



DEPARTMENT OF ENERGY
National Nuclear Security Administration
Los Alamos Site Office
Los Alamos, New Mexico 87544



AUG 18 2011

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. John Kieling, Manager
RCRA Permits Management Program
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Dear Mr. Kieling:

Subject: Transmittal of Class 1 Permit Modifications to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, EPA ID No. NM0890010515

The purpose of this letter is to submit a Class 1 permit modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit issued to the Department of Energy/ Los Alamos National Security, LLC (DOE/LANS) in November 2010. The permit modification includes changes to Table D-1 within the Attachment D (*Contingency Plan*) and Section F.1 within Attachment F (*Personnel Training Plan*) has been revised to update administrative and informational changes.

The proposed modifications have been prepared in accordance with the New Mexico Administrative Code, Title 20, Chapter 4, Part 1 (20.4.1.900 NMAC) (incorporating Code of Federal Regulations [CFR], Title 40 § 270.42(a)), revised March 1, 2009. In this case, the Class 1 modifications are strictly administrative and informational changes in accordance with 40 CFR § 270.42, Appendix I (a)(1).

The permit modification request package includes this transmittal letter and enclosed pages of the revised portions of the Permit (LA-UR-11-04184). The revisions consist of editorial changes to the language in the attachments to the Permit that are referenced above. Changes to Table D-1 are necessary to update phone numbers due to recent administrative changes in the groups that are available for assistance and guidance in the event of an emergency. The change within Attachment F is needed because of recent changes occurring to the LANL official Facility training database. The name of the database has recently changed from the "Employee Development System" to "UTrain".

Included herein are three hard copies and one electronic copy of this submittal. The hardcopy submittal contains pages or sections where text has been changed rather than copies of full attachments of the Permit. The electronic copy contains a reproduction of the hardcopy in portable document format (PDF) along with all the word processing files used to create the hardcopy.

AUG 18 2011

- 2 -

Notification of this modification will be sent to the NMED-HWB-maintained LANL facility mailing list in accordance with 40 CFR § 270.42(a)(1)(ii) within seven days of the transmittal of this permit modification request.

If you have comments or questions regarding this permit modification, please contact Gene Turner of my staff at (505) 667-5794 or Mark Haagenstad, LANS, at (505) 665-2014).



Kevin W. Smith
Manager

Enclosures

AUG 18 2011

- 3 -

cc w/enclosure:

Laurie King, Chief (6PD-N)
New Mexico/Federal Facilities Section
Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

cc w/o enclosure:

Steve Pullen
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

G. Rael, EPO, LASO
G. Turner, EPO, LASO
C. Beard, PADOPS, LANS, MS-A102
C. Cantwell, ADESHQ, LANS, MS-K491
M. Graham, ADEP, LANS, MS-M991
A. Grieggs, ENV-RCRA, LANS, MS-K490
M. Haagenstad, ENV-RCRA, LANS, MS-K404
R. Lechel, ENV-EAQ, LANS, MS-J593
J. Carmichael, ENV-RCRA, LANS, MS-E501
S. Cossey, ENV-ES, LANS, MS-G749
L. Sandoval, ENV-ES, LANS, MS-J593
ENV-DO File, LANS, MS-J978
Records Center, LASO
Official Contract File, LASO

EPO-26GT-241-366529

LA-UR-11-04184

Approved for public release;
distribution is unlimited.

<i>Title:</i>	Los Alamos National Laboratory Hazardous Waste Facility Permit Class 1 Permit Modification, July 2011
<i>Author(s):</i>	Angela M. Martinez, ENV-RCRA
<i>Intended for:</i>	New Mexico Environment Department- Hazardous Waste Bureau



Los Alamos National Laboratory, an affirmative action/equal opportunity employer, is operated by the Los Alamos National Security, LLC for the National Nuclear Security Administration of the U.S. Department of Energy under contract DE-AC52-06NA25396. By acceptance of this article, the publisher recognizes that the U.S. Government retains a nonexclusive, royalty-free license to publish or reproduce the published form of this contribution, or to allow others to do so, for U.S. Government purposes. Los Alamos National Laboratory requests that the publisher identify this article as work performed under the auspices of the U.S. Department of Energy. Los Alamos National Laboratory strongly supports academic freedom and a researcher's right to publish; as an institution, however, the Laboratory does not endorse the viewpoint of a publication or guarantee its technical correctness.

