



**COPY**

ESHID-603539

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

Symbol: EPC-DO: 19-426  
Locates No: N/A  
LA-UR No: 19-31663  
Date: **NOV 25 2019**



Bureau Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6313

**Subject: Transmittal of Fiscal Year 2019 Report of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit EPA ID #NM0890010515**

Dear Sir or Madam:

The Department of Energy, National Nuclear Security Administration, Los Alamos Field Office (NA-LA), Environmental Management Los Alamos Field Office (EM-LA), Triad National Security, LLC (Triad) and Newport News Nuclear BWXT- Los Alamos (N3B), (collectively, the Permittees), are submitting this 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 (Permit) to the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB); to manage, store, and treat hazardous waste at LANL. The Permittees are required to report to the 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 2019 that were prepared by Triad and N3B, respectively. Enclosure 1 addresses releases and instances of noncompliance at permitted units under operational control of Triad during the reporting period. Conversely, Enclosure 2 addresses releases and instances of noncompliance at permitted units under operational control of N3B during the reporting period. Each enclosure also contains a signed certification page from the responsible Permittees.

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



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

Symbol: EPC-DO: 19-426  
Locates No: N/A  
LA-UR No: 19-31663  
Date: **NOV 25 2019**

Bureau Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6313

**Subject: Transmittal of Fiscal Year 2019 Report of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit EPA ID #NM0890010515**

Dear Sir or Madam:

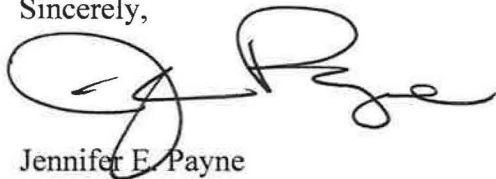
The Department of Energy, National Nuclear Security Administration, Los Alamos Field Office (NA-LA), Environmental Management Los Alamos Field Office (EM-LA), Triad National Security, LLC (Triad) and Newport News Nuclear BWXT- Los Alamos (N3B), (collectively, the Permittees), are submitting this report 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 (Permit) to the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB); to manage, store, and treat hazardous waste at LANL. The Permittees are required to report to the 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 2019 that were prepared by Triad and N3B, respectively. Enclosure 1 addresses releases and instances of noncompliance at permitted units under operational control of Triad during the reporting period. Conversely, Enclosure 2 addresses releases and instances of noncompliance at permitted units under operational control of N3B during the reporting period. Each enclosure also contains a signed certification page from the responsible Permittees.

If you have questions or comments concerning this submittal for Triad, please contact Karen E. Armijo of the Department of Energy (NNSA) 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) 257-7907 or Emily Day (N3B) at (505) 695-4243.

Sincerely,



Jennifer E. Payne  
Division Leader  
Environmental Protection and Compliance  
Triad National Security, LLC  
Los Alamos National Laboratory

ET/JP/CAM/CLJ:os

- Enclosure (s):
- 1) Fiscal Year 2019 Reporting of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit – Triad National Security, LLC
  - 2) Fiscal Year 2019 Reporting of Noncompliance and Releases for Newport News Nuclear BWXT-Los Alamos, LLC, - N3B Los Alamos National Laboratory Hazardous Waste Facility Permit

Copy:

