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Environmental Compliance Programs (ENV-CP)**
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Los Alamos, New Mexico 87545
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**National Nuclear Security Administration
Los Alamos Field Office, A316**
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Date: DEC 21 2015
Symbol: ENV-DO-15-0358
LA-UR: 15-29550
Action Item No.: N/A

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

Dear Mr. Kieling:

Subject: Los Alamos National Laboratory Hazardous Waste Facility Permit Instances of Noncompliance and Releases for Fiscal Year 2015

The purpose of this letter is to transmit to the New Mexico Environment Department-Hazardous Waste Bureau a report required by Section 1.9.14 of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (the Permit). The report lists instances of noncompliance with the Permit and any releases at or from a permitted unit that did not pose a threat to human health or the environment. From October 1, 2014 through September 30, 2015 there were no releases within or from a permitted unit.

If you have questions regarding this report or would like to discuss in further detail, please contact Mark Haagenstad at (505) 665-2014 of Environmental Compliance Programs (ENV-CP), or Gene Turner, Los Alamos Field Office at (505) 667-5794.

Sincerely,

Anthony R. Grieggs
Group Leader
Environmental Protection Division
Los Alamos National Security, LLC

Sincerely,

Gene E. Turner
Environmental Permitting Manager
National Security Missions
Los Alamos Field Office
U.S. Department of Energy

ARG:GET:MPH:LRVH/lm

Enclosure: (1) Fiscal Year 2015 Reporting of Instances of Noncompliance and Releases Los Alamos
National Laboratory Hazardous Waste Facility Permit

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Douglas E. Hintze, EM-LA, (E-File)
David Nickless, EM-WM, (E-file)
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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.



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

12/17/15

Date Signed



Gene E. Turner
Environmental Permitting Manager, Los Alamos Field Office
National Nuclear Security Administration
U.S. Department of Energy
Owner/Operator

12/17/2015

Date Signed

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NMED
Hazardous Waste Bureau



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Dear Mr. Kieling:

Subject: Los Alamos National Laboratory Hazardous Waste Facility Permit Instances of Noncompliance and Releases for Fiscal Year 2015

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If you have questions regarding this report or would like to discuss in further detail, please contact Mark Haagenstad at (505) 665-2014 of Environmental Compliance Programs (ENV-CP), or Gene Turner, Los Alamos Field Office at (505) 667-5794.

Sincerely,

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Group Leader
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Environmental Permitting Manager
National Security Missions
Los Alamos Field Office
U.S. Department of Energy

ARG:GET:MPH:LRVH/lm

ENCLOSURE 1

**Fiscal Year 2015 Reporting of Instances of Noncompliance and
Releases Los Alamos National Laboratory
Hazardous Waste Facility Permit**

ENV-DO-15-0358

LA-UR-15-29550

Date: DEC 21 2015

Fiscal Year 2015 Reporting of Instances of Noncompliance and Releases

Los Alamos National Laboratory Hazardous Waste Facility Permit

Introduction

This report has been prepared by the US Department of Energy and Los Alamos National Security, LLC (DOE/LANS), collectively the Permittees, to meet a reporting requirement of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (the Permit). Permit Sections 1.9.13 and 1.9.14 require reporting of any non-threatening release of hazardous waste or constituents from or at a permitted unit, and all instances of noncompliance with the Permit. This report must be submitted by December 1 of each year, however, for Fiscal Year 2015, an extension was granted until December 22, 2015.

This report addresses releases and instances of noncompliance information from October 1, 2014 through September 30, 2015. None of the releases or incidents of noncompliance detailed within this report posed a potential threat to human health or the environment.

Facility Information

Owner and Operator:

United States Department of Energy
3747 West Jemez Road
Los Alamos, NM 87544

Co-Operator:

Los Alamos National Security, LLC.
Po Box 1663
Los Alamos, NM 87545

Facility:

Los Alamos National Laboratory
PO Box 1663
Los Alamos, NM 87545

Releases from or at a Permitted Unit

During this time frame (October 1, 2014 through September 30, 2015), there were no releases at or from a permitted unit.

