



ESHID-603645

Environmental Protection & Compliance Division

P.O. Box 1663, MS K491
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National Nuclear Security Administration

Los Alamos Field Office

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Date:

Symbol: EPC-DO-21-223

LA-UR: 21-26865

Locates Action No.:

Mr. Ricardo Maestas, Acting Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

**Subject: Class 1 Permit Modification Request to the Los Alamos National Laboratory
Hazardous Waste Facility Permit, EPA ID# NM0890010515**

Dear Mr. Maestas:

The purpose of this letter is to respectfully notify the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) of a Class 1 permit modification request to revise an attachment to 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) to manage, store, and treat hazardous waste at LANL. This permit modification provides changes to the Contingency Plan in Permit Attachment D and includes updates for the contacts for the Primary and Alternate Incident Response Commanders, identified as the functional equivalent of the Emergency Coordinator (40 CFR §264.55).

Triad and DOE prepared this permit modification request in accordance with Title 40 of the Code of Federal Regulations (40 CFR) §270.42(a)(I). Changes made to the Permit as part of this modification fall under the conditions of Appendix I of 40 CFR §270.42 for Class 1 permit modifications. A full description of the permit modification with a rationale for the classification type, a signed certification page, and the proposed changes to Attachment D are included in Enclosure 1.

Three hard copies and one electronic copy of this submittal are included with this letter. The hardcopy submittal contains pages or sections where text has been updated, rather than the entire Permit Attachment. 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.

Notice of this permit modification request 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 NMED-HWB incorporating the changes.

If you have comments or questions regarding this permit modification, please contact Karen Armijo (NA-LA) at (505) 221-3664 or Patrick Padilla (Triad) at (505) 412-0462.

Sincerely,

JENNIFER
PAYNE (Affiliate)

Digitally signed by JENNIFER
PAYNE (Affiliate)
Date: 2021.07.20 16:25:25
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Jennifer E. Payne
Division Leader
Environmental Protection and Compliance Division
Triad National Security, LLC
Los Alamos National Laboratory

Sincerely,

Karen E.
Armijo

Digitally signed by Karen
E. Armijo
Date: 2021.07.21
11:14:25 -06'00'

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

JEP/KEA/PLP/KVH:

Enclosures (s): 1) Class 1 Permit Modification Request to Update Contact Information in the Los Alamos National Laboratory Hazardous Waste Facility Permit

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Date: **JUL 22 2021**
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Mr. Ricardo Maestas, Acting Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
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**Subject: Class 1 Permit Modification Request to the Los Alamos National Laboratory
Hazardous Waste Facility Permit, EPA ID# NM0890010515**

Dear Mr. Maestas:

The purpose of this letter is to respectfully notify the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) of a Class 1 permit modification request to revise an attachment to 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) to manage, store, and treat hazardous waste at LANL. This permit modification provides changes to the Contingency Plan in Permit Attachment D and includes updates for the contacts for the Primary and Alternate Incident Response Commanders, identified as the functional equivalent of the Emergency Coordinator (40 CFR §264.55).

Triad and DOE prepared this permit modification request in accordance with Title 40 of the Code of Federal Regulations (40 CFR) §270.42(a)(l). Changes made to the Permit as part of this modification fall under the conditions of Appendix I of 40 CFR §270.42 for Class 1 permit modifications. A full description of the permit modification with a rationale for the classification type, a signed certification page, and the proposed changes to Attachment D are included in Enclosure 1.

Three hard copies and one electronic copy of this submittal are included with this letter. The hardcopy submittal contains pages or sections where text has been updated, rather than the entire Permit Attachment. 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.

Notice of this permit modification request 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 NMED-HWB incorporating the changes.

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ENCLOSURE 1

**Class 1 Permit Modification Request to Update Contact
Information in the Los Alamos National Laboratory
Hazardous Waste Facility Permit**

EPC-DO-21-223

LA-UR-21-26865

Date: **JUL 22 2021**

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Class 1 Permit Modification Request to Update Contact Information in the Los Alamos National Laboratory Hazardous Waste Facility Permit

This document contains a Class 1 Permit Modification Request (PMR) to update the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit). The Permit modifications provided herein have been made by the Department of Energy (DOE) and Triad National Security, LLC (Triad) and are identified using underlined, red text for additions and redline strikeout for deletions. The changes are made in the most recent, November 2020 Word version of the Permit.

