



ESHID-600526

Environmental Protection Division
Environmental Compliance Programs (ENV-CP)
PO Box 1663, K490
Los Alamos, New Mexico 87545
(505) 667-0666

National Nuclear Security Administration
Los Alamos Field Office, A316
3747 West Jemez Road
Los Alamos, New Mexico, 87545
(505) 667-5794/Fax (505) 667-5948

Date: **JUL 07 2015**
Symbol: ENV-DO-15-0131
LA-UR: 15-23536
Locates Action No.: N/A

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

Dear Mr. Kieling:

Subject: Notification of Class 1 Modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit Inspection Plan, EPA ID # NM0890010515

The purpose of this letter is to notify the New Mexico Environment Department's Hazardous Waste Bureau (NMED-HWB) of a Class 1 permit modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit). This Permit was issued to the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), the Permittees, in November 2010. The permit modification provides revisions to Attachment E, *Inspection Plan*.

The proposed modification has been prepared in accordance with the Code of Federal Regulations [CFR], Title 40 (40 CFR) § 270.42(a) and 270.42, Appendix 1 (A)(1). This modification also clarifies general text as well as adds references from applicable sections of the permit throughout the Attachment E.

This permit modification includes this letter and two enclosures. Enclosure 1 contains a description of the permit modification and text edits of Attachment E in redline strike-out. Enclosure 2 contains a signed certification page. 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 full attachments of the Permit. The electronic copy contains a reproduction of the hardcopy in portable document format (PDF) and the word processing files used to create the hardcopy.

Upon submittal of this Class 1 permit modification, the modification will become effective and notice 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 transmittal of this permit modification.

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

Sincerely,

Sincerely,



Alison M. Dorries
Division Leader
Environmental Protection Division
Los Alamos National Security LLC



Kimberly Davis Lebak
Manager
Los Alamos Field Office
U.S. Department of Energy

AMD:KDL:TD/lm

Enclosures: (1) Description of proposed changes and redline of Attachment E, Inspection Plan
(2) Certifications

Cy: Laurie King, USEPA/Region 6, Dallas, TX, (E-File)
Dave Cobrain, NMED/HWB, Santa Fe, NM, (E-File)
Tim Hall, NMED/HWB, Santa Fe, NM, (E-File)
Peter Maggione, LASO-OOM, (E-File)
Gene E. Turner, LASO-NS-LP, (E-File)
Kirsten Laskey, LASO-SUP, (E-File)
Jordan Arnsward (LASO-NS-PI), (E-File)
Craig S. Leasure, PADOPS, (E-File)
Amy E. De Palma, PADOPS, (E-File)
Michael T. Brandt, ADESH, (E-File)
Raeanna Sharp-Geiger, ADESH, (E-File)
Alison M. Dorries, ENV-DO, (E-File)
Rick A. Alexander EWMO-DO, (E-File)
James S. Clemmons, LTP, (E-File)
Randy Erickson, ADEP, (E-File)
Mark P. Haagenstad, ENV-CP, (E-File)
Tammy D. Diaz, ENV-CP, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
locatesteam@lanl.gov, (E-File)
rcra-prr@lanl.gov, (E-File)
epccat@lanl.gov, (E-File)
env-correspondence@lanl.gov, (E-File)



COPY



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RECEIVED

JUL -7 2015

NMED
Hazardous Waste Bureau

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ENCLOSURE 1

Description of proposed changes and redline of
Attachment E, Inspection Plan

ENV-DO-15-0131

LA-UR-15-23536

Date:

JUL 07 2015

Permit Modification Notification

This document contains a Class 1 Permit Modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit) issued to the Department of Energy and the Los Alamos National Security, LLC, (LANS) collectively known as the Permittees, in November 2010. All proposed changes are shown in red text for Permit Attachment E.

Permit Modification Summary

The purpose of this permit modification submittal is to add two inspections required by the Permit to the Inspection Plan and to add language that references applicable parts of the Permit. Inspection schedules and forms have been added to Attachment E for the following: the TA-54 Dome 215 holding tank and the TA-50-69 WCRRF storm water drainage swales. These inspections are already incorporated in Permit Sections 3.12, *TA-54 Container Storage Requirements* and 3.11, *TA-50 Container Storage Requirements*.

Basis

This modification incorporates revisions administrative in nature in accordance with Code of Federal Regulations, Title 40 §270.42 (a) and §270.42, Appendix I (A)(1).

