



ESHID-602076

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Date: DEC 20 2016
Symbol: EPC-DO-16-366
LA-UR: 16-23515
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: Transmittal of Class 1 Permit Modification Notification to Add Less Than 90-Day Accumulation Areas to Attachment D, Contingency Plan, of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, EPA ID # 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 and Los Alamos National Security, LLC (DOE/LANS) in November 2010. This permit modification includes the addition of emergency equipment specific to the less than 90-day accumulation areas located throughout the Facility to Attachment D, *Contingency 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, Item A.1. Furthermore, this Class 1 permit modification does not include the addition of permit conditions. Although the less than 90 day accumulation areas are considered non-permitted units, they have been added to Attachment D, *Contingency Plan*, in order to demonstrate compliance with 40 CFR §265.53.

This permit modification package includes this transmittal letter and an enclosure with a description of changes and pages of the revised portions of Attachment D (LA-UR-23515). 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 collection of Permit attachments. The electronic copy, provided only to the New Mexico Environment Department Hazardous Waste Bureau (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.

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.

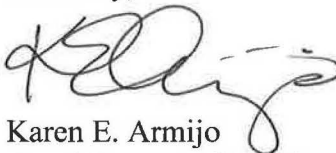
If you have comments or questions regarding this permit modification, please contact Karen E. Armijo (DOE) at (505) 665-7314 or Mark Haagenstad (LANS) at (505) 665-2014.

Sincerely,



John C. Bretzke
Division Leader
Environmental Protection and Compliance
Division
Los Alamos National Security, LLC

Sincerely,



Karen E. Armijo
Permitting and Compliance Program Manager
National Nuclear Security Administration
Los Alamos Field Office
U.S. Department of Energy

JCB/KEA/td

Enclosure: Class 1 Permit Modification Notification Update to the Permit Attachment D, Contingency Plan

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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, Item A.1. Furthermore, this Class 1 permit modification does not include the addition of permit conditions. Although the less than 90 day accumulation areas are considered non-permitted units, they have been added to Attachment D, Contingency Plan, in order to demonstrate compliance with 40 CFR §265.53.

This permit modification package includes this transmittal letter and an enclosure with a description of changes and pages of the revised portions of Attachment D (LA-UR-23515). Accordingly, a signed certification page has also been included.



ENCLOSURE 1

**Class 1 Permit Modification Notification: Update to
Attachment D, Contingency Plan**

EPC-DO-16-366

LA-UR-16-23515

DEC 20 2016

Date: _____

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 Permit Attachment D, *Contingency 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 Attachment D, *Contingency Plan* has been updated to include emergency equipment and other specific information necessary to incorporate the less than 90 day (<90 day) accumulation areas throughout the Facility. Less than 90 day accumulation areas, Table D-1 has been added to Attachment D and includes the necessary emergency equipment as applicable for each <90 day accumulation area.

Basis

This modification incorporates updated information that meets the conditions for a Class 1 Permit Modification notification in accordance with 40 CFR § 270.42(a). This Class 1 permit modification consists of changes in accordance with 40 CFR § 270.42 Appendix 1, Item A.1. This Attachment D, *Contingency Plan*, update does not include changes to any permit conditions. The addition of contingency specific requirements at the <90 day accumulation areas, which are non-permitted, are required to be added to Attachment D, *Contingency Plan* in order to demonstrate compliance with 40 CFR §265.53.

Attachment 2
Certification

ATTACHMENT D
CONTINGENCY PLAN

LIST OF TABLES

<u>TABLE NO.</u>	<u>TITLE</u>
D-1	Los Alamos National Laboratory-Wide Emergency Equipment
D-2	Waste Analysis Parameters and Test Methods
D-3	Evacuation Determination and Reentry Conditions
<u><90 day, D-1</u>	<u><90 Day Accumulation Areas Emergency Equipment</u>
TA-3, D-1	TA-3 Emergency Equipment
TA-50, D-1	TA-50 Emergency Equipment
TA-54, D-1	TA-54 Area L Emergency Equipment
TA-54, D-2	TA-54 Area G Emergency Equipment
TA-54, D-3	TA-54 West Emergency Equipment
TA-55, D-1	TA-55 Building 4, First Floor Emergency Equipment
TA-55, D-2	TA-55 Building 4 Basement Emergency Equipment
TA-55, D-3	TA-55 Container Storage Pad Emergency Equipment
TA-55, D-5	TA-55 Transuranic Waste Facility Emergency Equipment

ATTACHMENT D

GENERAL CONTINGENCY PLAN

This Attachment presents contingency measures applicable to all permitted hazardous or mixed waste management units and less than 90 (<90) day accumulation areas. The Permittees shall implement the provisions of this Plan and the applicable provisions of Permit Part 2 (*General Facility Conditions*) immediately to minimize hazards whenever there is a fire, explosion, or release of hazardous or mixed waste or hazardous or mixed waste constituents that could threaten human health or the environment.

