Los Alamos NATIONAL LABORATORY

ESHID-603688

Environmental Protection & Compliance Division
P.O. Box 1663, MS K491
Los Alamos, New Mexico 87545
(505) 667-2211

National Nuclear Security Administration Los Alamos Field Office
3747 West Jemez Road, MS A316
Los Alamos, New Mexico 87544
(505) 667-5105, Fax (505) 667-5948

Symbol: EPC-DO-22-079
Date: March 25, 2022
LA-UR: 22-22068

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

Subject: Response to New Mexico Environment Department Comments to the Final Second Independent Triennial Review Report, Los Alamos National Laboratory
EPA ID #NM0890010515

Dear Mr. Shean:

The U.S. Department of Energy and its field offices, the National Nuclear Security Administration Los Alamos Field Office (NA-LA) and the Office of Environmental Management Los Alamos Field Office (EM-LA), together with Triad National Security, LLC (Triad) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B), collectively the Permittees, submit the enclosed response to the New Mexico Environment Department-Hazardous Waste Bureau letter dated January 26, 2022. The letter, *NMED Comments Final Second Independent Triennial Review Report Los Alamos National Laboratory EPA ID #NM0890010515, HWB-LANL-20-MISC*, was issued after review of the Permittees' submittal of the *Supplemental Environmental Project: Second Independent External Triennial Review* prepared by Parsons Corporation.

If you have questions or comments for Triad concerning this response, please contact Carol Brown (NA-LA) at (505) 252-8683 or Patrick L. Padilla (Triad) at (505) 412-0462.

If you have questions or comments for N3B concerning this submittal, please contact Arturo Duran (EM-LA) at (505) 257-7907 or Emily Day (N3B) at (505) 695-4243.

Sincerely,

JENNIFER PAYNE (Affiliate)

Digitally signed by JENNIFER PAYNE (Affiliate)
Date: 2022.03.23 18:41:26 -06'00'

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

Sincerely,

P. Erika Baeza-Wisdom

Digitally signed by P. Erika Baeza-Wisdom
Date: 2022.03.25 12:50:04 -06'00'

Erika Baeza-Wisdom
Deputy Manager
National Nuclear Security Administration
Los Alamos Field Office
U.S. Department of Energy

JEP/MW/PLP:dt

Enclosure: Response to New Mexico Environment Department Comments to the Final Second Independent Triennial Review Report, EPA ID #NM0890010515

Copy:
Christopher Catechis, NMED, Santa Fe, NM, chris.catechis@state.nm.us
Neelam Dhawan, NMED-HWB, Santa Fe, NM, neelam.dhawan@state.nm.us
Siona Briley, NMED-HWB, Santa Fe, NM, siona.briley@state.nm.us
Theodore A. Wyka, NA-LA, theodore.wyka@nnsa.doe.gov
Stephen Hoffman, NA-LA, stephen.hoffman@nnsa.doe.gov
Peter Maggiore, NA-LA, peter.maggiore@nnsa.gov
Erika Baeza-Wisdom, NA-LA, erika.wisdom@nnsa.doe.gov
Jason Saenz, NA-LA, jason.saenz@nnsa.doe.gov
Darlene Rodriguez, NA-LA, darlene.rodriguez@nnsa.doe.gov
Karen E. Armijo, NA-LA, karen.armijo@nnsa.doe.gov
Marcus Pinzel, NA-LA, marcus.pinzel@nnsa.doe.gov
Carol A. Brown, NA-LA, carol.brown@nnsa.doe.gov
Silas DeRoma, NA-LA, silas.deroma@nnsa.doe.gov
Stephen Jochem, NA-LA, stephen.jochem@nnsa.doe.gov
Michael Mikolanis, EM-LA, michael.mikolanis@em.doe.gov
David Nickless, EM-LA, david.nickless@em.doe.gov
Cheryl Rodriguez, EM-LA, cheryl.rodriguez@em.doe.gov
John H. Evans, EM-LA, john.h.evans@em.doe.gov
M. Lee Bishop, EM-LA, lee.bishop@em.doe.gov
Elizabeth Churchill, EM-LA, elizabeth.churchill@em.doe.gov
Arturo Duran, EM-LA, arturo.duran@em.doe.gov
Jesse Kahler, EM-LA, jesse.kahler@em.doe.gov
Michael W. Hazen, Triad, ALDESHQSS, mhazen@lanl.gov
William R. Mairson, Triad, ALDESHQSS, tmairson@lanl.gov
Jeannette T. Hyatt, Triad, EWP, jhyatt@lanl.gov
Maxine McReynolds, Triad, GC-ESH, mcreynolds@lanl.gov
Cristina Mulcahy, Triad, GC-ESH, mulcahy@lanl.gov
Jennifer E. Payne, Triad, EPC-DO, jpayne@lanl.gov
Kristen A. Honig, Triad, EPC-DO, khonig@lanl.gov
Andrea McLaughlin-Kysar, Triad, EPC-DO, andiek@lanl.gov
Steven L. Story, Triad, EPC-ES, story@lanl.gov