Permit Changes

The Hazardous Waste Facility Inspection Record Form was updated to add a revision date of July 2015.

Instructions (Parts I-III)

Part I of the Record Form was modified to remove the statement "*most recent Los Alamos National Laboratory (LANL) General Part B Permit Application or...*" and to add "*...(Attachment E) or in the most recent permit application for interim status units...*" as well as "*All boxes within the column for the day of the inspection are required to be filled. However, a column may be left blank on days when operations are not conducted*". These changes are administrative and are intended to provide clarification.

Part I of the Record Form instructions, Item 6 was modified to add the word "Unit" to the statement "No Unit Use" which reflects what is actually stated in the Inspection Record Form.

Part I of the Record Form instructions, Item 7 (c), was changed to add the following language: *If any hazardous or mixed waste is subsequently placed in the tank for any reason, a full inspection must be performed immediately and then subsequently according to the appropriate inspection plan.*

Part I of the Record Form, Item 9 was modified to include the following language as stated in Permit Section 2.5.1: *Warning signs at all gates and perimeter fences, where present around permitted units, must be posted in bilingual (in English and Spanish), must be visible from a distance of at least*

25 feet and from all angles. Warning signs along shared boundaries with the Facility's permitted units and the pueblo of San Ildefonso shall be posted in the appropriate dialect of Tewa, equivalent to the bilingual warning signs (See Permit Section 2.5.1 (Warning Signs))."

Part I of the Record Form, Item 10 was modified to include the following language as stated in Permit Section 2.5: *"(e.g., attendants, locks, prohibited or controlled roadway access). (See Permit Section 2.5 (Security))."*

Part 1 of the Record Form, Item 11 was modified to provide an example for "deterioration". The language was modified to state *"Inspection includes structures and base materials and malfunctions, deteriorations (e.g., tears in dome fabric), operator errors, and discharges."*

Part 1 of the Record Form, Item 12 was modified to reference applicable language from Attachment D (Contingency Plan) into the list of instructions in Attachment E. The language added states *"(Attachment D (Contingency Plan) of the Permit includes a list of required equipment specific to each permitted unit)."*

Part 1 of the Record Form, Item 15, was modified to include the following language *"(Note: Dome 224 must be checked for liquids even though the liner is not considered secondary containment.)."*

Part 1 of the Record Form, Item 16 was modified to state the following *"...including doorways or entry ways (Permit Section 2.6.1)."*

Part 1 of the Record Form, Item 19 was modified to state the following: *"All containers holding mixed waste shall be labeled "Radioactive" and all containers with any amount of free liquids must be labeled as such."*

Part 1 of the Record Form, Item 20 was modified to include the following language *"(e.g., when ignitable or corrosive wastes are segregated by signage or other physical boundary or marking)."*

Part II of the Record Form, Item 32, was modified to add the following language *"Printouts from databases or other documentation may be included as necessary."*

Part III of the Record Form, Item 33 was modified to state *"Document informational comments and any status associated with the current inspection that does not require specific regulatory action or remedies applicable to the LANL Hazardous Waste Facility Permit or specific permit application (in the case of interim status units)."*

TA-54 Attachment E Inspection Plan

TA-54, Attachment E, Inspection Plan was revised to include the Area L, TA-54 Dome 215 Holding Tank as part of the inspection plan. The inspection requirements for the tank are already included in

Permit Section 3.12, *TA-54 Container Storage Requirements, Area L*. This section was also modified to include the monthly inspection form for the holding tank.

TA-50 Attachment E, Inspection Plan

A new section titled *TA-50 Attachment E, Inspection Plan*, has been added to the Inspection Plan, this plan includes inspection requirements for the drainage swales located south of the permitted unit between the permitted unit and Material Disposal Area (MDA) C. A second drainage swale is located on the west side of the permitted unit. The inspection requirements for the TA-50 WCRRF stormwater drainage are already included in Permit Section 3.11.3. The annual inspection form for the stormwater drainage has also been included in this section.

ATTACHMENT E
INSPECTION PLAN

HAZARDOUS WASTE FACILITY INSPECTION RECORD FORM

¹ FACILITY:	² Site ID #:	TREATMENT, STORAGE, OR DISPOSAL UNIT (TSD)	³ START DATE:	⁴ END DATE:
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⁵ Containers Landfill Chemical Treatment Tank Miscellaneous Unit (OB/OD, Cementation)

PART I Enter condition of the item inspected (i.e. OK, NA [Not Applicable], or AR [Action Required]) in column for day inspected.