D.1 HAZARDOUS AND MIXED WASTE EMERGENCY RESPONSE RESOURCES

1. The management of hazardous and mixed waste emergency incidents at the Facility resides within Permittees' Security and Emergency Operations 3 - Emergency Management Group (SEO-3:EM). During an emergency situation, line management (*i.e.*, the Line Manager of the affected area) works with an Emergency Manager serving as the SEO-3:EM Duty Officer from the SEO-3:-EM Group. The Emergency Manager has primary responsibility for managing emergency response operations, directing the Emergency Operations Support Center (EOSC) to make appropriate notifications, and activating the emergency response organizations. The Emergency Manager has authority to assume the role of Incident Commander (IC) during an emergency and typically assumes full responsibility for management of the emergency response operations at the scene. (Personnel from other organizations, such as the Federal Bureau of Investigation or the Los Alamos Fire Department [LAFD], may also assume the role of IC, depending upon the type of emergency and responding organizations.) Additional Facility resources that may provide assistance in an emergency include personnel from health physics, industrial hygiene, environment compliance, emergency response, and radiation protection personnel at the Facility. These personnel as well as other resources are discussed in Attachment Sections D.1.2, D.1.3, and D.1.6 of this Attachment.

2. Laboratory-contracted support services and other agencies shall also be available for assistance during emergencies. These are discussed in Attachment Section D.1.5 and include the contracted services for security and the LAFD. These contracted services, if changed, shall be replaced and/or supplemented with functionally equivalent contracted services required to assume the same duties and responsibilities described in this section. Other outside response agencies are discussed in Section D.1.7 and include the Los Alamos Police Department (LAPD) and the Los Alamos Medical Center (LAMC). The LAPD and the LAMC each provide assistance under a memorandum of understanding with the U.S. Department of Energy (DOE).

3. The Permittees shall use the Incident Command System (ICS) in response to all emergencies. The ICS is based on the on-scene management response structure protocols of the National Incident Management System (NIMS). The NIMS is a national standard that provides a solid foundation for an effective and integrated emergency response both locally and nationally, if necessary.

Emergency Management Coordinator, who will coordinate necessary emergency actions throughout the county.

D.1.7.3 Los Alamos Medical Center

The Facility maintains a fully equipped decontamination room adjacent to the emergency room at LAMC. In the event that a case is sent to LAMC, support for the emergency room staff is provided by Facility occupational medical personnel. Radiation protection, industrial hygiene, and HAZMAT personnel also provide assistance to the emergency room staff; assistance from additional Facility resources is provided, as necessary. Assistance is coordinated through SEO-3:EM personnel.

D.2 EMERGENCY EQUIPMENT AND COMMUNICATIONS

D.2.1 Emergency Equipment

The Permittees shall make available the lists of emergency equipment listed in Table D-1 for use at any of Permittees' hazardous or mixed waste management units. The list includes emergency equipment available in the HAZMAT vehicles and trailers as well as supplemental emergency equipment maintained by the LAFD, Maintenance Site Services, and occupational medicine personnel. A list of emergency equipment available for use at specific hazardous and/or mixed waste management units or <90 day accumulation areas are identified in Attachment Tables <90 day accumulation areas, D-1; TA-3, D-1; TA-50, D-1; TA-54, Area L, D-1; TA-54, Area G, D-2; TA-54 West, D-3; TA-55 Building 4 First Floor, D-1; TA-55 Building 4 Basement, D-2; TA-55 Container Storage Pad, D-3; D-4; and TA-63 Transuranic Waste Facility, D-5. Emergency equipment listed in these tables may be replaced and/or upgraded with functionally equivalent components and equipment, as necessary, for routine maintenance and repair.

D.2.2 Emergency Communications

The initial phase of an emergency may involve a small number of individuals at the affected area and that requires notification of the SEO-3:EM Duty Officer, utilizing local communication equipment and/or systems. When responding to hazardous and/or mixed waste emergencies, the Permittees shall ensure that SEO-3:EM personnel can provide communications between response units and emergency organizations.

