



ESHID-603309

Environmental Protection & Compliance Division
PO Box 1663, MS K491
Los Alamos, NM 87545
(505) 667-2211

Symbol: EPC-DO: 18-398
Locates No: Not Applicable
Date: **NOV 29 2018**

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

Subject: Transmittal of Fiscal Year 2018 Report of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit

Dear Mr. Kieling:

This letter transmits a report required by Section 1.9.13, *Written Reporting of a Non-threatening Release*, and Section 1.9.14, *Other Noncompliance*, of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (the Permit). The Permit authorizes the U.S. Department of Energy (DOE); Triad National Security, LLC (Triad); and Newport News Nuclear BWXT-Los Alamos, LLC (N3B), collectively the Permittees, to manage, store, and treat hazardous waste at LANL. The Permittees are required to report to the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) all 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. The report is submitted annually by December 1 for the previous fiscal year (FY) ending September 30.

Included herein, Enclosures 1 and 2, are reports generated for FY 2018 that were prepared by Triad and N3B, respectively. Enclosure 1 addresses releases and instances of noncompliance at permitted units under operational control of Los Alamos National Security, LLC (LANS) during the reporting period. Conversely, Enclosure 2 addresses releases and instances of noncompliance at permitted units under operational control of N3B from April 30, 2018 through September 30, 2018. Each enclosure also contains a signed certification page from the responsible Co-Permittees.

If you have questions or comments concerning this submittal for Triad, please contact Karen E. Armijo of the Department of Energy (DOE) at (505) 665-7314 or Patrick L. Padilla (Triad) at (505) 667-3932.

If you have questions or comments concerning this submittal for N3B, please contact Arturo Duran of the Department of Energy-Environmental Management (EM-LA) at (505) 665-7772 or Stacie Singleton (N3B) at (505) 695-4527.

Sincerely,



Michael Hazen
Associate Lab Director
Environment, Safety, Health & Quality and Safeguards & Security
Triad National Security, LLC

MH/PLP/FDN:lvh

- Enclosure (s): 1) Fiscal Year 2018 Reporting of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit – Triad National Security, LLC
- 2) Fiscal Year 2018 Reporting of Noncompliance and Releases for Newport News Nuclear BWXT – Los Alamos

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Included herein, Enclosures 1 and 2, are reports generated for FY 2018 that were prepared by Triad and N3B, respectively. Enclosure 1 addresses releases and instances of noncompliance at permitted units under operational control of Los Alamos National Security, LLC (LANS) during the reporting period. Conversely, Enclosure 2 addresses releases and instances of noncompliance at permitted units under operational control of N3B from April 30, 2018 through September 30, 2018. Each enclosure also contains a signed certification page from the responsible Co-Permittees.

If you have questions or comments concerning this submittal for Triad, please contact Karen E. Armijo of the Department of Energy (DOE) at (505) 665-7314 or Patrick L. Padilla (Triad) at (505) 667-3932.

ENCLOSURE 1

**Fiscal Year 2018 Reporting of Releases and Instances of
Noncompliance with the Los Alamos National Laboratory Hazardous
Waste Facility Permit - Triad National Security, LLC**

EPC-DO: 18-398

LA-UR-18-30489

Date: NOV 29 2018

CERTIFICATION
Triad National Security, LLC

CERTIFICATION STATEMENT OF AUTHORIZATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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.




Michael Hazen
Associate Lab Director
Environment, Safety, Health & Quality and Safeguards &
Security
Triad National Security, LLC



Date Signed



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



Date Signed

Fiscal Year 2018 Reporting of Releases and Instances of Noncompliance Triad National Security, LLC

Introduction

This report has been prepared by the US Department of Energy (DOE) and Triad National Security, LLC (Triad) 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 to the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) annually by December 1 for the year ending the previous September 30.

This report addresses releases and instances of noncompliance at permitted units under operational control of Los Alamos National Security, LLC (LANS). 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, MS A316
Los Alamos, NM 87544

Co-Operator:
Triad National Security, LLC.
PO Box 1663
Los Alamos, NM 87545

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

Releases from or at a Permitted Unit

During the reporting period (October 1, 2017 through September 30, 2018), there were no releases within or from a permitted unit under operational control of LANS.

