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Date: **APR 25 2016**
Symbol: EPC-DO-16-092
LA-UR: 16-22292
Locates Action 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: Notification of Class 1 Modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, 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). The Permit was issued to the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), the Permittees, in November 2010. This permit modification provides revisions to Attachment D, *Contingency Plan* and to Attachment F, *Personnel Training Plan*.

The proposed modifications have been prepared in accordance with the Code of Federal Regulations [CFR], Title 40 (40 CFR) § 270.42(a). This Class 1 permit modification consists of changes in accordance with 40 CFR § 270.42, Appendix 1, Items B.6.d and B.5.b. Included with this permit modification package is this letter and an enclosure that contains a description of the permit modification and pages of the revised portions of Attachments D and F (LA-UR-16-22292). Accordingly, a signed certification page has also been included.

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 the entire Permit attachments. 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.

Mr. John E. Kieling
EPC-DO-16-092

- 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 ninety days of the transmittal of this permit modification.

If you have comments or questions regarding this permit modification, please contact Jordan Arnswald (DOE) at (505) 667-6764 or Mark Haagenstad (LANS) at (505) 665-2014.

Sincerely,

Sincerely,



John P. McCann
Division Leader (Acting)
Environmental Protection and Compliance
Division
Los Alamos National Security, LLC



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

JPM:KDL:MPH:FDN/lm

Enclosure: Class 1 Permit Modification Notification: Updates to Attachment D, Contingency Plan and Attachment F, Personnel Training Plan

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RECEIVED

APR 26 2016

**NMED
Hazardous Waste Bureau**

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ENCLOSURE 1

**Class 1 Permit Modification Notification: Updates to
Attachment D, Contingency Plan and Attachment F,
Personnel Training Plan**

EPC-DO-16-092

LA-UR-16-22292

Date: APR 25 2016

Permit Modification Notification

This document contains a notification for a Class 1 Permit Modification to update the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit). The text modifications are provided herein and have been made to the Permit by the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), collectively the Permittees. The modifications to the text of the Permit have been identified using underlined, red text for additions and red lines through the text for deletions.

Description

Attachment 1 of this modification provides updates to Section D.1.3 of Attachment D, *Contingency Plan*, and Table F-1 of Attachment F, *Personnel Training Plan*. A certification page in accordance with the requirements of Title 40 of the Code of Federal Regulations (40 CFR) § 270.11 is included in Attachment 2.

Permit Section D.1.3 of Attachment D, *Contingency Plan* has been updated to reflect an organizational name change. The original title of this section “Environmental Protection Division and Waste Management Division Response” has been revised to state “Environmental Protection and Compliance Division and Waste Management Division Response.” Additional revisions were made within the body of this section, and also in the table of contents, to reflect the organizational name change from “Environmental Protection Division” to “Environmental Protection and Compliance Division”. The acronym for this organization has also been revised from “ENV” to “EPC”.

Table F-1 of Attachment F, *Personnel Training Plan* has been updated to clarify respiratory protection training requirements for emergency responders. Hazmat Non-Entry curriculum was established for personnel who will not enter the hazard area as part of the Hazardous Materials Response Activities and, therefore, are not required to complete respiratory protection training. Only emergency responders who will enter the hazard area as part of the response activities are required to be authorized respirator users and complete the required respiratory protection training and fit testing. Non-entry responders will be limited to support roles in non-hazard areas. Language was added to Table F-1, in the form of a footnote, stating “Only emergency responders who will enter the hazard area as part of the response activities are required to be authorized respirator users. Non-entry responders are not required to complete respirator training or fit testing because they will not enter the hazard area as part of the response activities.”

Basis

This permit modification incorporates updated information that meets the conditions for Class 1 permit modifications listed within Appendix I of 40 CFR §270.42 and has been drafted in accordance with 40 CFR § 270.42 (a)(1). Attachment D, *Contingency Plan*, requires updates that meet the conditions specified in 40 CFR §270.42, Appendix I, Item B.6.d - organizational name updates. Attachment F, *Personnel Training Plan*, requires updates that meet the conditions specified in 40 CFR §270.42, Appendix I, Item B.5.b - other changes.

Attachment 1
Revised Permit Text

ATTACHMENT D
CONTINGENCY PLAN

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monitoring activities to determine the boundaries of the potential release. The HAZMAT Group may obtain resources from environmental monitoring groups, such as health physics and industrial hygiene personnel.

D.1.3 Environmental Protection and Compliance Division and Waste Management Division Response

At the scene, representatives and technical advisors from Environmental Protection and Compliance Division (~~ENVEPC~~), Waste Management Division (WM), and other response personnel are coordinated by the IC. In addition to their post-emergency duties, they may also be responsible for on-scene emergency operations such as planning. Depending on the type of emergency and the associated hazards, an individual from the most relevant group in the ~~EPCENV~~ shall provide technical support and shall ensure the Permittees' compliance with applicable federal, state, and local regulations.

