



ESHID-602946

**Environmental Protection & Compliance Division**  
**Los Alamos National Laboratory**  
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**National Nuclear Security Administration**  
**Los Alamos Field Office**  
3747 West Jemez Road, A316  
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(505) 665-7314/Fax (505) 667-5948

*Date:* **MAR 19 2018**  
*Symbol:* EPC-DO: 18-058  
*LA-UR:* 18-21183  
*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

**Subject: Notification of Noncompliance with the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, EPA ID No. NM890010515**

Mr. Kieling:

The purpose of this letter is to notify the New Mexico Environment Department, Hazardous Waste Bureau (NMED-HWB) of a noncompliance with the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (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. The report, included as Enclosure 1, details an instance of noncompliance with the Permit that did not pose a threat to human health or the environment.

If you have comments or questions regarding this report, or would like to discuss in further detail, please contact Karen Armijo (DOE) at (505) 665-7314 or Mark Haagenstad (LANS) at (505) 665-2014.

Sincerely,

Benjamine B. Roberts  
Division Leader

Sincerely,

Karen E. Armijo  
Permitting and Compliance Program Manager

BBR/KEA/FN: am

Enclosure(s) 1) Notification of Noncompliance

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Janine Kramer, NMED-HWB, Santa Fe, NM, (E-File)  
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Siona Briley, NMED-HWB, Santa Fe, NM (E-File)  
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Sincerely,

Benjamine B. Roberts  
Division Leader

Sincerely,

Karen E. Armijo  
Permitting and Compliance Program Manager



# **ENCLOSURE 1**

**Notification of Noncompliance**

**EPC-DO: 18-058**

**LA-UR-18-21183**

**Date:** \_\_\_\_\_ **MAR 19 2018**

## **Notification of Noncompliance**

### **Los Alamos National Laboratory Hazardous Waste Facility Permit EPA ID No. NM890010515**

#### Introduction

This document 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.

#### Facility Information

##### Owner and Operator:

United States Department of Energy  
3747 West Jemez Road, MS A316  
Los Alamos, NM 87544

##### Co-Operator:

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

##### Facility:

Los Alamos National Laboratory  
Bikini Atoll Road, SM-30  
Los Alamos, NM 87545

#### Instance of Noncompliance with the Permit

- Date of Discovery: 01/30/2018
- Permitted Unit Location: Technical Area (TA) 54, Area L, Building 39
- Period of Noncompliance: January 30, 2018 – February 5, 2018
- Noncompliance: Permit Section 2.12.2(2)

On January 30, 2018, during a pre-transport inspection, it was discovered that the physical location of two (2) 1-gallon poly hazardous waste containers was not consistent with the operating record's inventory report. Line management was notified of the missing containers and all waste movement at Area L was paused while preliminary searches and wall-to-wall inventories ensued.

On February 2, 2018 LANL personnel notified the NMED-HWB, by telephone, of the two waste containers that were missing from the TA-54, Area L permitted storage unit. On February 5, 2018, after an extensive search and investigation, it was discovered that the two containers were overpacked into a 55-gallon waste container located at the TA-54, Area L permitted storage unit.

- Name and Quantity of Materials Involved:
  - Container ID# W841281
    - Container Type and Volume: One-gallon poly bucket
    - Waste Description: Non-acute RCRA Hazardous/DOT Lab Pack Waste
    - EPA Hazardous Waste Number: D011 (LOCTITE ABLESTIK 2902-R)
    - Waste Volume: 0.25 gallon
  - Container ID# W841286
    - Container Type and Volume: One-gallon poly bucket
    - Waste Description: Residual Conathane EN-4 and EN-7, as well as Conathane EN-4 and EN-7 contaminated waste material (plastic, kim wipes, wood, cotton, PPE) from the soldering and potting supply connector process
    - EPA Hazardous Waste Numbers: D003 and U223 (Toluene Diisocyanate)
    - Waste Volume: 1 gallon

#### Release from or at a Permitted Unit

During the period of noncompliance (January 30, 2018 through February 5, 2018), there were no releases within or from the TA-54, Area L permitted unit.

#### Steps Taken to Resolve/Prevent Recurrence

It was determined that the two hazardous waste containers were erroneously overpacked into a 55 gallon drum without line management authorization. A human performance improvement (HPI) investigation indicated that personnel did not follow the approved procedure for overpacking waste, did not properly document the overpacking operations, and did not update the Waste Compliance and Tracking System (WCATS) operating record to show that the two waste items had been overpacked.

The proposed corrective actions to prevent reoccurrence include:

- Placing tamper indicating devices (TIDs) on all waste containing drums received at Area L. The TID numbers will be input into WCATS and checked as part of the operating record inspections.
- Implementing a weekly wall-to-wall inventory of all containers stored at Area L.
- Additional field training to new shipping and packaging procedures

In addition, in order to ensure an accurate operating record, EPC-WMS will implement a monthly operating record compliance check to validate that the field inventory at Area L matches the

WCATS inventory. The inventory of all containers stored at Area L will be compared to the WCATS operating record inventory to verify that all markings, labeling, shipping name, container type, and accumulation start date in the field match the operating record.

**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.



**Benjamine B. Roberts**  
Division Leader  
Environmental Protection and Compliance Programs  
Los Alamos National Laboratory

3/6/2018

Date Signed



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

12 March 2018

Date Signed