Instances of Noncompliance with the Permit

From October 1, 2014 through September 30, 2015, there were four hundred twenty-one instances of noncompliance with the Permit; these occurrences are listed in Table 1. The majority of the occurrences are associated with inconsistencies in the operating record and container labeling issues. Other instances include missed notifications and correction of permit required records.

Additional instances of noncompliance for this time frame and from past activities at the facility were previously reported in communications dated October 21, 2014 (*Second Addendum, Reporting Additional Instances of Noncompliance with Hazardous Waste Facility Permit and Generator Requirements, Los Alamos National Laboratory, LA-UR-14-28034*); May 6, 2015 (*Transmittal of Nonconformance Report and Path Forward Approval for Duplicate Drum Number, LA-UR-15-21758*); and August 31, 2015 (*Self-Disclosure of Non-Compliances Resulting from the Extent of Condition Review, Los Alamos National Laboratory Hazardous Waste Facility Permit No. NM10890010515*). These self-disclosures of noncompliance were identified as part of a site-wide compliance assessment to discover compliance issues and develop systemic, institutional resolutions at permitted hazardous waste management units. Because of the extensive nature of these assessments and additional wall-to-wall inventories initiated as part of the assessments, many of the individual instances of noncompliance outlined in Table 1 were identified and resolution was provided in the documents identified above.

In fiscal year 2015, a complete wall-to-wall assessment of the storage units at TA-54, Area G was completed. The assessment was conducted to identify noncompliance with the LANL Hazardous Waste Facility Permit and to ensure the identification of discrepant waste items/containers so that an accurate operating record would be achieved. A deliberate and compliant restart of activities at the facility is being initiated. However, because the facility has been placed in warm standby conditions while safety basis compliance is established, activities at the facility are currently limited. Therefore, many of the instances of permit noncompliance are still awaiting resolution.

Corrective actions associated with these noncompliance issues have been developed. Characterization of the waste containers may include, but is not limited to: real time radiography, radiological assays and surveys, weighing, sampling and analysis and visual inspection. Preliminary characterization information will be used to create waste stream profiles to represent each potential waste stream. Existing, active waste stream profiles will be used where appropriate. New container numbers will be created where applicable, labels will be printed and applied to the waste containers, and the waste containers will be included in the waste inventory for each of the appropriate units. If necessary, the location where the individual containers are stored will be adjusted to ensure compliance with Permit requirements. Documentation in the facility operating record will be kept as appropriate. Once these steps have been completed, all instances of noncompliance will be resolved for waste containers in storage at TA-54, Area G.

The Permittees are currently working towards a carefully considered restart of operations at the TA-54, Area G facility. This restart includes developing additional qualifications and training requirements for waste management personnel to improve understanding and knowledge of requirements of the Permit. Additionally, the Laboratory is developing new waste management guidance tools and improving existing waste management guidance tools to ensure operations are compliant with the Permit. The Laboratory continues to work with waste generators and waste management personnel to identify and remediate instances of noncompliance with the Permit to prevent recurrence.