Instances of Noncompliance with the Permit

From October 1, 2017 through September 30, 2018, LANS documented 46 instances of noncompliance with the Permit; these occurrences are listed in Table 1, *Fiscal Year 2018 Noncompliance Report – Triad National Security, LLC*. Additional instances of noncompliance for this reporting period and from past activities at the facility were communicated to the NMED-HWB in letters dated:

- February 8, 2018, *Request for Accumulation and Storage Extension at the Los Alamos National Laboratory*, EPA ID #NM0890010515 (EPC-DO:18-063/LA-UR-18-20919)
- March 19, 2018, *Notification of Noncompliance with the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit*, EPA ID No. NM890010515 (EPC-DO:18-058/LA-UR-18-21183)
- April 26, 2018, *Delayed Notification of Waste Characterization Discrepancies and Addendum to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit Reporting Instances of Noncompliance and Releases/or Fiscal Year 2017* (EPC-DO:18-146/LA-UR-18-22666)

The Permittees continue to develop and improve waste management tools to ensure operating record compliance with the Permit, as well as work with waste workers and waste management personnel to identify and implement corrective actions that will minimize and/or prevent recurrence. Throughout the 2018 fiscal year, efforts to ensure an accurate operating record continued, and included the re-characterization of discrepant waste items/containers and the creation of new waste stream profiles that resulted in updated inventory reports and labels.

Table 1. Fiscal Year 2018 Noncompliance Report - Triad National Security, LLC

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances	Period of Noncompliance	Steps Taken to Resolve
1/11/2018 2/2/2018 1/31/2018	Technical Area 54 Area L	Three containers were stored over the 1-year storage limit. This is a noncompliance of Permit Section 2.3.1.	3 Containers	3	1/11/18 - 8/23/18 1/31/18 - 2/27/18 2/2/18 - 4/6/18	These noncompliances and the associated corrective actions were communicated to the New Mexico Environment Department - Hazardous Waste Bureau in a letter dated April 19, 2018 <i>Response to Notice of Violation from the New Mexico Environment Department Hazardous Waste Bureau</i> (EPC-DO:18-157/LA-UR-18-23097). Final disposition of two of the containers referenced in the letter has been completed. The third container was added to the Site Treatment Plan in August 2018.
8/24/2018 9/21/2018	Technical Area 54 Area L	Two containers were stored over the 1-year storage limit. This is a noncompliance with Permit Section 2.3.1.	2 Containers	2	8/24/18 - Ongoing 9/21/18 - Ongoing	The two containers belong to a population in storage at Area L that contain trace HE (high explosives) in methanol (D001 and F003) and require a DOT Special Permit prior to off-site shipment. A Storage Extension Request, in accordance with Permit Section 2.3.1(1) and 40 CFR 268.50(a)(2), will be submitted to store these containers beyond the 1-year storage limit until the DOT Special Permit is obtained.
10/23/2017 3/6/2018 3/20/2018 3/7/2018 3/26/2018 3/19/2018 11/15/2017	Technical Area 54, Area G Dome 153 (x2) Dome 229 (x10) Dome 232 (x3) Dome 49 (x1) Technical Area 54, Area L	Several containers were found to have inaccurate label information. This is a noncompliance of Permit Section 3.6(1).	17 Containers	8	10/23/17 - 10/24/17 3/6/18 - 3/13/18 3/20/18 - 3/21/18 3/6/18 - 3/8/18 3/7/18 - 3/8/18 3/26/18 - 3/27/18 3/19/18 - 3/20/18 11/15/17 - 12/12/17	All conflicting/inaccurate labels were removed. New hazardous waste labels, with information consistent with the operating record, were applied.
10/12/2017 4/3/2018	Technical Area 54, Area G Dome 375 Dome 229	During routine inspections, two 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).	2 Containers	2	10/12/17 - 10/26/17 4/3/18 - 4/5/18	Waste containers requiring secondary containment were placed on adequate secondary containment.
11/9/2017 10/10/2017 10/24/2017 11/1/2017	Technical Area 50, Building 69	Several containers were found to have inadequate labeling. This is a noncompliance of Permit Section 3.6(1).	5 Containers	4	11/9/17 - 11/29-17 10/10/17 - 10/11/17 10/24/17 - 10/25/17 11/1/17 - 11/2/17	Hazardous waste labels, with information consistent with the operating record, were applied to the containers.
11/2/2017 11/15/2017 11/20/2017	Technical Area 54, Area G Dome 230 (x3)	During a routine inspection, cracks within the asphalt were identified. This is a noncompliance of Permit Section 2.6.2.	N/A	3	11/2/17 - 11/15/17 11/15/17 - 11/16/17 11/20/17 - 11/29/17	The cracks in the asphalt were repaired. Asphalt repairs 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.