Gabriel M. Pugh, LASO, [gabriel.pugh@nnsa.doe.gov](mailto:gabriel.pugh@nnsa.doe.gov)  
Peter Maggiore, NA-LA, [peter.maggiore@nnsa.doe.gov](mailto:peter.maggiore@nnsa.doe.gov)  
Jody M. Pugh, NA-LA, [jpugh@lanl.gov](mailto:jpugh@lanl.gov)  
Karen E. Armijo, NA-LA, [karen.armijo@nnsa.doe.gov](mailto:karen.armijo@nnsa.doe.gov)  
Adrienne L. Nash, NA-LA, [adrienne.nash@nnsa.doe.gov](mailto:adrienne.nash@nnsa.doe.gov)  
David Nickless, EM-LA, [david.nickless@nnsa.doe.gov](mailto:david.nickless@nnsa.doe.gov)  
Arturo Q. Duran, EM-LA, [arturo.duran@em.doe.gov](mailto:arturo.duran@em.doe.gov)  
Lee Bishop, EM-LA, [lee.bishop@em.doe.gov](mailto:lee.bishop@em.doe.gov)  
Joseph Legare, N3B, [joseph.legare@em.doe.gov](mailto:joseph.legare@em.doe.gov)  
Elizabeth Lowes, N3B, [Elizabeth.lowes@em.doe.gov](mailto:Elizabeth.lowes@em.doe.gov)  
Glenn Morgan, N3B, [glenn.morgan@em.doe.gov](mailto:glenn.morgan@em.doe.gov)  
Pamela Maestas, N3B, [pamela.maestas@em-la.doe.gov](mailto:pamela.maestas@em-la.doe.gov)  
Emily Day, N3B, [emily.day@em-la.doe.gov](mailto:emily.day@em-la.doe.gov)  
Stacie Burke, N3B, [stacie.burke@em-la.doe.gov](mailto:stacie.burke@em-la.doe.gov)  
Kristin Henderson, N3B, [kristin.henderson@em-la.doe.gov](mailto:kristin.henderson@em-la.doe.gov)  
Susan McMichael LC-ESH, [smcmichael@lanl.gov](mailto:smcmichael@lanl.gov)  
Michael Hazen, ESHQSS, [mhazen@lanl.gov](mailto:mhazen@lanl.gov)  
Enrique Torres, EWP, [etorres@lanl.gov](mailto:etorres@lanl.gov)  
Jennifer Payne, EPC-DO, [jpayne@lanl.gov](mailto:jpayne@lanl.gov)  
Peter H. Carson, EPC-WMP, [pcarson@lanl.gov](mailto:pcarson@lanl.gov)  
Darlene Trujillo, EPC-WMP, [darlenet@lanl.gov](mailto:darlenet@lanl.gov)

Patrick L. Padilla, EPC-WMP, [plpadilla@lanl.gov](mailto:plpadilla@lanl.gov)  
Catherine L. Juarez, EPC-WMP, [cjuarez@lanl.gov](mailto:cjuarez@lanl.gov)  
Oral S. Saulters, EPC-WMP, [osaulters@lanl.gov](mailto:osaulters@lanl.gov)  
Jaime Rodriguez, EPC-WMP, [jrodriguez@lanl.gov](mailto:jrodriguez@lanl.gov)  
Clare E. Bena, EPC-WMP, [cbena@lanl.gov](mailto:cbena@lanl.gov)  
[locateteam@lanl.gov](mailto:locateteam@lanl.gov)  
[epccorrespondence@lanl.gov](mailto:epccorrespondence@lanl.gov)  
[rcra-prr@lanl.gov](mailto:rcra-prr@lanl.gov)  
[adesh-records@lanl.gov](mailto:adesh-records@lanl.gov)  
[emla.docs@em.doe.gov](mailto:emla.docs@em.doe.gov)  
[n3brecords@em-la.doe.gov](mailto:n3brecords@em-la.doe.gov)

# **ENCLOSURE 1**

**Fiscal Year 2019 Reporting of Releases and Instances of  
Noncompliance with the Los Alamos National Laboratory Hazardous  
Waste Facility Permit - Triad National Security, LLC**

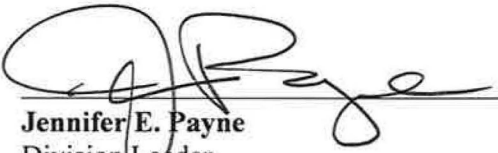
**EPC-DO: 19-426**

**LA-UR-19-31663**

**Date:** NOV 25 2019

### CERTIFICATION

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.