Included with this PMR is a certification page in accordance with the requirements of Title 40 of the Code of Federal Regulations (40 CFR) §270.11.

BASIS

This PMR has been drafted in accordance with 40 CFR §270.42 (a)(1) and incorporates updated information that meets the conditions for a Class 1 permit modification without prior approval listed within Appendix I of 40 CFR §270.42. Changes to Permit Section D.1.1 of Attachment D meet the conditions specified in 40 CFR §270.42, Appendix I, Item B.6.d – changes in name, address, or phone number of coordinators or other persons or agencies identified in the plan.

DESCRIPTION

The contacts for the Primary and Alternates Incident Response Commanders were updated in Permit Section D.1.1. All changes are identified using underlined, red text for additions and redline strikeout for deletions.

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CERTIFICATION

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.

**JENNIFER
PAYNE
(Affiliate)**

Digitally signed by
JENNIFER PAYNE
(Affiliate)
Date: 2021.07.19
09:25:36 -06'00'

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

Date Signed

**Karen E.
Armijo**

Digitally signed by Karen
E. Armijo
Date: 2021.07.21
11:14:49 -06'00'

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

Date Signed

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ATTACHMENT D
CONTINGENCY PLAN

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4. The IC (*e.g.*, Incident Response Commander) coordinates all groups and agencies responding to the emergency and personnel operating at the scene using the ICS. The General Hazardous Waste Emergency Notification System, illustrated on Figure D-1, is designed to expand and contract, as appropriate, to include the response groups/agencies needed to address any particular emergency. The EOSC provides notification to on-site and off-site groups and agencies for both response requests and information.

5. The IC may appoint and utilize a network of support personnel to assess, plan for, and mitigate emergencies. These personnel can include, but are not limited to, a Safety Officer, a Public Information Officer, and a Liaison Officer that report directly to the IC and are responsible for issues related to safety, information, and the interaction of various groups associated with the overall emergency. Also reporting directly to the IC are an Operations Section Chief, Logistics Section Chief, Planning Section Chief, and an Administrative Section Chief. The Operations Section Chief oversees the Fire Branch, the Emergency Medical Services Branch, and the emergency response organization, and is responsible for mitigating the emergency response. The Logistics Section Chief is responsible for providing support personnel and equipment necessary for the emergency response. The Planning Section Chief is responsible for planning the mitigation and recovery activities for the emergency. The Administrative Section Chief is responsible for keeping records of expenditures. These ICS positions are listed in Figure D-1. The appropriate ICS positions will be activated as the emergency warrants. During an emergency at the Facility, assistance may be provided to the IC and the IC's appointees by a large variety of response groups/agencies. The responsibilities and/or assistance available from the various response groups/agencies are discussed briefly in Attachment Sections D.1.2 through D.1.7 and the appropriate representatives will be contacted during an emergency as appropriate.

6. The Permittees shall provide a copy of this Contingency Plan and any revisions to each of the emergency response groups/agencies (including the LAPD, LAFD, LAMC, and the State of New Mexico's Department of Homeland Security and Emergency Management (DHSEM) Area 3 Emergency Management Coordinator).

D.1.1 Emergency Management

1. The Permittees shall delegate the authority and responsibility for administering and implementing the Facility's emergency management program to the emergency management organization. Emergency management personnel shall coordinate and issue the Facility's Los Alamos National Laboratory and Los Alamos Field Office Hazardous Materials Program Plan; emergency management personnel provide response coordination for emergencies. Emergency management personnel provide a 24-hour EOSC for the Facility and a 24-hour Incident Response Commander to respond to emergencies, including hazardous and mixed waste releases. The Incident Response Commander is the functional equivalent of the Emergency Coordinator (40 CFR § 264.55). The emergency management organization maintains an Emergency Operations Center (EOC) in a ready condition, should a center be required. The primary EOC is located at TA-69, Building 33 (TA-69-33). An alternate mobile EOC is equipped and ready for

immediate deployment. Should an EOC be activated during an emergency, additional emergency personnel can be requested by the IC through the EOOSC.