Table 1. Fiscal Year 2018 Noncompliance Report - Triad National Security, LLC

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances	Period of Noncompliance	Steps Taken to Resolve
12/18/2017	Technical Area 54, Area G Dome 232	A container holding liquid was found to be missing a free liquids label and was not stored on secondary containment. This is a noncompliance of Permit Section 3.6(2) and 3.7.1(1), respectively.	1 Container	1	12/18/17 - 12/20/17	A free liquids label was applied to the container and secondary containment was obtained.
3/19/2018	Technical Area 54, Area G Dome 230	Failure to protect a hazardous waste container from contact with precipitation. This is a noncompliance of Permit Section 3.5.1(5).	1 Container	1	3/19/18 - 3/20/18	Precipitation was removed and a protective cover was placed over the container. The precipitation did not come into contact with the waste and the container's integrity was not compromised.
12/11/2017 1/30/2018 2/15/2018	Technical Area 54, Area G Dome 33 (x2) Dome 232	Several containers holding liquid were found to be missing free liquids labels. This is a noncompliance of Permit Section 3.6(2).	7 Containers	4	12/11/17 - 12/12/17 1/30/18 - 1/31/18 2/15/18 - 2/20/18	Free liquids labels were applied to the containers.
3/12/2018	Technical Area 54, Area L				3/12/18 - 3/22/18	
3/7/2018	Technical Area 54, Area G Dome 232	A single container was found with a torn/illegible hazardous waste label. This is a noncompliance of Permit Section 3.6(1).	1 Container	1	3/7/18 - 3/8/18	A new hazardous waste label was applied to the container
2/5/2018 4/17/2018	Technical Area 54 Dome 283 Dome 232	During routine inspections, it was discovered that the 24 inches aisle spacing requirement was not maintained. This is a noncompliance of Permit Section 3.5.1(1).	N/A	2	2/5/18 - 2/7/18 4/17/18 - 4/18/18	The aisle spacing in the area was restored to meet the 24 inches aisle space requirement.
11/8/2017	Technical Area 55, Building 4	A required weekly hazardous waste inspection was not completed. This is a noncompliance of Permit Section 2.6.1.	N/A	1	11/8/17 - 11/9/17	Staff coordination discussions occurred to prevent reoccurrence.
10/27/2017 11/1/2017 4/6/2018 7/4/2018 7/18/2018	Technical Area 55, Building 4	Waste generator personnel were unable to conduct the required daily hazardous waste inspection due to the room being evaluated by Radiological Control Technicians. This is a noncompliance of Permit Section 2.6.1.	N/A	5	10/27/17 - 10/31/17 11/1/17 - 11/6/17 4/6/18 - 4/7/18 7/4/18 - 7/10/18 7/18/18 - 7/19/18	Inspections resumed after the assessment by the Radiological Control Technicians was completed.
10/13/2017	Technical Area 55, Building 4	Waste generator personnel were unable to conduct the required daily hazardous waste inspection due to facility ventilation work. This is a noncompliance of Permit Section 2.6.1.	N/A	1	10/13/17 - 10/14/17	Inspections resumed after the ventilation maintenance work was completed.
2/25/18 2/25/18 3/23/18 3/23/18 7/20/18	Not Applicable	In fiscal year 2018, there were 5 instances in which 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.	N/A	5	2/25/18 - 2/27-18 2/25/18 - 2/27/18 3/23/18 - 3/29/18 3/23/18 - 4/3/18 7/20/18 - 7/30/2018	Correspondence was placed in the LANL Public Reading Rooms. Interruptions in the delivery of incoming correspondence increased the length of time for submittal to the LANL Public Reading Rooms. Efforts have been made to increase communication and ensure that incoming correspondence is received by the programs that need them.