  
\_\_\_\_\_  
**Jennifer E. Payne**  
Division Leader  
Environmental Protection and Compliance  
Triad National Security, LLC  
Los Alamos National Laboratory

21 November 2019  
Date Signed

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

21 Nov 2019  
Date Signed

## **Fiscal Year 2019 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 Triad. 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, 2018 through September 30, 2019), there was one release within or from a permitted unit under operational control of Triad. On September 12, 2019, at the TA-55 HENC pad, a battery was overfilled during routine maintenance. Subsequent charging expanded the battery acid causing it to overflow the battery. The spilled material (less than one quart) had a pH of 0-1. HAZMAT responded and cleaned the area by neutralizing and then absorbing the spilled material. The subsequent waste generated from cleanup activities was containerized and managed in a compliant manner. The spill did not leave the site or adversely impact any SWMUs or AOCs. A release means any accidental or intentional spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, or dumping of any hazardous waste or hazardous constituents inside a permitted unit

or from a permitted unit to the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous waste or hazardous constituents.

#### Instances of Noncompliance with the Permit

From October 1, 2018 through September 30, 2019, Triad documented 19 instances of noncompliance with the Permit; these occurrences are listed in Table 1, *Fiscal Year 2019 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:

- December 10, 2018 *Request for Extension of the One-Year Storage Limit at the Los Alamos National Laboratory, Technical Area 54, Area L* (EPC-DO: 18-422/ LA-UR-18-30935)
- November 29, 2018 *Notification of Anticipated Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit, EPA ID No. NM890010515* (EPC-DO: 18-433/ LA-UR-18-30998)

The Permittees continue to evaluate, develop and improve waste management processes and tools to ensure operating record compliance with the Permit, as well as work with waste operators and waste management personnel to identify and implement corrective actions that will minimize and/or prevent recurrence. Throughout the 2019 fiscal year, efforts to ensure an accurate operating record have and will continue.



Table 1. Fiscal Year 2019 Noncompliance Report - Triad National Security, LLC

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances	Period of Noncompliance	Steps Taken to Resolve
10.10.18	55-04-401	A required weekly hazardous waste inspection was not completed. This is a noncompliance of Permit Section 2.6.1.	N/A	1	10.09.18 - 10.10.18	Staff coordination discussions occurred to prevent reoccurrence during holiday closure and snow days.
12.09.18	55-04-401	A required weekly hazardous waste inspection was not completed. This is a noncompliance of Permit Section 2.6.1.	N/A	3	11.21.18 - 11.26.18 11.28.18 - 12.04.18 and 12.09.18	Staff coordination discussions occurred to prevent reoccurrence during holiday closure and snow days.
1.07.19	55-04-B40	A required weekly hazardous waste inspection was not completed. This is a noncompliance of Permit Section 2.6.1.	N/A	1	12.31.18 - 1.06.19	Staff coordination discussions occurred to prevent reoccurrence during holiday closure and snow days.
1.07.19	55-04-B45	A required weekly hazardous waste inspection was not completed. This is a noncompliance of Permit Section 2.6.1.	N/A	1	12.31.18 - 1.06.19	Staff coordination discussions occurred to prevent reoccurrence during holiday closure and snow days.
1.07.19	55-04-K13	A required weekly hazardous waste inspection was not completed. This is a noncompliance of Permit Section 2.6.1.	N/A	1	12.31.18 - 1.06.19	Staff coordination discussions occurred to prevent reoccurrence during holiday closure and snow days.
1.07.19	55-04-PAD	A required weekly hazardous waste inspection was not completed. This is a noncompliance of Permit Section 2.6.1.	N/A	1	12.31.18 - 1.06.19	Staff coordination discussions occurred to prevent reoccurrence during holiday closure and snow days.
1.07.19	55-04-355	A required weekly hazardous waste inspection was not completed. This is a noncompliance of Permit Section 2.6.1.	N/A	1	12.31.19 - 1.06.19	Staff coordination discussions occurred to prevent reoccurrence during holiday closure and snow days.
1.07.19	55-04-B05	A required weekly hazardous waste inspection was not completed. This is a noncompliance of Permit Section 2.6.1.	N/A	1	12.31.18 - 1.06.19	Staff coordination discussions occurred to prevent reoccurrence during holiday closure and snow days.
1.30.19	55-04-B05	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	1	1.28.19 - 2.07.19	Inspections resumed after the assessment by the Radiological Control Technicians was completed.
2.07.19	55-04-B40	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	1	1.28.19 - 2.07.19	Inspections resumed after the assessment by the Radiological Control Technicians was completed.