ITEM	INSPECTED FOR:	MON	TUE	WED	THU	FRI	SAT	SUN
⁶ NO UNIT USE	No waste stored							
⁷ NO WASTE HANDLING	No waste handled (see instructions)							
All TSDs								
⁸ COMMUNICATIONS EQUIPMENT	Availability and proper operating condition							
⁹ WARNING SIGNS	Posted, legible, and bilingual							
¹⁰ SECURITY	Good condition of fences, gates, locks, and other access control equipment							
¹¹ WORK SURFACES/ FLOORS/ROADS	Absence of conditions that could lead to an accident or spill							
¹² SPILL/FIRE EQUIPMENT	Present, appropriate, and in proper operating condition							
¹³ EYEWASHES/ SAFETY SHOWERS	Proper operating condition							
¹⁴ WIND SOCK	Proper operating condition and functional							
¹⁵ SECONDARY CONTAINMENT	Integrity— No standing water/waste, erosion, or signs of a spill							
¹⁶ (UN)LOADING AREA	No spills or deterioration							

¹⁷ RUN-ON/OFF CONTROL	Integrity—no ponding, erosion, or damage							
Container Storage Units and/or Tanks (see instructions)								
¹⁸ COVERS/LIDS OF CONTAINERS	Closed and secured properly							
¹⁹ LABELS	Proper with start date, present & legible							
²⁰ COMPATIBILITY	Separated according to compatibility							
²¹ INTEGRITY	No leakage, corrosion, or damage							
²² AISLE SPACE/STACKING	Appropriateness and adequacy							

HAZARDOUS WASTE FACILITY INSPECTION RECORD FORM

FACILITY:	Site ID #:	START DATE:	END DATE:
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ITEM	INSPECTED FOR:	MON	TUE	WED	THU	FRI	SAT	SUN
²³ PALLETS AND RAISED CONTAINERS	Absence of conditions that could result in failure							
²⁴ TANK SYSTEMS	Discharge controls and fill level and no corrosion or leakage							

Other TSDs

²⁵ SHAFTS/LANDFILL COVERS	Presence and condition of cover							
²⁶ OPEN BURNING UNITS	Condition of cover, and no erosion, leakage, or damage							
²⁷ OPEN DETONATION UNITS	Unit and vegetation condition and no erosion							
²⁸ CEMENTATION UNITS	Structural integrity and condition of equipment and systems							

	MON	TUE	WED	THU	FRI	SAT	SUN
²⁹ DATE							
³⁰ TIME							
³¹ INSPECTOR(S)							

Part II For any AR (Action Required) in PART I, describe below: action required, action taken, status, date, and time of action. Attach additional sheets if necessary. If more than one action is required, number each AR.

32

Part III Comments.