Table 1. Fiscal Year 2018 Noncompliance Report - Triad National Security, LLC

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances	Period of Noncompliance	Steps Taken to Resolve
2/24/2018	Not Applicable	In fiscal year 2018, there were 2 instances in which electronic mail (email) notification, required by Permit Section 1.15, was not conducted within 7 days.	N/A	2	2/24/18 - 2/26/18	Electronic mail notification was sent to the persons on the e-mail notification list. Although the documents were placed in the public reading rooms in a timely manner, the email notification was delayed due to a long weekend. Planning to avoid this situation has been implemented.
8/15/2018	Not Applicable	In fiscal year 2018, there was one instance in which notification of a permit modification, as required by Permit Section 1.6.2, was not sent to the facility mailing list within 90 days after the approval of the request.	N/A	1	8/15/18 - 10/3/18	Notification of the permit modification was sent to the facility mailing list. Efforts have been made to increase communication and ensure that public notices are sent to the facility mailing list in a timely manner.

ENCLOSURE 2

**Fiscal Year 2018 Reporting of Noncompliance and Releases for
Newport News Nuclear BWXT – Los Alamos, LLC**

**Los Alamos National Laboratory
Hazardous Waste Facility Permit**

Date: NOV 29 2018

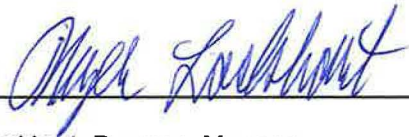
CERTIFICATION

NEWPORT NEWS NUCLEAR BWXT – LOS ALAMOS, LLC

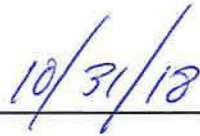
CERTIFICATION STATEMENT OF AUTHORIZATION

In accordance with the New Mexico Administrative Code Title 20, Chapter 4, Part 1 (incorporating the Code of Federal Regulations, Title 40 CFR § 270.11):

“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.”



Frazer Lockhart, Program Manager
Regulatory and Stakeholder Interface
Newport News Nuclear BWXT – Los Alamos, LLC



Date



David Rhodes, Director
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office



Date

November 2018
EM2018-0094

Fiscal Year 2018 Reporting of Noncompliance and Releases for Newport News Nuclear BWXT – Los Alamos, LLC

**Los Alamos National Laboratory
Hazardous Waste Facility Permit**



Newport News Nuclear BWXT – Los Alamos, LLC (N3B), under the U.S. Department of Energy Office of Environmental Management Contract No. 89303318CEM000007 (the Los Alamos Legacy Cleanup Contract), has prepared this document. The public may copy and use this document without charge, provided that this notice and any statement of authorship are reproduced on all copies.

1.0 INTRODUCTION

This report has been prepared by the U.S. Department of Energy (DOE) Environmental Management Los Alamos Field Office (EM-LA) and Newport News Nuclear BWXT – Los Alamos, LLC (N3B), collectively the Permittees, to meet the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (the Permit) reporting requirement. Permit Sections 1.9.13 and 1.9.14 require reporting any non-threatening releases 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.

This report addresses N3B-operator associated releases and instances of noncompliance from April 30, 2018, through September 30, 2018. None of the releases or incidents of noncompliance detailed within this report posed a potential threat to human health or the environment.

2.0 FACILITY INFORMATION

Owner and Operator:

United States Department of Energy

Environmental Management Los Alamos Field Office

1900 Diamond Drive

Los Alamos, NM 87544

(505) 665-5658

Co-Operator:

Newport News Nuclear BWXT – Los Alamos, LLC

600 6th Street

Los Alamos, NM 87544

(505) 661-5918

Facility:

Technical Area 54

Los Alamos National Laboratory

Mesita del Buey Road

Los Alamos, NM 87545

(505) 661-5918

3.0 RELEASES FROM OR WITHIN A PERMITTED UNIT

During the time period of April 30, 2018, through September 30, 2018, there were no releases at or from a permitted unit under N3B management. One container leaked into secondary containment and was overpacked within 24 hours.

4.0 INSTANCES OF PERMIT NONCOMPLIANCE

From April 30, 2018, through September 30, 2018, 23 instances of Permit noncompliance were documented and are listed in Table 1. The majority of the occurrences are associated with water in sumps and container labeling issues. Other instances of noncompliance include aisle spacing and one leaking container that was overpacked within 24 hours of identification.

In early 2018, a complete wall-to-wall assessment of the storage units at Technical Area 54 (TA-54), Areas G and L were completed before the transition from Los Alamos National Security, LLC, to N3B. The assessment was conducted to verify waste records before the operator transition on April 30, 2018.