Table 1. Fiscal Year 2019 Noncompliance Report - Triad National Security, LLC

Date of Discovery	Permitted Unit Location	Noncompliance	Quantity of Material	Instances	Period of Noncompliance	Steps Taken to Resolve
1.07.19 7.15.19 10.24.19	Not Applicable	In fiscal year 2019, there were 6 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	6	12.30.18 - 1.10.19 1.07.19 - 1.10.19 3.30.19 - 10.24.19 6.14.19 - 7.18.19 8.24.19 - 8.26.19 3.30.19 - 8.30.19	Correspondence was placed in the LANL Public Reading Rooms. In two instances personnel absence due to Laboratory weather-related closure or illness prevented the timely submittal of the document to the LANL Public Reading Rooms. In four instances, the documents were not provided to the correct personnel for submittal to the LANL Public Reading Rooms. Efforts have been made to increase communication and ensure that correspondence is received by the correct personnel in a timely manner.
9.18.2019	Not Applicable	Approximately 250 waste drums shipped to the WIPP facility were found to be showing in the operating record as still on site at LANL. Some of those containers were non-hazardous TRU waste containers but the majority was Mixed TRU waste. This is a noncompliance of Permit Section 2.12.2(2).	250 drums	1	9-18-19 - 10.10.2019	The task of verifying a waste shipment to WIPP was found to be lacking specific responsible personnel for final operating record verification and updates. Management has defined the roles and responsibilities (including back up personnel) to ensure the waste shipment verification is complete and accurate. The operating record is current and accurate.

## **ENCLOSURE 2**

Fiscal Year 2019 Reporting of Noncompliance and Releases for  
Newport News Nuclear BWXT (N3B)

Date: NOV 25 2019

November 2019  
EM2019-0424

**Fiscal Year 2019 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.

**CERTIFICATION**


**NEWPORT NEWS NUCLEAR BWXT-LOS ALAMOS, LLC**


**CERTIFICATION STATEMENT OF AUTHORIZATION**

---

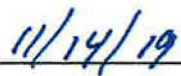
In accordance with the New Mexico Administrative Code Title 20, Chapter 4, Part 1 (incorporating the Code of Federal Regulations, Title 40 CFR § 270.11):

"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."

  
\_\_\_\_\_  
Elizabeth Lowes, Program Manager *for*  
Environment, Safety, and Health  
Newport News Nuclear BWXT-Los Alamos, LLC

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Dave Nickless, Acting Director  
Office of Quality and Regulatory Compliance  
Environmental Management  
Los Alamos Field Office

  
\_\_\_\_\_  
Date

## 1.0 INTRODUCTION

This report has been prepared by the U.S. Department of Energy Environmental Management Los Alamos Field Office and Newport News Nuclear BWXT-Los Alamos, LLC (N3B), collectively the Permittees, to meet the Los Alamos National Laboratory 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 October 1, 2018, through September 30, 2019. None of the instances of Permit noncompliance detailed within this report posed a potential threat to human health or the environment. Noncompliance and potential noncompliance concerns noted in the New Mexico Environment Department (NMED) notices of violation (NOVs), dated March 27, 2019, and August 20, 2019, are included in this report.

## 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) 257-7950

Co-Operator:

Newport News Nuclear BWXT-Los Alamos, LLC

1200 Trinity Drive, Suite 150

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 October 1, 2019, through September 30, 2019, there were no releases at or from a permitted unit under N3B management.

### **4.0 INSTANCES OF PERMIT NONCOMPLIANCE**

From October 1, 2018, through September 30, 2019, 29 instances of Permit noncompliance were documented and are listed in Table 1. The majority of instances of Permit noncompliance are associated with safety equipment inspections and container labeling issues.

N3B did experience structural damage to two storage domes during the unusually heavy snowfall between late December 2018 and early January 2019. As a result, repairs to the domes, already scheduled for re-skinning, were accelerated with NMED approval. Waste containers were moved or covered with secured tarps to protect the containers from precipitation resulting from holes caused by the damage.