33

HAZARDOUS AND MIXED WASTE FACILITY INSPECTION RECORD FORM

¹ FACILITY:	² Site ID #:	TREATMENT, STORAGE, OR DISPOSAL UNIT (TSD)	³ START DATE:	⁴ END DATE:				
⁵ <input type="checkbox"/> Containers <input type="checkbox"/> Landfill <input type="checkbox"/> Chemical Treatment <input type="checkbox"/> Tank <input type="checkbox"/> Miscellaneous Unit (OB/OD, Cementation)								
PART I- Enter condition of the item inspected (i.e. OK, NA [Not Applicable], or AR [Action Required]) in column for day inspected.								
ITEM	INSPECTED FOR:	MON	TUE	WED	THU	FRI	SAT	SUN
All TSDs								
⁶ NO UNIT USE	No waste stored							
⁷ NO WASTE HANDLING	No waste handled/treated (see instructions)							
⁸ COMMUNICATIONS EQUIPMENT	Availability and proper operating condition							
⁹ WARNING SIGNS	Posted, legible, and bilingual							
¹⁰ SECURITY	Good condition of fences, gates, locks, and other access control equipment							
¹¹ WORK SURFACES/ FLOORS/ROADS	Absence of conditions that could lead to an accident or spill							
¹² SPILL/FIRE EQUIPMENT	Present, appropriate, and in proper operating condition							
¹³ EYEWASHES/ SAFETY SHOWERS	Proper operating condition							
¹⁴ WIND SOCK	Proper operating condition and no damage							
¹⁵ SECONDARY CONTAINMENT	Integrity- No standing water/waste, erosion, or other signs of a spill							
¹⁶ (UN)LOADING AREA	No spills or deterioration							
¹⁷ RUN-ON/OFF CONTROL	Integrity- no ponding, erosion, or damage							
Container Storage Units and/or Tanks (see instructions)								
¹⁸ COVERS/LIDS OF CONTAINERS	Closed and secured properly							
¹⁹ LABELS	Proper labels with start date, present & legible							
²⁰ COMPATIBILITY	Separated according to compatibility							
²¹ INTEGRITY	No leakage, deterioration, corrosion, or damage							
²² AISLE SPACE/STACKING	Appropriateness and adequacy							
²³ PALLETS AND RAISED CONTAINERS	Absence of conditions that could result in failure							
²⁴ TANK SYSTEMS	Discharge controls and fill level and no corrosion or leakage							
Other TSDs								
²⁵ SHAFTS/LANDFILL COVERS	Presence and condition of cover							
²⁶ OPEN BURNING UNITS	Condition of cover, and no erosion, leakage, or deterioration							
²⁷ OPEN DETONATION UNITS	Unit and vegetation condition and no erosion							
²⁸ CEMENTATION UNITS	Structural integrity and condition of equipment and systems							

HAZARDOUS AND MIXED WASTE FACILITY INSPECTION RECORD FORM

FACILITY:	Site ID #:	START DATE:	END DATE:
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	MON	TUE	WED	THU	FRI	SAT	SUN
²⁹ DATE							
³⁰ TIME							
³¹ INSPECTOR(S)							

Part II- For any AR (Action Required) in PART I, describe below: action required, action taken, date, and time of action. Attach additional sheets if necessary. If more than one action is required, number each AR.

³²

Part III- Comments.

³³

Part I

Weekly and daily inspection of TSDs will be conducted in accordance with the inspection plan in ~~most recent Los Alamos National Laboratory (LANL) General Part B Permit Application or the LANL Hazardous Waste Facility Permit, (Attachment E) or in the most recent permit application for interim status units~~, as appropriate. Not all items in this section will apply to all facilities. An “NA” (not applicable) is required if the item does not apply. Facilities may shade parts of the form to indicate items that need to be completed only on a weekly basis. Holidays and Laboratory closures ~~can~~ may also be noted (e.g., by writing “H” (for holidays) or “Closed” in the first box and drawing a line all the way down the page).

All boxes within the column for the day of the inspection are required to be filled. However, a column may be left blank on days when operations are not conducted.

1. Location information, including TA, building, room (if applicable), and any other location descriptors that may be necessary (e.g., TA-59-3-114 or TA-59-1-S, Dock).
2. A site identification number is assigned to every facility by the Resource Conservation and Recovery Act (RCRA) compliance personnel. This allows for ease in identification.
3. Start date of Monday for the week of record.
4. End date of Sunday for the week of record.
5. Check the appropriate box for the type of operation. Several boxes may be checked, if necessary, for those locations where inspections are combined on a single sheet. You must have prior approval from RCRA compliance personnel to combine inspections for more than one unit.
6. For container storage units only – “NO UNIT USE” may be checked (or marked “OK”) if waste was not stored at the unit for the week in question. When this box is checked, the individual responsible for the inspection must only complete this box, the items related to site location (Items 1-5), and the inspector name section for that week (Items 29-31). If any hazardous or mixed waste is subsequently placed at the site for any reason, a full inspection must be performed immediately and then subsequently according to the appropriate inspection plan.
7.
 - a. At a container storage unit if waste is in storage but no waste is handled at the unit for the week– “NO WASTE HANDLING” may be checked, but a weekly inspection in accordance with the appropriate inspection plan must be conducted.
 - b. If a treatment unit is not conducting treatment for the week – “NO WASTE HANDLING” may be checked, but a weekly inspection in accordance with the appropriate inspection plan must be conducted.
 - c. For a tank storage system unit, if no waste is being stored and the tank system is empty, “NO WASTE HANDLING” may be checked. However, a weekly inspection in accordance with the appropriate inspection plan must be conducted (If any hazardous or mixed waste is subsequently placed in the tank for any reason, full inspection must be performed immediately and then subsequently according to the appropriate inspection plan.