Table D-1
Response Groups and Agencies Available to the
Emergency Management Group for
Guidance and/or Emergency Assistance

Facility^a-Controlled Response Group	Telephone	Responsibilities
Health Physics Personnel	665 -7797	Provides routine guidance on radiological decontamination. Provides routine site evaluation and monitoring to determine the nature and extent of contamination (radiological).
Occupational Medicine	667-0660	Provides emergency medical treatment.
Industrial Hygiene and Safety Personnel	606-0295 667-5231	Provides guidance on industrial hygiene equipment and operational safety. Provides routine site evaluation/support field testing to determine the nature and extent of contamination (chemical).
Contractor Assurance Office	665-8206	Reports occurrences and tracks follow-up actions.
Hazardous Materials Response (HAZMAT)	665-5237	Provides emergency site evaluation/field monitoring (chemical and radiological). Specifies protective clothing and equipment. Dispatches Hazardous Materials Response Team. Provides support for chemical, radiological, hazardous, and mixed waste incidents and decontamination of responders and response equipment.
Meteorology & Air Quality Personnel	665-8855 667-6952	Provides information on meteorological conditions.
Water Quality and Hydrology Personnel	667-0666 or 665-0453	Provides information on hydrologic conditions.
Hazardous Waste Compliance Personnel	667-0666 or 665-0453	Provides guidance on regulatory requirements. Provide guidance on proper treatment, storage, and off-site shipment of hazardous and mixed waste. Conducts field surveys to determine spread of contamination

Facility ^a -Controlled Response Group	Telephone	Responsibilities
		and adequacy of cleanup.
Ecology Personnel	665-8855667-6952	Provide information on biotic conditions.
Security Personnel	667-4531	Provide traffic control and security.
Maintenance and Site Services	667-5702	Dispatches maintenance personnel and equipment. Assists in waste cleanup under direction of the Recovery Manager
TA-55 Operations Division	667-3030	Provides initial emergency site evaluation at Technical Area (TA) 55 and conducts activities related to the prevention, notification, and control of emergencies at TA-55. In the event of an emergency at TA-55, monitors for leaks, pressure buildup, gas generation, or equipment ruptures, if necessary. Maintains and operates TA-55 Emergency Response Team. Writes TA-55 emergency plans and procedures.
Dynamic and Energetic Materials Division	667-5653	Provides information and/or assistance during emergencies at TA-14, TA-15, TA-36, and TA-39.
Los Alamos County Fire Department	911 662-8301	Dispatches firefighting personnel and equipment and provides Emergency Medical Services.
Los Alamos County Police Department	662-8222	Provides traffic control on public access roads.
Los Alamos Medical Center ^c	662-4201	Provides medical services. Provides and maintains Emergency Room.
Facility-controlled Response Group; Maintenance services	667-5702	Dispatches maintenance personnel and assists in waste cleanup under the direction of the Recovery Manager

^a Los Alamos National Laboratory.

^c Medical services related to hazardous and mixed waste injuries are provided under the direction of HSR-2.

consists of supervised and documented training focused primarily on procedures performed by individual workers. Each of these types of training is described in Sections F.2.1 through F.2.3.

The Permittees shall ensure that all Facility employees and contract and support personnel who handle hazardous and/or mixed waste at permitted units receive the appropriate level of training within six months of their date of hire or transfer for work at a permitted unit. The Permittees shall not allow personnel to work in unsupervised waste handling positions at permitted units until they have successfully completed the appropriate level of training for their positions and responsibilities.

