to Transport, Treatment, and final Disposal



LANL Locations for TA Process



Waste is currently stored at Technical Area 54, Pad 5, in storage shed 1028 (circled in red).



Waste would be transported and repackaged at WETF TA-16-205 (circled in red)



Regulatory Authority

EPA (Air Emissions) – Approved Venting

- Jurisdictional authority pursuant to 40 CFR 61.07, National Emission Standards for Hazardous Air Pollutants

NMED (Hazardous Waste) – Approval Pending

- Federal Resource Conservation and Recovery Act (RCRA)
- New Mexico Hazardous Waste Act (HWA)
- New Mexico Hazardous Waste Permit and Corrective Action Fee Regulations [20.4.2 NMAC]



Temporary Authorization

- ❑ The venting of tritium, a radionuclide, does not fall under NMED jurisdiction. DOE self-regulates management of radionuclides
- ❑ RCRA allows TA for a one-time or a short-term activity for which a full permit modification is inappropriate
- ❑ TA Request seeks permission from NMED to for one-time treatment to release pressure, sort, store, segregate and repack the hazardous waste in FTWCs
- ❑ After treatment, the hazardous portion of the waste will be shipped off-site for final disposal



TA Process

- The Temporary Authorization Request would meet the following objectives:
 - Allow for treatment in containers or in containment buildings
 - Prevent disruption of ongoing waste management activities
- If TA is approved by NMED, it would be only for four FTWCs and treatment should be completed within 180 days
- **NMED carefully considering all aspects of this important decision**

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Middle DP Road



Overview

- Land parcels previously transferred from DOE to Los Alamos County
- Potentially hazardous and/or radiological debris discovered at Los Alamos County construction site (sewer upgrades) at four locations on Parcel A-16-a, A-8-a, and A-8-b
 - MDA B was LANL's first disposal area used in mid 1940s
 - Chemical and Radiological waste was disposed in MDA B
 - MDA B was remediated from 2009-2011



Middle Delta Prime (DP) Road



A-8-B utility trench north end looking south.