8. Communication equipment must be inspected in order to ensure availability and proper operating condition for each piece of equipment (e.g., telephones, radios, and alarms). Equipment must be present in accordance with the appropriate contingency plan.
9. Required signs must be legible and prominently posted in accordance with 40 CFR § 264.14(c) and/or the permit as applicable. Warning signs at all gates and perimeter fences, where present around permitted units, must be posted in bilingual (in English and Spanish), must be visible from a distance of at least 25 feet and from all angles. Warning signs along shared boundaries with the Facility's permitted units and the pueblo of San Ildefonso shall be posted in the appropriate dialect of Tewa, equivalent to the bilingual warning signs (See Permit Section 2.5.1 (Warning Signs)). Signs at large outdoor storage areas will be inspected no less than two times per year to evaluate for deterioration.
10. Site security must be verified. Items such as fences, gates, locks, and other access control equipment (as appropriate) should be checked for proper operating condition or mitigative measures (e.g., attendants, locks, prohibited or controlled roadway access). (See Permit Section 2.5 (Security))
11. Roads, process floors, and other work surfaces at TSDs must be inspected for any conditions that could lead to a spill or an accident. Inspection includes structures and base materials and malfunctions, deterioration (e.g., tears in dome fabric), operator errors, and discharges.
12. Hazardous or mixed waste TSDs must have fire control and spill control equipment. Equipment must be present, in proper operating condition, and appropriate for the material in question. Hose bibs, where present, should be inspected for proper operating condition and adequate pressure. Outdoor fire-water supply systems must be checked for freezing and damage. Equipment must be inspected and present in accordance with the appropriate inspection and contingency plans. (Attachment D (Contingency Plan) of the Permit includes a list of required equipment specific to each permitted unit.)
13. Where present, eyewashes and safety showers must be inspected to ensure proper operating condition or that scheduled routine inspections have been conducted and documented as indicated at the eyewash or safety shower. Outdoor locations must be checked for freezing.
14. Wind socks, where present at outside TSDs, must be inspected to ensure that they are in proper operating condition/functional and checked for damage.
15. Secondary containment structures for hazardous or mixed waste operations must be inspected to verify proper operating condition and to ensure adequate capacity. Structures must also be inspected for the presence of standing water or hazardous/mixed waste or any other indication of a spill (i.e. discolored vegetation, soil, or concrete). For certain operations, secondary containment includes inspection of gloves, gloveboxes, hoods, and ventilation systems. For locations where inflatable "Porta Berms" are used, inspectors must ensure that they are adequately inflated. All monitoring and leak detection systems must also be checked. (Note: Dome 224 must be checked for liquids even though the liner is not considered secondary containment.)
16. Loading and unloading areas must be inspected daily when in use for signs of damage or deterioration that may lead to an accident or spill. This includes asphalt covered areas and areas where containers or tanks are handled or the contents thereof are transferred, including doorways or entry ways (Permit Section 2.6.1).

17. Run-on and runoff controls, wherever present, must be checked. The integrity should be inspected by looking for signs of damage, erosion, ponding, or any other conditions that could lead to a spill or an accident.
18. All tanks and containers used for storing hazardous or mixed waste must have the cover or lid securely in place. Containers are not considered to be closed until the lid/cover is fastened in the manner the manufacturer originally intended. However, the lid may be off of a tank or container while waste is being placed into or removed from a container.
19. All containers and tanks containing hazardous or mixed waste must be labeled with the words "HAZARDOUS WASTE," and EPA Hazardous Waste Numbers or hazardous waste constituents. They must also be marked with a legible accumulation start date. All containers must be dated when they arrive at the facility and no hazardous or mixed waste may be stored for over one year, unless specifically exempted. All containers holding mixed waste shall be labeled "Radioactive" and all containers with any amount of free liquids must be labeled as such.
20. All hazardous or mixed waste containers holding materials that may be incompatible with any other materials at that location must be separated from those materials by dikes, berms, or other physical barriers to prevent a possible reaction (e.g., when ignitable or corrosive wastes are segregated by signage or other physical boundary or marking).
21. All containers and tanks must be checked for structural integrity, leakage, corrosion, or damage that may impact integrity. This includes checking the condition of all construction materials, fixtures, seams, and auxiliary equipment. There are special inspection criteria for tank systems (see Item 24 below).
22. Adequate aisle space must be maintained to allow for inspection and for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency. Containers of hazardous and mixed waste must be stored in a manner that ensures a minimum 2-foot aisle space and containers may not be stacked more than 3 high, unless otherwise specified for the facility (*i.e.* some units within the LANL Hazardous Waste Facility Permit must have an aisle space of 28 inches and only 55 gallon drums may be stored three high). Please consult RCRA compliance personnel for permit related questions.
23. Hazardous or mixed waste containers stored at TSDs must be on pallets, elevated, or otherwise raised to be protected from contact with accumulated liquid.