D.1.3.1 Ecology Personnel

Ecology personnel provide field surveys of soil, foodstuffs, and biota to determine environmental effects of exposure after an emergency.

D.1.3.2 Meteorology and Air Quality Personnel

Meteorology and air quality personnel provide field surveys of air to determine environmental impacts and dose equivalent to members of the public after a radiological emergency. In addition, they provide expertise in meteorology to project short- and long-term environmental effects of emergency conditions.

D.1.3.3 Hazardous Waste Compliance Personnel

Hazardous waste compliance personnel provide guidance on regulatory requirements for proper treatment, storage, and transportation of hazardous and mixed wastes to other Facility groups. After an emergency, waste management sampling personnel may provide field sampling (*e.g.*, of soil, spills, or potentially hazardous waste) to determine environmental effects of exposure.

D.1.3.4 Water Quality and Hydrology Personnel

After an emergency, water quality and hydrology personnel provide sampling of surface water runoff and sediments to determine the environmental effects of an emergency and perform assessments for regulatory reporting requirements. They also provide expertise in hydrogeology to establish short- and long-term environmental effects of emergency conditions.

D.1.4 Other Facility Response Resources

Emergency response personnel from the Plutonium Manufacturing and Technology Division at TA-55 are trained to respond to emergencies at that facility. Personnel from the Los Alamos

ATTACHMENT F
PERSONNEL TRAINING PLAN

TABLE F-1
Facility-Wide Training Program Outline

Courses ^a	Permitted Unit ^b Hazardous/ Mixed Waste Worker	Manager/ Supervisor of permitted unit Hazardous/Mixed Waste Workers	Emergency Responder	Uncontrolled Area Potential Release Site Worker
<p>HAZWOPER^c: First Responder (Operations Level)</p> <p>(provides an overview of hazardous materials emergency response, including recognition and identification of hazardous materials and associated risks, required actions, and relationships with other emergency responders)</p>			X ^d	
<p>HAZWOPER: General Site Worker (40 hours)</p> <p>(provides general information on hazardous waste operations and emergency response for general site workers engaged in corrective action, remediation, or decontamination and decommissioning activities)</p>				X
<p>HAZWOPER: Refresher</p> <p>(provides general information on hazardous waste operations)</p>			X	X
<p>RCRA^e Personnel Training</p> <p>(includes an overview of 40 CFR Parts 260-265, 268; the New Mexico Administrative Code, Title 20, Chapter 4, Part 1; Department of Transportation shipping regulations; internal and external protocol for facility)</p>	X	X	* _f	*

Courses ^a	Permitted Unit ^b Hazardous/ Mixed Waste Worker	Manager/ Supervisor of permitted unit Hazardous/Mixed Waste Workers	Emergency Responder	Uncontrolled Area Potential Release Site Worker
inspections; operating equipment, communication systems, security systems; contingency plan; and emergency equipment use, inspection, and repair)				
RCRA Refresher Training (includes regulatory and legislative updates, occurrence reports and lessons learned, audit findings, modification/review of the contingency plan; provides required retraining)	X	X	*	*
Waste Generation Overview Live (includes waste management regulations and policies, definition of hazardous waste, wastes characterization and documentation, waste minimization, cycle of waste management at Los Alamos National Laboratory, storage and disposal)	X	X	X	X
Respirators: Air-Purifying (provides required annual retraining for operation and inspection of device, changing filters, donning and doffing)	*	*	X ^g	*

Courses ^a	Permitted Unit ^b Hazardous/ Mixed Waste Worker	Manager/ Supervisor of permitted unit Hazardous/Mixed Waste Workers	Emergency Responder	Uncontrolled Area Potential Release Site Worker
Respirators: Self-Contained Breathing Apparatus (provides required annual retraining for operation and inspection, changing compressed air bottles, donning and doffing, safety features, care and cleaning, fitting)	*	*	X ^g	*

^a Additional training courses (not listed in this attachment) may also be taken by personnel depending on the types of hazards (e.g., chemical) associated with a particular job description.

^b TSF = Treatment and storage facility

^c HAZWOPER = Hazardous Waste Operations and Emergency Response

^d X indicates a required course.

^e RCRA = Resource Conservation and Recovery Act

^f * indicates that a course may be required for specific job tasks and/or work areas.

^g Only emergency responders who will enter the hazard area as part of the response activities are required to be authorized respirator users. Non-entry responders are not required to complete respirator training or fit testing because they will not enter the hazard area as part of the response activities.

Attachment 2
Certification

CERTIFICATION

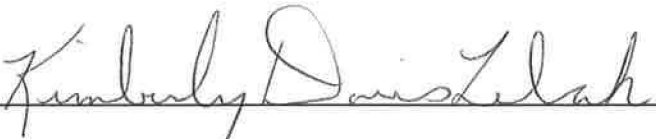
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage 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.



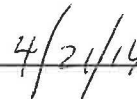
John P. McCann
Acting Division Leader
Environmental Protection and Compliance Division
Los Alamos National Security, LLC



Date Signed



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



Date Signed