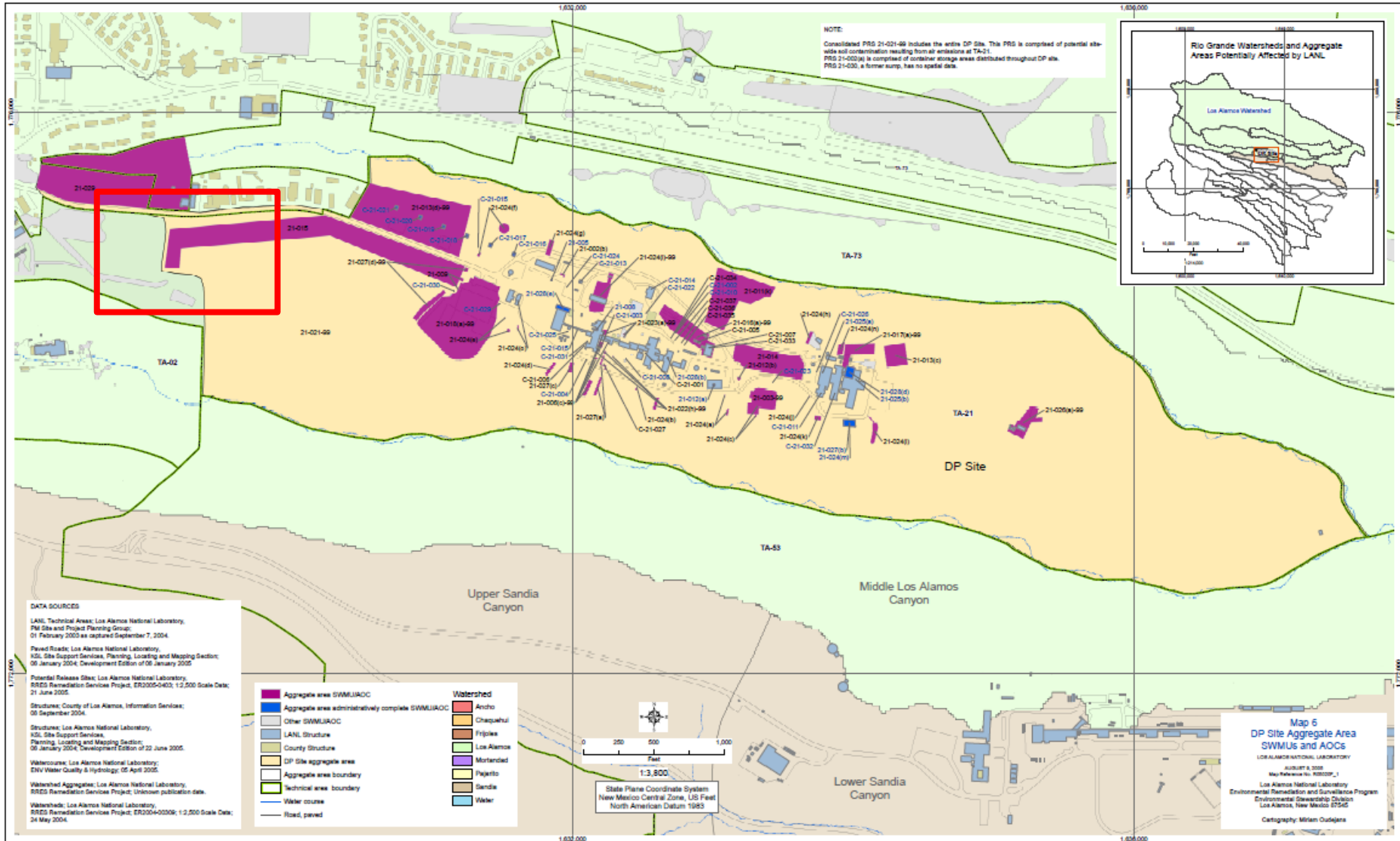


Middle DP Road Site Location





Middle DP Road Site Aggregate Area





Debris



Materials Found by DOE



Current Status

- ❑ DOE provides NMED with weekly updates
- ❑ Trenches backfilled with clean material
- ❑ Site is secured with fencing and DOE stormwater run-on and run-off management plan in place
- ❑ DOE and NMED DOE-OB are monitoring air quality





Next Steps

- DOE is preparing a Preliminary Screening Plan (PSP) to determine if hazardous waste constituents are found above residential screening levels
 - Potholing/Trenching
 - Geophysical Investigations
 - Sampling and Analysis of Contaminated Areas
 - Sampling and Disposal of Excavated Media
 - PSP Implementation Schedule
- NMED will review and approve PSP before implementation



2016 Compliance Order on Consent



Overview

- The Compliance Order on Consent (Consent Order, CO) was signed by the New Mexico Environment Department (NMED) and the U.S. Department of Energy (DOE) in June 2016 (minor modifications made Feb. 2017).
- Most corrective action for releases of hazardous waste or hazardous constituents at Los Alamos National Laboratory (LANL) are conducted under the Consent Order, not under the facility's Hazardous Waste Permit.
- The Consent Order is an “enforceable document” pursuant to 40 C.F.R. § 264.101 and is the sole mechanism for enforcing corrective action activities at LANL, with the exception of specific conditions which are addressed under the Permit.



FFY21 Annual Planning Process

- ❑ **Appendix C**: 17 Active Correction Action Campaigns
- ❑ **Appendix B: Milestones** (Subject to stipulated penalties) and **Targets** are selected for each fiscal year through Annual Planning Process (Appendix B, updated annually)
 - ❑ DOE Annual Update submitted 8/7/20
 - ❑ NMED considered proposed annual plan significantly deficient
 - ❑ DOE/NMED met numerous times to resolve
 - ❑ NMED Invoked Dispute Resolution on 10/01/20
 - ❑ Negotiations continue

<https://www.env.nm.gov/hazardous-waste/lanl/>



Communications



Communications

- To sign up for the NMED LANL facility stakeholder list (physical mailing list), email your contact info to: Neelam.Dhawan@state.nm.us
- To sign up for NMED Email or Text Updates:
<https://public.govdelivery.com/accounts/NMED/subscribe/new>
 - Select Los Alamos National Laboratory under “Project Updates”



Thank You

**Stephanie Stringer, Director
Resource Protection Division**

stephanie.stringer@state.nm.us

(505) 382-1655