Table 1: Fiscal Year 2015 Noncompliance Report

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances of Noncompliance	Period of Noncompliance	Steps Taken to Resolve
10/12/2012	TA-54, Area G, Pad 6, Dome 153	During a routine inspection, it was observed that the fabric of the dome was deteriorating in places and allowing moisture to enter the dome. This is a noncompliance with Permit Section 2.6.2.	Not applicable	1	10/12/2012 - Ongoing	The fabric repair for this dome is currently on the maintenance schedule for fiscal year 2016.
4/15/2013	TA-54, Area L TA-54, Area G, Site-wide	Emergency evacuation alarms are inoperable and are required emergency equipment per Permit Section 2.10.1.	Not applicable	1	4/15/2013 - Ongoing	Although the alarm system has not been repaired, Permit Attachment D, Contingency Plan, lists several types of communication equipment for the units at TA-54, Areas L and G. These include emergency paging loudspeakers (public address system), alpha-numeric pagers, cell phones, two way radios, fire alarms, and telephones in several buildings in addition to the emergency evacuation alarms. When the alarms became inoperable, the TA-54 Operations Center alerted staff and activated substitute equipment including use of a public address (PA) system, pagers/cell phones, and radios. Notices are posted in the TA-54 Operations Center and signs are located within the areas. The system has not been repaired because while the repair procurement documentation and work package were being developed, lightning strikes caused more damage to the system. Moreover, the existing system has aged and replacement parts and external service providers are no longer available.
10/21/2014	TA-54, Area G, Pad 1	During a routine inspection, a white B-12 container was found without a label. This is a noncompliance with Permit Section 3.6(1).	One container	1	10/21/2014 - 10/27/2014	The container was correctly labeled as hazardous waste.
11/24/2014	TA-54, Area G, Pad 9, Dome 232	A single container was not adequately labeled with required information or documented in the facility operating record. This is a noncompliance of Permit Sections 3.6(1) and 2.12.2.	One container	1	11/24/2014 - 3/4/2015	The container was correctly labeled as hazardous waste and entered into the operating record.

Table 1: Fiscal Year 2015 Noncompliance Report

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances of Noncompliance	Period of Noncompliance	Steps Taken to Resolve
12/3/2014	TA-54, Area G	During wall-to-wall assessments, several containers (approximately 3,000) were previously identified as a potential issue to the NMED-HWB and have been cited as instances of noncompliance. These containers are identified as emptied transuranic waste parent containers that were generated during remediation and repackaging of transuranic waste. This noncompliance and the paths forward for reconciliation were previously shared with the NMED-HWB on December 9, 2014. This is a noncompliance of Permit Section 2.4.1.	Not applicable	93	12/03/2014 - Ongoing	The containers will be managed as originally communicated to the NMED-HWB on December 9, 2014 and as part of the corrective action plan referenced within this noncompliance report. Each container will be weighed and if the weight of container indicates a discrepancy to the weight of the empty control container, the discrepant container will be real-time radiographed. If the real-time radiography indicates that the container is not empty (contains homogeneous solids), the parent container EPA Hazardous Waste Numbers will be applied to the waste container and the container will be flagged for remediation prior to disposition off-site. If it is discovered that the empty container is lead-lined, it will be managed as hazardous waste. At this time approximately 93 containers have been identified to contain either residual lead or homogeneous solids with another 5-10% of the remaining 2,000 waste containers that must be assessed are expected to be either lead lined or contain homogeneous solids. This process is ongoing because waste operations at TA-54 are implementing compliant restart activities.
1/5/2015	Not applicable	Correspondence from the Permittees to the NMED-HWB was not placed in the LANL Public Reading Rooms (electronic or hardcopy) within the 10 days as required by Permit Section 1.10.	Not applicable	1	12/30/2014 - 1/06/2015	Correspondence was placed in the LANL Public Reading Rooms. Winter closure schedule increased the length of time for submittal to the LANL Public Reading Rooms. More careful planning will be undertaken to avoid this issue in the future.
1/8/2015	TA-54, Area G, Pad 6, Dome 153	During a routine inspection, three waste containers were found to have questionable integrity around the filter vents. This is a noncompliance with Permit Section 3.2.	Three containers	3	1/8/2015 - 1/12/2015	The filters were checked and resealed.
2/18/2015	TA-54, Area G, Pad 9, Dome 230	During a routine inspection, a fire extinguisher that was not charged was found. This is a noncompliance of Permit Section 2.10.2.	Not applicable	1	2/18/2015 - 2/23/2015	The fire extinguisher was removed, as there are others within the permitted unit.