A deliberate and compliant restart of activities under N3B and DOE is underway. However, because the facility was transitioned from one co-operator to a new start-up co-operator, activities at the permitted facility are currently very limited. No shipments of waste were conducted between April 30, 2018, and September 30, 2018. Some instances of noncompliance are still awaiting resolution.

Future potential corrective actions associated with these types of noncompliances are being developed. Careful inspection for container integrity is being undertaken. Sump management and standing water is carefully monitored and corrective actions are taken immediately.

Waste container characterization 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, and the facility operating record will be updated. Once these steps have been completed, future instances of noncompliance will be resolved for waste containers in storage at TA-54, Area G.

The Permittees are currently working toward a carefully considered restart of operations at the TA-54, Area G facility. Additionally, N3B is developing new waste management policies and procedures to ensure operations are compliant with the Permit. N3B is working to improve the identification and remediation of Permit noncompliance to prevent recurrence.

**Table 1
Fiscal Year 2018 Noncompliance Report for N3B**

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instance of Noncompliance	Periods of Noncompliance	Corrective Actions
5/7/2018 at 11:08 a.m.	TA-54 – 224	Water in sump	1 gal. of water	7	5/7/2018–5/14/2018, 5/20/2018, 6/4/2018–6/10/2018, 7/9/2018–7/11/2018, 7/30/2018–8/5/2018, 8/6/2018–8/12/2018, 9/24/2018–9/30/2018	Sump was pumped on 9/27/2018.
5/10/2018 at 11:32 a.m., 9:55 a.m., and 9:00 a.m.	TA-54 – 33, 232	Not meeting the required 24-in. aisle spacing	4 columns	2	5/10/2018-5/11/2018, 9/17/2018–9/23/2018	Ensure aisle spacing is at least 24-in.
5/7/2018 at 10:35 a.m.	TA-54 – 231	Eyewash/shower inspection expired	1	5	5/7/2018–5/13/2018, 5/14/2018–5/20/2018, 6/11/2018–6/17/2018, 7/9/2018–7/15/2018, 7/16/2018–7/22/2018, 8/6/2018–8/12/2018	Inspection was done; this was data error.
5/9/2018 at 1:33 p.m.	TA-54 – 49	Labels could not be read and need to be replaced	3 55-gal. drums of radioactive waste: LA00000072007, LA000000070156, and LA00000071986	3	5/7/2018–5/13/2018	New labels have been put in place; visual verification was performed on 10/16/2018.
5/22/2018 at 11:00 a.m. and 11:20 a.m.	TA-54 – 229 and 230	Water on lids	0.5 gal. of water	1	5/21/2018–5/27/2018	Water was removed on 5/24/2018.
5/22/2018 at 8:50 a.m.	TA-54, Area L	Water in sumps	0.5 gal. of water	1	5/21/2018–5/27/2018	Water was removed on 5/24/2018.

Table 1 (continued)

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instance of Noncompliance	Periods of Noncompliance	Corrective Actions
5/28/2018 at 10:35 a.m.	TA-54 – 232	Labels are illegible and U.S. Environmental Protection Agency code and start dates are missing	4 55 gal. drums of radioactive waste: LA00000072726, LA00000072744, LA00000072788, and LA00000072688	1	5/28/2018–5/30/2018	New labels have been put in place; visual verification was performed on 10/17/2018.
6/18/2018 at 11:00 a.m.	TA-54 – 375	Standing water in sump	1 gal. of water	1	6/18/2018–6/24/2018	Sump was pumped on 9/27/2018.
8/6/2018–8/12/2018 at 11:23 a.m. and 12:05 p.m.	TA-54 – 33, 8, and 375	Fire alarms down/out of service due to fire panel	1 alarm panel	1	8/7/2018–9/6/2018	All alarms were fixed on 9/6/2018.
8/27/2018 at 8:28 a.m.	TA-54 – 230	Integrity of drum/container, leaking drum into secondary containment	1 85-gal. drum of radioactive waste: #5843515	1	8/27/2018–9/2/2018	Drum was repackaged into larger drum; no industrial hygiene or radiological concerns were recorded on 8/28/2018.
9/17/2018 at 10:15 a.m.	TA-54 – 33	Standing water in secondary containment under hazardous waste drum	0.5 gal. of water	1	9/17/2018–9/23/2018	Sump was pumped on 9/27/2018.