The Permittees shall ensure that records of Facility-wide training currently sponsored or administered by central training personnel are entered by that group into ~~the UTrain Employee Development System (EDS)~~, the official Facility training database, and that these records document that the required training has been successfully completed by the worker. The Permittees shall retain training records of former workers in accordance with Permit Section 2.12.2.

The Permittees shall ensure that the Facility-wide training program depicted in Table F-1 is carried out by the Permittees' central training personnel. Table F-1 includes a listing of the relevant training courses, a summary of topics, and a designation of the relevant courses for each job category. Categories of workers presented in Table F-1 include permitted unit hazardous/mixed waste workers, managers and supervisors of permitted unit hazardous/mixed waste workers, emergency responders, and uncontrolled area potential release site workers. Table F-2 summarizes the components of permitted unit specific training and OJT that workers receive, as applicable.

Permitted unit hazardous/mixed waste workers are responsible for handling hazardous/mixed wastes at a permitted unit. In addition, they are responsible for assisting in permitted unit spill and emergency response activities, as required.

Managers and supervisors of permitted unit hazardous/mixed waste workers are directly responsible for day-to-day operations related to permitted unit waste management activities. They are also responsible for assuring that personnel safety and training requirements are met.

Emergency Responders are trained emergency response personnel who respond to emergencies involving hazardous and/or mixed wastes. Emergency Responders also provide support for emergency response activities.

Uncontrolled Area Potential Release Site Workers conduct investigations and remedial activities at potential release sites. They are also responsible for proper waste management from generation to disposal, including waste characterization, treatment, and storage.

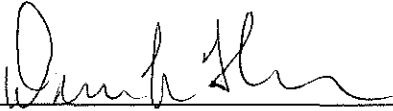
The Permittees shall review course content at least annually and shall update it as required to keep materials current with hazardous waste management regulations. The Permittees shall maintain training materials of Facility-wide training courses on file in the ES&H Training Center

Document: LANL Class 1 Permit Modification

Date: July 2011

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with 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.



8/15/11

Dennis L. Hjeresen
Division Leader
Environmental Protection Division
Los Alamos National Laboratory
Operator

Date Signed



8/18/2011

Kevin W. Smith
Manager, Los Alamos Site Office
National Nuclear Security Administration
U.S. Department of Energy
Owner/Operator

Date Signed



DEPARTMENT OF ENERGY
National Nuclear Security Administration
Los Alamos Site Office
Los Alamos, New Mexico 87544



AUG 18 2011

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

COPY



John Kieling, Manager
RCRA Permits Management Program
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Dear Mr. Kieling:

Subject: Transmittal of Technical Area 3 and Technical Area 55 Class 1 Permit Modifications to the Los Alamos National Laboratory Hazardous Waste Facility Permit, EPA ID No. NM0890010515

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature * <i>U. Boros</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>U. Boros</i> C. Date of Delivery <i>8/18/11</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>	
<p>1. Article Addressed to: <i>Mr. John Kieling Hazardous Waste Bureau New Mexico Environmental Dept. 2905 Rodeo Park Drive East Bldg 1 Santa Fe, NM 87505-6303</i></p>		<p>3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number (Transfer from service label)</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

Los Alamos National Laboratory Hazardous Waste Facility Permit, EPA ID No. NM0890010515. The revisions to Attachment E, and

New Mexico. The Class 1 Permit with 40 CFR §

enclosed pages of the Permit. The revisions to the Permit. The changes to Attachment A-3-29 in more detail, and clarity.

removes the following statement, "The alarm system is interrupted when the paging telephone system is activated to allow personnel to hear the announcement." This modification does not change any emergency procedures or equipment at TA-3. Changes within Section A.5 of Attachment A include the removal of the description of a rectangular strip at the container storage pad and dimension corrections for the container storage unit at TA-55-4, K13. The modification in Attachment E removes the word "monthly" and revises the statement to reiterate that standards are followed. The modification in Attachment G.18 revises the dimensions of the container storage unit at TA-55-4, B40 for correction purposes only.