Additionally, N3B implemented corrective actions to address the specific, individual items identified in the August 20, 2019, NMED NOV, and to more broadly evaluate and address extent of condition and causes to minimize the potential for recurrence. N3B is implementing additional actions across the company, which include the following:

- An individual will be assigned to each permitted storage area to be personally accountable for ensuring the facility is maintained to meet N3B standards for operational discipline as well as the Resource Conservation and Recovery Act (RCRA) Permit and regulatory requirements.
- New personnel have been hired for additional waste management responsibilities.
- Reinforce expectations and standards for facility inspections and ensure that inspectors have the necessary tools to effectively perform their duties. An additional unified round sheet is being developed to ensure consistent inspection criteria and improve inspection performance.
- Increase the use of management walkdowns and a means for additional oversight and reinforcement of expectations.
- Reinforce the use of the N3B Issues Management System to ensure that RCRA-compliance-related deficiencies are quickly identified; fact finding and cause analysis are conducted as appropriate; and corrective actions are quickly identified, assigned, and tracked to completion in a timely manner and in accordance with the RCRA Permit.
- An asphalt crack repair campaign was completed. All reported asphalt cracks are sealed within 24 hr.
- A targeted relabeling effort was completed.

N3B continues to develop new and improved waste management policies and procedures to ensure operations are compliant with the RCRA Permit. N3B is working to improve the identification and remediation of Permit noncompliance to prevent recurrence. Additionally, staff training for weekly inspections is being assessed for continuous improvements to address safety equipment inspections and labeling issues.



**Table 1**  
**Fiscal Year 2019 Noncompliance Report for N3B**

Date of Discovery	TA-54 Permitted Unit Location	Permit Section	Noncompliance Description	Quantity of Material Spilled	Number of Noncompliance Instances	Days Out of Compliance	Corrective Actions Taken
3/29/2018	Dome 375	Permit Condition 2.6.2	Failure to remedy within 24 hr any deterioration or malfunction of equipment or structures discovered during an inspection that may lead to an environmental or human health hazard. Cracks in asphalt.	None	Multiple	525	Cold patch repairs were performed at Pad 10 on September 5, 2019. N3B performed an extent of condition in September 2019 to ensure cracks in permitted areas across Technical Area 54 (TA-54) are appropriately repaired. At no time has a condition occurred that would present an environmental or human health hazard regarding asphalt cracks.
6/1/2018	Dome 49	Permit Condition 3.6(1)	Improper labeling	None	Multiple	170	Containers relabeled
10/2/2018	Area L	Permit Condition 2.6	Multiple eyewash and safety showers out of inspection	None	Multiple	9	Inspected and tags replaced
11/1/2018	Building 412	Permit Condition 2.6	Eyewash out of inspection	None	1	75	Inspected and tag replaced
11/15/2018	Building 8	Permit Condition 2.6	Eyewash out of inspection	None	1	61	Inspected and tag replaced
11/20/2018	Dome 48	Permit Condition 2.6.2	Holes in domes	None	1	Ongoing	Verbally notified NMED on January 23, 2019. Received NOV from NMED on March 27, 2019. Developed compliance schedule with NMED for dome structural repairs. N3B is on track for repairs to be completed by December 31, 2019.
1/4/2019	Area G	Permit Condition 2.6.2	All domes have snow blocking doors	None	Multiple	7	Snow removed from doorways, when safe to do so
1/4/2019	Domes 229 and 230	Permit Section 1.9.12	Snow/precipitation on drums	None	Multiple	7	Snow removed from containers
1/7/2019	Unspecified Domes	Permit Section 1.9.12	Snow/precipitation on drums	None	Multiple	2	Precipitation removed from containers
1/7/2019	Domes 229 and 230	Permit Section 1.9.12	Failure to report, both orally and written, any noncompliance that may endanger human health and the environment	None	2	16	Verbally notified NMED on January 23, 2019. Received NOV from NMED on March 27, 2019. Significantly improved verbal notification process with NMED.
1/7/2019	Domes 229 and 230	Permit Condition 2.6.2	Failure to remedy any deterioration or malfunction of equipment or structures discovered during an inspection that may lead to an environmental or human health hazard and mitigate such deterioration or malfunction within 24 hr of discovery	None	2	Ongoing	Verbally notified NMED on January 23, 2019. Received NOV from NMED on March 27, 2019. Developed compliance schedule with NMED for dome structural repairs. N3B is on track for repairs to be completed by December 31, 2019.
1/7/2019	Dome 230	Permit Condition 3.7.1(2)	Snow/precipitation in sump	None	1	156	Melted precipitation allowed to evaporate
1/7/2019	Dome 230	Permit Condition 3.6(1)	Improper labeling	None	2	1	Containers relabeled
2/28/2019	Dome 153	Permit Condition 3.6(1)	Improper labeling	None	1	1	Container relabeled
3/19/2019	Dome 232	Permit Condition 3.6(1)	Improper labeling	None	2	1	Containers relabeled
3/19/2019	SE of Dome 215	Permit Condition 2.6	Safety eye wash shower out of inspection	None	1	43	Inspected and tag replaced
3/26/2019	Dome 49	Permit Condition 3.6(1)	Improper labeling	None	2	1	Containers relabeled
4/1/2019	Building 412 & Dome 283	Permit Condition 2.6	Fire extinguishers out of inspection	None	Multiple	3	Inspected and tags replaced
4/12/2019	Dome 283	Permit Condition 3.6(1)	Improper labeling	None	1	1	Container relabeled
4/15/2019	Dome 232	Permit Condition 3.6(1)	Improper labeling	None	5	1	Containers relabeled
4/29/2019	Building 8	Permit Condition 2.3.1	Failure to store hazardous waste for less than 1 yr from the date that the wastes were first placed into storage. A 55-gal. drum storing hazardous waste gasoline and contaminated absorbents with start date of 1/30/2018.	None	1	226	Container was shipped off-site for disposal on September 12, 2019. N3B also performed an extent of condition to verify that no additional waste in storage exceeded the 1-year storage limit.