TANKS SYSTEMS:

24. For tank systems used for treatment or storage of hazardous or mixed waste, all aboveground portions of the tank system, including any and all ancillary plumbing, must be inspected for signs of leaking, corrosion, deterioration, or improper operation. Tanks must be operated with a minimum freeboard of 6 inches. If the tank system includes discharge controls, overtopping controls, tank level alarms, or other monitoring equipment, including leak detection equipment, all controls and relevant data must be checked to ensure they are operating properly and that operation is within design specifications for the system.

SHAFTS:

25. Shafts used for retrievable storage should have their covers securely in place and the surrounding area should show no evidence of erosion. Disposal shafts and shafts used for retrievable storage should have their covers securely in place and, during waste handling operations, guard rails must be installed and in good condition. Landfill covers must be inspected at least weekly and after storms for evidence of erosion, subsidence, and water intrusion.

OPEN BURNING UNITS:

26. Open burning units must be inspected for deterioration, leakage, vegetation in the immediate vicinity that could catch fire, and assure that the unit is covered when not in use. Inspectors must also look for explosives and debris not consumed during the burn.

OPEN DETONATION UNITS:

27. Open detonation units must be inspected for deterioration, leakage, or vegetation in the immediate vicinity that could catch fire. Inspectors must also look for explosives and debris not consumed by the detonation.

STABILIZATION UNITS:

28. The structural integrity and condition of equipment and systems must be inspected on stabilization units. Units must also be inspected for signs of leaking, corrosion, deterioration, or improper operation.

FOR ALL INSPECTIONS:

29. Record of the date of the current inspection. Only one date is given for each inspection, whether a team or an individual performs the inspection.

30. Record of the time of the current inspection. Only one time is given for each inspection, whether a team or an individual performs the inspection.

31. Legible and/or printed name of each inspector involved in the current inspection.

PART II

List any action required.

32. Document any action taken immediately and express any plans for future action to be taken. Also, ensure that previous ARs are closed out with completed actions described. If the AR has not been resolved, ensure that it is carried over to the current inspection. Status should be provided for both open and closed items. If necessary, attach additional sheets to inspection record form to efficiently cover the action taken or required. Printouts from databases or other documentation may be included as necessary. Initial any information or comments added, and if more than one action is required or conducted, assign a number to each AR.

PART III

Identify any comments.

33. Document informational comments and any status associated with the current inspection that does not require specific regulatory action or remedies applicable to the LANL Hazardous Waste Facility Permit or specific permit application (in the case of interim status units).

TA-54
ATTACHMENT E
INSPECTION PLAN

TA-54
ATTACHMENT E
INSPECTION PLAN

This Attachment Section presents additional inspection requirements specific to the container storage units at Technical Area (TA) 54. The Permittees shall conduct inspections at the frequency specified in the general inspection Section to identify problems in time to correct them before they harm human health or the environment.

E.1 INSPECTION REQUIREMENTS FOR TRUPACT-II CONTAINERS

The Permittees shall visually inspect waste containers prior to their placement in the TRUPACT-II containers to ensure their integrity. The inspection shall include a close examination of the cover and closure devices for visible cracks, holes, gaps, or other open spaces into the interior of the waste container when the cover and closure devices are secured in the closed position. The TRUPACT-II shall be loaded with waste containers and sealed with a locking-ring closure mechanism. After the TRUPACT-II has been sealed, the Permittees shall inspect the outside of the TRUPACT-II to ensure its integrity and that there has been no human intervention.

E.2 INSPECTION REQUIREMENTS FOR TA-54 DOME 215 HOLDING TANK

The 10,000 gallon holding tank is located at Area L, Dome 215. The tank is used to collect liquid that may result from fire-suppression activities and that is in excess of the capacity inside the ring wall located around the dome to prevent run-on into the dome. The Permittees shall inspect the storage tank for any detectable fluids each month. If any fluids are detected in the holding tank, the Waste Management Coordinator and the Shift Operations Manager to ensure that a chemical analysis of the fluid is performed and the fluid is removed within 3 days. The following inspection requirements should be applied to the monthly inspections conducted on the 10,000 gallon holding tank and shall be documented on separate forms.