Table 1: Fiscal Year 2015 Noncompliance Report

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances of Noncompliance	Period of Noncompliance	Steps Taken to Resolve
2/19/2015	TA-54, Area G, Pad 10 TA-54, Area G, Pad 9, Dome 232 TA-54, Area G, Pad 9, Dome 231	During a routine inspection, numerous cracks within the asphalt were identified. This is a noncompliance with Permit Section 2.6.2.	Not applicable	3	2/19/2015 - 5/18/2015 3/19/2014 - 4/20/2015 10/16/2012 - 4/20/2015	The cracks in the asphalt were repaired. Repair of these cracks is conducted on a maintenance schedule as weather permits. When cracks are identified, storage of hazardous waste on the asphalt around the cracks are not permitted.
3/2/2015	TA-54, Area G, Pad 9, Dome 229	During a routine inspection, several tears in skylights throughout the dome were observed. This is a noncompliance with Permit Section 2.6.2.	Not applicable	1	3/2/2015 - 3/9/2015	Tears in the skylight were repaired.
3/2/2015	TA-54, Area G, Pad 10, Building 546 (x4) TA-54, Area G, Pad 10, Building 545 (x4) TA-54, Area G, Pad 9, Dome 232 (x17) TA-54, Area G, Pad 9, Dome 230 (x12) TA-54, Area G, Pad 9, Dome 229 (x137) TA-54, Area G, Pad 6, Dome 153 (x5) TA-54, Area G, Pad 5, Building 1028 (x4) TA-54, Area G, Pad 5, Dome 49 (x13) TA-54, Area G, Dome 33 (x8)	During a site-wide assessment at TA-54, Area G, containers were found to have inconsistent accumulation start dates when compared to operating record information. This is a noncompliance of Permit Section 2.12.2(1).	Not applicable	204	Various	A systemic fix in the operating record and a relabeling effort was implemented to correct the inconsistencies. Verification of containers at the facility is ongoing.
3/2/2015	TA-54, Area G, Pad 10, Building 546 (x3) TA-54, Area G, Pad 9, Dome 230 (x9) TA-54, Area G, Pad 9, Dome 229 (x7) TA-54, Area G, Pad 6, Dome 153 (x1) TA-54, Area G, Pad 5, Dome 49 (x2) TA-54, Area G, Dome 33 (x1)	During a site-wide assessment, containers were found with inconsistent Environmental Protection Agency (EPA) Hazardous Waste Number information when compared to the operating record. This is a noncompliance of Permit Section 3.6(1).	Not applicable	23	Various	A relabeling effort was implemented to correct the inconsistencies. Verification of containers at the facility is ongoing.