D.2.2.1 Fire Alarms

Fire alarms are monitored 24 hours per day by trained personnel in the EOSC. Both the primary and backup buildings where the monitoring takes place have emergency power systems. The SEO-3:EM Duty Officer is notified when there is confirmed fire or smoke via the Los Alamos County Consolidated Dispatch Center.

mixed waste that present a potential threat to human health or the environment, as listed in Attachment Section D.3.1, require implementation of this Plan.

2. Hazardous and mixed wastes are stored on site at the Facility in a variety of containers. The general steps in handling hazardous and/or mixed waste spills are as follows:

1. Isolate the immediate area and deny entry to all unauthorized personnel;
2. Contain the spill by spreading sorbents or forming temporary dikes to prevent further migration (performed by properly trained personnel, if safe);
3. Monitor the spill area and sample the spilled waste and contaminated media.
4. Package the waste and contaminated media in sound containers;
5. Decontaminate the area and all involved equipment and personnel (followed by testing to assure adequate cleanup); and
6. Remove the waste and contaminated media (performed by appropriate waste management personnel).

3. The IC will determine the steps to be taken for spill mitigation. If initial mitigation of the spill is necessary and can be accomplished safely (by appropriately trained personnel) before the Emergency Manager arrives, a qualified member of the affected area's operating group will serve as the Facility Command Leader.

4. The Permittees shall ensure that hazardous and/or mixed waste spills are stabilized and cleaned up. During spill control and cleanup, all personnel shall wear appropriate personal protective equipment (PPE). Monitoring will be conducted to ensure that chemical and, as appropriate, radiological exposure is minimized. The collected material may be treated as hazardous or mixed waste, depending on the components present. Runoff from spills of listed hazardous or mixed waste that have migrated outside hazardous waste management areas must be contained and managed as hazardous or mixed waste, as appropriate. If the spill was from a characteristic hazardous or mixed waste and if it is determined by analysis that the runoff does not exhibit the characteristic (*i.e.*, ignitability, corrosivity, reactivity, and/or toxicity), the runoff need not be managed as characteristic waste. Temporary dikes may be constructed to contain runoff.

D.4.1 Spill Control Procedures

When a flammable organic solvent spill, a highly acidic spill, or a highly caustic spill has been stabilized with the contents of an organic solvent spill kit, an acid spill kit, or a caustic spill kit, respectively, the resulting material may be sorbed using a nonbiodegradable sorbent. Nonbiodegradable sorbent can be used to control any spill if it is known to be compatible with the spilled material. Appropriate containers or packaging shall be used to collect all spilled material and contaminated sorbent. Attachment Tables [<90 day accumulation areas, D-1](#); TA-3, D-1; TA-50, D-1; TA-54, Area L, D-1; TA-54, Area G, D-2; TA-54 West, D-3; TA-55 Building 4 First Floor, D-1; TA-55 Building 4 Basement, D-2; TA-55 Container Storage Pad, D-3; D-4; and TA-63 Transuranic Waste Facility, D-5 list emergency equipment available for spill control at specific units. The ultimate disposition of any contaminated sorbent or waste material shall be

explosion. Implementation of this Plan is required whenever there is an explosion at a permitted unit.

2. In the event of an explosion at the Facility, all personnel will immediately evacuate the area. Any injured personnel will be decontaminated at the site, if required and if time allows. An LAFD ambulance will transport these personnel to LAMC for treatment. If an injury is severe and requires immediate medical evacuation, the injured person will be wrapped to contain contamination, if necessary. In the case of an actual or potential explosion, on-site personnel will contact SEO-3:EM personnel immediately so that the Emergency Manager can ensure that all necessary emergency response personnel are alerted. The LAFD is notified automatically upon fire alarm activation. The Emergency Manager assumes incident command and will remain near but at a safe distance from the site in order to inform personnel responding to the explosion of the known hazards.

3. If a fire results from an explosion, the LAFD Senior Officer will, upon arrival at the scene, evaluate all available information and determine the appropriate firefighting methods and tactics. The LAFD Senior Officer will direct firefighting operations as the acting IC until SEO-3:EM formally assumes command.

D.6 FIRE

1. Fires and resultant releases of hazardous or mixed waste may result in a significant threat to human health or the environment. Implementation of this Plan is required whenever there is a fire at a permitted unit.