MONTHLY AREA L, DOME 215 HOLDING TANK INSPECTION FORM

Month	Fluids detected in Dome 215 holding tank?	Printed Name of Inspector	Signature of Inspector	Date of Inspection
January	<input type="checkbox"/> YES <input type="checkbox"/> NO			
February	<input type="checkbox"/> YES <input type="checkbox"/> NO			
March	<input type="checkbox"/> YES <input type="checkbox"/> NO			
April	<input type="checkbox"/> YES <input type="checkbox"/> NO			
May	<input type="checkbox"/> YES <input type="checkbox"/> NO			
June	<input type="checkbox"/> YES <input type="checkbox"/> NO			
July	<input type="checkbox"/> YES <input type="checkbox"/> NO			
August	<input type="checkbox"/> YES <input type="checkbox"/> NO			
September	<input type="checkbox"/> YES <input type="checkbox"/> NO			
October	<input type="checkbox"/> YES <input type="checkbox"/> NO			
November	<input type="checkbox"/> YES <input type="checkbox"/> NO			
December	<input type="checkbox"/> YES <input type="checkbox"/> NO			

Comments: _____

Reviewed By: _____ / _____ / _____
 SOM/Designee (print) Signature Z# Date

TA-50
ATTACHMENT E
INSPECTION PLAN

WCRRF STORMWATER DRAINAGE

ATTACHMENT E

INSPECTION PLAN

This Attachment Section presents additional inspection requirements applicable to the waste management units at Technical Area (TA) 50-69. The Permittees shall conduct inspections at the frequency specified in the General Inspection Section to identify problems in time to correct them before they harm human health or the environment.

E.1 WCRRF STORMWATER DRAINAGE

The WCRRF storm water drainage swales located in the vicinity are utilized to divert storm water away from the TA-50-69 pad. One drainage swale is located just south of the permitted unit or, between it and the Material Disposal Area (MDA) C. A second drainage swale is located on the west side of the permitted unit between Pecos Drive and the TA-50 fence line.

E.1.1 STORAGE TANK SYSTEM

The Permittees shall inspect the WCRRF storm water drainage annually. The drainage swales must be inspected for signs of deterioration to ensure that potential run-on is directed away from the facility for the following areas:

- South of TA-50-69 between TA-50-69 and Material Disposal Area (MDA) C
- West of TA-50-69 between Pecos Drive and the TA-50 fence line

ANNUAL WCRRF STORMWATER DRAINAGE INSPECTION FORM

Date: _____

Inspection	SAT / UNSAT
Drainage swales south of TA-50-69 between TA-50-69 and Material Disposal Area (MDA) C show no signs of deterioration and will direct potential stormwater away from the facility.	<input type="checkbox"/> SAT <input type="checkbox"/> UNSAT
Drainage swales west of TA-50-69, between Pecos Drive and the TA-50 fence line show no signs of deterioration and will direct potential stormwater away from the facility.	<input type="checkbox"/> SAT <input type="checkbox"/> UNSAT

Comments: _____

Performed By:

 Inspector Name (print) Signature Z# Date

Reviewed By:

 RCRA Compliance (print) Signature Z# Date

Reviewed By:

 SOM/Designee (print) Signature Z# Date

ENCLOSURE 2

Certifications

ENV-DO-15-0131

LA-UR-15-23536

Date: _____

JUL 07 2015

INTERNAL CERTIFICATION
ENVIRONMENTAL PROTECTION DIVISION

I certify under penalty of law that this document and all attachments were reviewed and approved 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 reviewing, 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.



Anthony R. Grieggs
Group Leader
Environmental Compliance Programs
Environmental Protection Division
Los Alamos National Laboratory

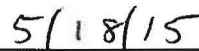
6/18/15
Date Signed

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.



Alison M. Dorries
Division Leader
Environmental Protection Division
Los Alamos National Laboratory
Operator



Date Signed



Kimberly Davis Lebak
Manager, Los Alamos Field Office
National Nuclear Security Administration
U.S. Department of Energy
Owner/Operator



Date Signed