Table 1: Fiscal Year 2015 Noncompliance Report

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances of Noncompliance	Period of Noncompliance	Steps Taken to Resolve
3/2/2015	TA-54, Area G, Pad 9, Dome 230	A standard waste box (SWB) was found with an open lid. This is a noncompliance of Permit Section 3.5(1).	One container	1	3/2/2015 - 3/2/2015	The SWB lid was closed within 24 hours of discovery.
3/2/2015	TA-54, Area G Pad 9, Dome 229 (x1)	A single container was found with both nonhazardous and hazardous waste labels. This is a noncompliance of Permit Section 3.6(1).	One container	1	3/2/2015 - 7/1/2015	Characterization of waste within the container was verified as hazardous, and the nonhazardous waste label was removed.
3/2/2015	TA-54, Area G Pad 5, Dome 49 (x3)	Container labels were not visible for inspection. This is a noncompliance of Permit Section 3.8(2).	Three containers	3	3/2/2015 - 7/1/2015	New labels were applied to the containers to ensure visibility during inspections.
3/2/2015	TA-54, Area G Pad 5, Dome 49	A waste container was found to have multiple labels including EPA hazardous waste numbers on the container that did not match the operating record. Additionally, the container was stored upside down with an "Empty" label. This is a noncompliance with Permit Sections 3.5(1) and 3.6(1).	One container	1	3/2/2015 - 12/9/2015	The container was placed upright and characterization of the waste within the container was verified and the "Empty" label was removed and replaced with a hazardous waste label.
3/17/2015	TA-54, Area G, Pad 1 (x2) TA-54, Area G, Pad 9, Dome 229 (x3) TA-54, Area G, Pad 9, Dome 231 (x1) TA-54, Area G, Pad 5 (x3)	During wall-to-wall assessments, several containers were found in locations at TA-54, Area G to be unlabeled. This is a noncompliance of Permit Section 2.4.1.	Not applicable	9	Various	Characterization information on the containers could not be identified. Therefore, these waste containers have been recategorized as unknown waste. Characterization of the waste will be conducted in accordance with the corrective actions outlined in the noncompliance report. Corrective actions are ongoing for a compliant restart.
3/26/2015	TA-3, Building 29, CSU 9030	Because the permitted unit is not in use, facility personnel removed an eyewash adjacent to the unit. The contingency plan for the unit requires an eyewash. This is a noncompliance of Permit Section 2.10.1.	Not applicable	1	3/26/2015 - 3/28/2015	Facility personnel installed a new eye wash unit within two days of discovery. Management is maintaining a dialog with facility personnel to ensure that no additional equipment compliance issues occur.
4/8/2015	TA-55, PF-4, Rm 401	Inspection record forms were found to have the wrong inspection dates for three consecutive days. This is a noncompliance of Permit Section 2.6.1.	Not applicable	1	4/8/2015 - 4/11/2015	The incorrect inspection dates were immediately amended. Enhanced QA of the inspection records is occurring.
4/13/2015	TA-50-69 Indoor	The safety shower in building TA-50-69 failed the annual inspection. This is a noncompliance of Permit Section 2.10.2.	Not applicable	1	4/13/2015 - 5/27/2015	The safety shower was repaired.

Table 1: Fiscal Year 2015 Noncompliance Report

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances of Noncompliance	Period of Noncompliance	Steps Taken to Resolve
4/13/2015	TA-54, Area G, Pad 9, Dome 232	An 85- gallon container was missing a hazardous waste label. This is a noncompliance of Permit Sections 3.6(1) and 2.12.2.	One container	1	4/13/2015 - Ongoing	Preliminary characterization of the container has been performed and corrective actions as described within the noncompliance report. The container is categorized as maintenance waste and is believed to contain used caulking, solidified fire suppressant and dried paint. Final waste characterization will be performed to verify the container contents and assign appropriate waste characterization information.
4/13/2015	TA-54, Area G, Pad 9, Dome 232	A container that was indicated as "canceled" within the operating record was found to contain waste. This is a noncompliance with Permit Section 2.4.1.	One container	1	04/13/2015 - Ongoing	The container was re-activated on 9/25/2015 based on preliminary characterization. The contents of the container have been characterized as aerosol cans removed from transuranic waste containers as part of prohibited item disposition operations. Characterization will be verified and appropriate waste codes will be assigned.
4/16/2015	TA-54, Area G, Pad 1, Building 412	One 55-gallon drum has conflicting labels. This is a noncompliance of Permit Sections 3.6(1) and 2.12.2.	One container	1	04/16/15 - Ongoing	Preliminary characterization of the container has been performed and corrective actions are in the process of being implemented as described within the noncompliance report. The container is categorized as prohibited items that were removed from transuranic waste containers. Characterization will be performed to verify the container contents.
4/22/2015	TA-54, Area G, Pad 9, Dome 232	During a routine inspection, a waste container label was found to be missing an accumulation start date. This is a noncompliance of Permit Section 3.6(1).	One container	1	4/22/2015 - 4/27/2015	The container was relabeled with the appropriate accumulation start date information.
5/11/2015	TA-54, Area G, Pad 9, Dome 229	During a routine inspection, a waste container was found to be missing required labeling information. This is a noncompliance with Permit Section 3.6(1).	One container	1	5/11/2015 - 6/2/2015	The container was labeled with all required information.
5/13/2015	TA-54, Area G, Pad 9, Dome 232	During a routine inspection, a waste container was found with an inaccurate label that failed to list D003 as an EPA hazardous waste number. This is a noncompliance with Permit Section 3.6(1).	One container	1	5/13/2015 - Ongoing	The container will be relabeled as part of the corrective actions outlined in the noncompliance report.
5/26/2015	TA-54, Area L	During a routine inspection, it was found that a plumbed safety shower/eyewash combination did not have water supply. This is a noncompliance of Permit Section 2.10.2.	Not applicable	1	5/26/2015 - 8/4/2015	The water supply to the safety shower was repaired.