2. Fire alarms will be sounded automatically or manually to alert personnel that a fire hazard exists and to evacuate the area immediately if in the vicinity. Information related to the various fire alarms at the specific units is included in Attachment Tables [<90 day accumulation area, D-1](#); TA-3, D-1; TA-50, D-1; TA-54, Area L, D-1; TA-54, Area G, D-2; TA-54 West, D-3; TA-55 Building 4 First Floor, D-1; TA-55 Building 4 Basement, D-2; TA-55 Container Storage Pad, D-3; D-4; and TA-63 Transuranic Waste Facility, D-5.

3. Depending on the size of the fire and the fuel source, portable fire extinguishers may be used. However, Facility policy does not encourage the use of portable fire extinguishers by employees unless they are properly trained. Instead, Facility policy encourages immediate evacuation of the area and notification of the Los Alamos County Emergency Coordinator by dialing 911. For any fire, including a fire that involves hazardous or mixed waste, the responsible Line Manager and SEO-3:EM personnel must be contacted immediately. The Emergency Manager will alert the LAFD and all other necessary emergency response personnel. If the fire spreads or increases in intensity, all personnel must follow protective actions as designated by the Emergency Manager. The Emergency Manager assumes incident command and will remain near the scene to advise personnel responding to the fire of the known hazards.

4. Upon arrival at the scene, the LAFD Senior Officer will evaluate all available information and determine the appropriate firefighting methods and tactics. The LAFD Senior Officer will direct

LESS THAN 90 DAY (<90 DAY) ACCUMULATION AREA

ATTACHMENT D

CONTINGENCY PLAN

LESS THAN 90-DAY (<90-DAY) ACCUMULATION AREA

ATTACHMENT D

CONTINGENCY PLAN

Specific information on emergency response resources and release prevention/mitigation at <90 day accumulations areas is provided below.

Less than 90-day accumulation areas are designated as a space for accumulating hazardous or mixed waste in containers or tanks; the waste may not remain in the accumulation area longer than 90 days. The <90 accumulation areas are located throughout the Facility. Table D-1 contains a list of emergency equipment that may or may not be found at each <90 day accumulation area. The emergency equipment required for each site will be based on the requirements set forth by the industrial hygienist (IH) for that site. It is the waste management coordinators responsibility to contact the IH for each site to determine the type of emergency equipment required for each <90 day accumulation area.

Table D-1
<90 Day Accumulation Area
Emergency Equipment

FIRE CONTROL EQUIPMENT

Fire extinguishers (located at site)

Description of General Capabilities:

Each fire extinguisher has a 10-pound minimum capacity and may be used by any qualified employee in the event of a small fire.

Fire hydrants (located at site)

Description of General Capabilities:

The fire hydrants supply water at an adequate volume and pressure to satisfy the requirements of 40 CFR § 264.32(d).

Fire alarm pull boxes (located at site)

Description of General Capabilities:

Manually-operated fire alarms may be activated by any employee in the event of fire to notify the Los Alamos Fire Department (LAFD) and security personnel.

SPILL CONTROL EQUIPMENT

Spill control kits are site specific. Spill kits include (but are not limited to) sorbent pillows, and/or absorbent.

Description of General Capabilities:

Sorbent is used in the event of a small spill.

COMMUNICATION EQUIPMENT

Telephones, cellular phones or 2-way radios are required to be located at the site.

Description of General Capabilities:

Telephones are used for internal and external communication.

DECONTAMINATION EQUIPMENT

Emergency shower, eyewash stations, and hose bibs are located at each site.

Safety data sheets (SDS) are available hard copy or via online database.

Description of General Capabilities

Emergency shower and eye wash stations are used by personnel who receive a chemical splash to the skin or eyes. Specific SDS for the chemicals should be obtained prior to

OTHER

See Table D-1 of this Contingency Plan for equipment available in the Hazardous Materials Response Group vehicles.

Attachment 1
Revised Permit Text

CERTIFICATION

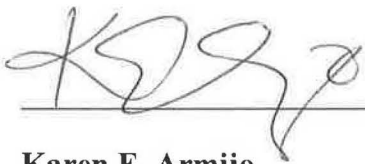
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage 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 C. Bretzke
Division Leader
Environmental Protection and Compliance Division
Los Alamos National Security, LLC

12-5-16

Date Signed



Karen E. Armijo
Permitting and Compliance Program Manager
Los Alamos Field Office
National Nuclear Security Administration
U.S. Department of Energy
Owner/Operator

12/14/16

Date Signed