Table 1 (continued)

Date of Discovery	TA-54 Permitted Unit Location	Permit Section	Noncompliance Description	Quantity of Material Spilled	Number of Noncompliance Instances	Days Out of Compliance	Corrective Actions Taken
4/29/2019	Building 8	Permit Condition 2.6.2	Failure to remedy within 24 hr any deterioration or malfunction of equipment or structures discovered during an inspection that may lead to an environmental or human health hazard. Cracks in asphalt present on Pad 10.	None	1	279	No conditions occurred that would present an environmental or human health hazard since no liquid hazardous waste was stored on the pad. Cold patch repairs were performed September 5, 2019. N3B performed an extent of condition to ensure cracks in permitted areas across TA-54 are appropriately repaired.
4/29/2019	Building 8	Permit Condition 3.6(1)	Failure to store hazardous waste in containers with all applicable EPA hazardous waste numbers. A 55-gal. drum storing hazardous waste gasoline and contaminated absorbents without a D018 (benzene) waste number.	None	1	454	Container was re-labeled with correct EPA waste codes on April 29, 2019.
4/29/2019	Domes 229 and 230	Permit Condition 3.5.1(5)	Failure to ensure that containers of hazardous waste that are stored outdoors and are not being actively managed are protected from contact with precipitation using weather protective equipment (e.g., containment shell, secured tarp) or are protected by the design of the equipment. Precipitation found on numerous containers in both Dome 229 and Dome 230	None	Multiple	1	Precipitation removed from drums and drums covered with secured tarps
4/29/2019	Building 501	40 Code of Federal Regulations 262.11	Failure to conduct an accurate waste determination. Waste determinations reassessed for unused/unspent products.	None	2	1	Three unused/unspent products, deemed wastes, were reassessed for disposal as RCRA waste. Two unused/unspent products were determined to be disposed of as RCRA waste. The third was nonhazardous.
7/17/2019	Pad 10	Permit Condition 3.6(1)	Improper labeling	None	1	1	Container relabeled
9/3/2019	Dome 153	Permit Condition 3.6(1)	Improper labeling	None	4	1	Containers relabeled