Table 1: Fiscal Year 2015 Noncompliance Report

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances of Noncompliance	Period of Noncompliance	Steps Taken to Resolve
7/14/2015	TA-54, Area G, Pad 11, Dome 375	Within the permitted unit, outside of the PermaCon, asphalt was found to be compromised. This is a noncompliance with Permit Section 2.6.2.	Not applicable	1	7/14/2015 - 8/17/2015	The damaged asphalt was repaired. Repairs of asphalt are conducted on a maintenance schedule as weather permits. When cracks are identified, storage of hazardous waste on the asphalt around the cracks are not permitted. Hazardous waste storage is not occurring within Dome 375 outside of the PermaCon.
7/31/2015	TA-3, Building 29	A single container does not contain the required labeling information, as it was missing the D018 EPA Hazardous Waste Number. This is a noncompliance with Permit Section 3.6(1).	One container	1	7/31/2005 - 7/31/2005	A new label was applied containing all required labeling information.
8/17/2015	TA-54, Area L Outdoor Pad	Sampling and analysis of a waste container located at a permitted unit was conducted in order to verify acceptable knowledge waste characterization information as required by Permit Section 2.4.7(1). Analysis of the liquid waste resulted in the identification of the presence of unidentified chloroform in hazardous waste quantities. Resampling results received on November 19, 2015 confirmed the presence of chloroform. This is a noncompliance with Permit Section 2.4.1.	One container	1	05/27/2015 - Ongoing	Upon confirmation of the presence of chloroform, a new waste stream profile that reflects the analytical data received will be created. The waste will be shipped off-site for disposal under the new waste stream profile before the one year storage date expires at TA-54, Area L. The laboratory process that generated the waste has been discontinued and this waste stream will not be generated again.
8/18/2015	TA-54, Area G, Pad 9, Dome 232	During a routine inspection, four waste containers were identified to have labels that indicate they contained free liquids but were not stored on secondary containment. This is a noncompliance of Permit Section 3.7.1(1).	Four containers	4	8/18/2015 - 8/25/2015	Waste containers were placed on adequate secondary containment.
9/8/2015	TA-50-69 Indoor and TA-50-69 Outdoor Pad	Telephone communication equipment was found non-operational and was not identified and replaced/mitigated within 24 hours. This is a noncompliance of Permit Sections 2.6.2 and 2.10.2.	Not applicable	1	9/08/15 - 10/28/15	The phones at TA-50-69 were reset after a power outage and confirmed to be working. Employees were reminded of the requirements for communication at the permitted unit. All of the personnel at the unit have immediate access to an internal alarm or emergency communication device either directly or through visual or voice contact with another employee.
9/14/2015	TA-54, Area G, Pad 5, Dome 224	During a routine inspection, a hazardous waste container was labeled as containing free liquids but was not on secondary containment. This is a noncompliance of Permit Section 3.7.	One container	1	9/14/2015 - 9/28/2015	The container was placed on secondary containment.