2. Assignment as the Incident Response Commander is rotated. The Incident Response Commander can be reached 24 hours a day by contacting the EOOSC at 505-667-2400.

3. The Incident Response Commander will respond to emergency incidents involving the release of hazardous or mixed waste to the environment, including spills, fires, and explosions. With input from the appropriate Facility groups, the Incident Response Commander shall initially assess the possible hazards to human health or the environment and, if assuming incident command, shall use whatever response personnel and/or emergency equipment necessary to control and contain the waste. In the event of an emergency, the Incident Response Commander typically becomes the IC with full responsibility for field activities. As described previously, the exception to this is when on-site personnel can adequately address the emergency and maintain incident command internally.

4. The Incident Response Commander responding to an emergency shall have access to various tools to include Emergency Actions Levels with prescribed protective actions and ChemLog with a current chemical inventory of the appropriate building(s) in the area in which the incident is occurring. Access to these tools shall be maintained at the facility and made available to the Incident Response Commander and other emergency response members at the EOC. Additionally, this information may be gained from the facility manager where a waste management unit is located. The various response groups shall obtain specific information, if necessary, relating to the facilities involved (including the layout of all affected buildings; the location of evacuation routes, equipment, and personnel; properties of the materials/wastes managed at the facility; and the hazards associated with these materials/wastes) from other site-specific information.

5. The Permittees shall ensure that the names, addresses, and telephone numbers listed below are the current Primary and Alternate Incident Response Commanders.

Primary:

Ted Ulibarri~~Ron Huerta~~
County Road 88~~P.O. Box 923~~
Santa Fe~~Alcalde~~, NM 87506~~87511~~
(W) 505-667-3463~~2400~~
(C) 505-412-8737~~434~~
(P)h) 505-852-0286

Alternates:

~~Jeremy Grondin
6940 Napoleon Road NE
Rio Rancho, NM 87144
(W) 505-667-2400
(C) 505-695-3353
(W) 505-500-7160~~

Steve Mullins
112 Azure
White Rock, NM 87547
(W) 505-667-2400
(C) 505-695-3161
(H) 505-514-1116

~~J. Ted Collins (Ted) Ted Ulibarri
3230 Nizhone Drive County Rd. 88
Santa Fe, NM 875076
(W) 505-606-973067-2400
(C) 505-695-3004 412-8737
(H) 505-309-2761 614-4010~~

6. To assure timely notifications and immediate response during an emergency, the Permittees shall ensure that the telephone numbers 911 or 505-667-2400 are contacted to obtain the on-call Incident Response Commander.

D.1.2 Hazardous Materials Response

1. Hazardous Materials (HAZMAT) personnel are responsible for the aggressive mitigation of chemical, radiological, hazardous waste, and mixed waste emergencies, including field decontamination of responders and response equipment. At the request of the IC, the HAZMAT personnel may provide limited field decontamination support for victims. HAZMAT personnel are capable of providing a decontamination station at the scene of a hazardous material incident to process people working in a contaminated area and is prepared to perform decontamination of personnel. HAZMAT personnel shall meet the training criteria for emergency response personnel specified in the Code of Federal Regulations, Title 29, §1910.120(q)(6)(iii), (iv), and (v). HAZMAT personnel act as part of the ICS reporting directly to IC, or the Operations Section Chief if the position is staffed.

2. During an emergency response, the HAZMAT personnel may also provide site field monitoring to determine the nature and extent of contamination, provide information on correct handling of chemicals, make recommendations on protective clothing and equipment, and provide exposure and treatment information to responders. The field monitoring team leader supervises field monitoring activities to determine the boundaries of the potential release. The HAZMAT personnel may obtain resources from environmental monitoring groups, such as health physics and industrial hygiene personnel.