Table 1: Fiscal Year 2015 Noncompliance Report

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances of Noncompliance	Period of Noncompliance	Steps Taken to Resolve
9/28/2015	TA-54, Area G, Pad 10	Two structures (trailers) were removed from the permitted unit prior to seeking approval from the NMED-HWB through a Class 1* permit modification request as required by Permit Section 3.1(3).	Not applicable	1	9/21/2015 - 10/1/2015	The structures were moved back to Pad 10 and a permit modification request will be submitted to the NMED-HWB for approval. Movement of the structures will not occur until the NMED-HWB approves the request. The unit owners have been reminded of Permit requirements regarding changes to the facility. The NMED-HWB was previously verbally notified of the noncompliance on September 29, 2015.
9/30/2015	TA-3, Building 29	A single container did not contain required labeling information (missing the D004 EPA Hazardous Waste Number). This is a noncompliance of Permit Section 3.6(1).	One container	1	9/30/2015 - 9/30/2015	A new label was applied to the container identifying all required labeling information.
10/2/2014 10/8/2014 10/15/2014 4/15/2015 5/14/2015 5/20/2015 9/11/2015	TA-54, Area G, Pad 5, Dome 224	During seven routine inspections, the sump within the dome was found to contain water and the water was not removed within 24 hours of discovery. This is a noncompliance of Permit Section 3.7.1(2).	Not applicable	7	10/2/2014 - 10/7/2014 10/8/2014 - 10/13/2014 10/15/2014 - 10/21/2014 4/15/2015 - 4/20/2015 5/14/2015 - 5/20/2015 5/20/2015 - 5/27/2015 9/11/2015 - 9/15/2015	In each instance, the sump was pumped. There is a known issue with this sump accumulating liquid and routine efforts are being implemented to ensure the sump is pumped within 24 hours. In seven instances this year, the facility was unable to meet the 24 hour requirement for removal of liquids.
10/27/2014 1/7/2015 1/20/2015 10/19/2015	Not applicable	Correspondence from the Permittees to the New Mexico Environment Department - Hazardous Waste Bureau (NMED-HWB) was not placed in the Los Alamos National Laboratory (LANL) Public Reading Rooms (electronic or hardcopy) within the 10 days as required by Permit Section 1.10.	Not applicable	4	1/03/2014 - 10/28/2014 12/16/2014 - 1/8/2015 9/29/2014 - 1/21/2015 10/11/2015 - 10/20/2015	Correspondence was placed in the LANL Public Reading Rooms. The process for placing correspondence in the LANL Public Reading Rooms has been improved by the addition of a correspondence copy address that flags the document as reading room relevant.
3/9/2015 8/10/2015 9/14/2015 11/5/2014 5/11/2015 1/26/2015 2/9/2015 5/4/2015 9/2/2015 6/23/2015 8/11/2015	TA-54, Area G, Pad 1, Building 412 (x3) TA-54, Area G, Pad 10, Building 546 (x1) TA-54, Area G, Pad 6, Dome 283 (x1) TA-54, Area G, Pad 9, Dome 229 (x2) TA-54, Area G, Pad 9, Dome 232 (x2) TA-54, Area G, Storage Shed 8 (x2)	During several routine inspections, the 24 inches aisle spacing requirement was not maintained. This is a noncompliance with Permit Section 3.5.1(1).	Not applicable	11	3/9/2015 - 3/31/2015 8/10/2015 - 8/17/2015 9/14/2015 - 9/16/2015 11/5/2014 - 11/10/2014 5/11/2015 - 5/14/2015 1/26/2015 - 2/5/2015 2/9/2015 - 2/11/2015 5/4/2015 - 5/6/2015 9/2/2015 - 9/9/2015 6/23/2015 - 7/20/2015 8/11/2015 - 9/10/2015	The aisle spacing in the area was restored to meet the 24 inches aisle space requirement.

Table 1: Fiscal Year 2015 Noncompliance Report

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances of Noncompliance	Period of Noncompliance	Steps Taken to Resolve
5/18/2015 3/2/2015	TA-54, Area G, Pad 9, Dome 230 (x2)	During routine inspections, two waste containers were found to have both a hazardous and nonhazardous waste label. This is a noncompliance of Permit Section 3.6(1).	Two containers	2	5/18/2015 - 5/20/2015 3/2/2015 - 7/1/2015	The containers were evaluated and the proper hazardous waste labels were applied with required information.
6/2/2015 7/27/2015 7/28/2015	TA-54, Area G, Pad 1, Building 412 TA-54, Area G, Pad 1, Building 412 TA-54, Area G, Pad 6, Dome 283	During routine inspections, it was discovered that a pressurized eyewash had not been inspected. This is a noncompliance of Permit Section 2.10.2.	Not applicable	3	6/2/2015 - 8/3/2015 7/27/2015 - 7/30/2015 7/28/2015 - 7/30/2015	The eyewash was either inspected or removed from the unit if other eyewash stations were available.
6/2/2015 5/4/2015 6/2/2015 9/2/2015	TA-54, Area G, Pad 9, Dome 229 (x1) TA-54, Area G, Pad 9, Dome 232 (x3)	During four routine inspections, containers with ignitable waste had not been segregated from other waste containers. This is a noncompliance of Permit Section 2.8.1(2).	Not applicable	4	6/2/2015 - 6/8/2015 5/4/2015 - 5/6/2015 6/2/2015 - 6/8/2015 9/2/2015 - 9/8/2015	The containers with ignitable waste were segregated from other waste within the permitted unit.
6/8/2015 7/21/2015 2/23/2015	TA-54, Area G, Pad 9, Dome 229 (x2) TA-54, Area G, Pad 9, Dome 232 (x1)	During routine inspections, three secondary containment pallets were found to have accumulated water. This is a noncompliance with Permit Section 3.7.1(2).	Not applicable	3	6/8/2015 - 6/11/2015 7/21/2015 - 7/27/2015 2/23/2015 - 3/31/2015	Water was removed from secondary containment pallet.
7/21/2015 1/21/2015 5/18/2015 5/26/2015 6/8/2015 6/15/2015 7/7/2015 7/21/2015 8/3/2015 8/18/2015 9/8/2015	TA-54, Area G, Pad 6, Dome 153 (x1) TA-54, Area G, Pad 9, Dome 229 (x10)	During eleven routine inspections, waste containers were found to have water on the lids. This is a noncompliance with Permit Section 3.5.1(5).	Not applicable	11	7/21/2015 - 7/28/2015 1/21/2015 - 1/26/2015 5/18/2015 - 5/20/2015 5/26/2015 - 6/2/2015 6/8/2015 - 6/11/2015 6/15/2015 - 6/17/2015 7/7/2015 - 7/16/2015 7/21/2015 - 7/27/2015 8/3/2015 - 8/10/2015 8/18/2015 - 8/24/2015 9/8/2015 - 9/14/2015	The water was removed from the lids of the containers.

Table 1: Fiscal Year 2015 Noncompliance Report

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances of Noncompliance	Period of Noncompliance	Steps Taken to Resolve
8/27/2015 6/8/2015 4/14/2015 4/1/2015	TA-54, Area G, Pad 1, Building 412 (x1) TA-54, Area G, Pad 9, Dome 229 (x2) TA-54, Area G, Pad 9, Dome 232 (x1) TA-54, Area G, Pad 9, Dome 229 (x3)	During routine inspections, seven hazardous waste containers were found to be just beyond the edge of a secondary containment pallet. This is a noncompliance with Permit Section 3.7.	Seven containers	7	8/27/2015 - 8/31/2015 6/8/2015 - 6/11/2015 4/14/2015 - 4/16/2015 4/1/2015 - 4/8/2015	The containers were properly placed onto the secondary containment pallet.