Sarah Holcomb, Triad, EPC-ES, sholcomb@lanl.gov
Terrill W. Lemke, Triad, EPC-ES, tlemke@lanl.gov
Jessica L. Moseley, Triad, EPC-WMP, jmoseley@lanl.gov
Patrick L. Padilla, Triad, EPC-WMP, plpadilla@lanl.gov
Cecilia Trujillo, Triad, EPC-WMP, ceciliat@lanl.gov
Kimberly Lebak, N3B, kim.lebak@em.doe.gov
Joseph Legare, N3B, joseph.legare@em-la.doe.gov
Jeff Holland, N3B, jeff.holland@em-la.doe.gov
Dana Lindsay, N3B, dana.lindsay@em-la.doe.gov
Emily Day, N3B, emily.day@em-la.doe.gov
Jennifer von Rohr, N3B, jennifer.vonrohr@em-la.doe.gov
Pamela Maestas, N3B, pamela.maestas@em-la.doe.gov
William Alexander, N3B, william.alexander@em-la.doe.gov
rcra-prr@lanl.gov
eshqss-dcrm@lanl.gov
locateteam@lanl.gov
epccorrespondence@lanl.gov
lasomailbox@nnsa.doe.gov
n3brecords@em-la.doe.gov
EMLA.docs@em.doe.gov
interface@lanl.gov
N3Binterface@em-la.doe.gov

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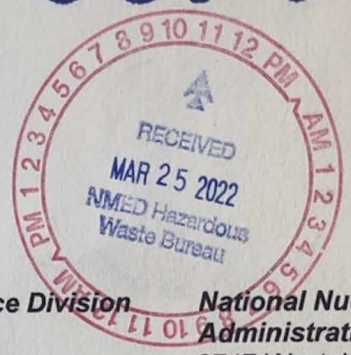

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ENCLOSURE

Response to New Mexico Environment Department Comments to the Final Second Independent Triennial Review Report

EPA ID #NM0890010515

Date: March 25, 2022

U.S. Department of Energy,
National Nuclear Security Administration Los Alamos Field Office, and
Environmental Management Los Alamos Field Office

Los Alamos
NATIONAL LABORATORY

Response to New Mexico Environment Department Comments to the Final Second Independent Triennial Review Report

Introduction

Although the Permittees participated as audited entities in the process, the methods used in the Second Independent External Triennial Review Report and the report content were not under the control of the Permittees. The New Mexico Environment Department's (NMED's) letter addresses concerns with the sufficiency of the independent external auditor methodologies or written conclusions for closed observations. Although the Permittees concur in the closure status of these observations, the Permittees cannot address external independent auditors' processes or methodologies. The Permittees have addressed all potential regulatory violations or operational deficiencies that could lead to potential environmental regulatory violations identified by the independent external auditor in the Second Independent Triennial Review Report. Nevertheless, the Permittees have endeavored to provide responses to comments in the NMED letter for the Los Alamos National Laboratory (LANL) Facility.

The following provides response to NMED's comments by United States Department of Energy and its field offices, the National Nuclear Security Administration Los Alamos Field Office (NA-LA) and the Office of Environmental Management Los Alamos Field Office (EM-LA), in association with Triad National Security, LLC (Triad) and Newport News Nuclear BWXT-Los Alamos, collectively the Permittees.

1. Section 3.1.2 Management, page 3-5

Statement in Report: *The Review Team discovered communication gaps in a couple instances between N3B and Triad and in relaying relevant information to field personnel. The Review Team identified opportunities for improving communication, automating notifications, and further formalizing processes.*

NMED Comment: The intention of these reviews is for the Permittees, in coordination with external entities, to periodically review methods, procedures and ability to meet permit conditions, and make corrections to improve their waste management. Vague statements, or lack of documentation, makes it difficult for NMED to evaluate if the review was successful and if corrective measure was implemented. NMED provided this comment originally to the draft version of the report, but it was not adequately addressed in the final draft. "It is unclear from this statement what relevant information is not relayed to field staff, nor the frequently [frequency] that this has been an issue. Please clarify what information was not relayed, and the frequency of missed communication by N3B managers." The Permittee must provide this information so that NMED can evaluate if it was corrected as part of the triennial review.

Permittee Response (EM-LA/N3B): The Final Supplemental Environmental Project (SEP) Second Triennial Report, Appendix A.2, Observation No. IP-001, documents information provided to the Parsons Team to address the communication gap. Based on the provided information, the observation was closed before issuance of the Final Report.

Newport News Nuclear BWXT Los Alamos (N3B) reviews documentation provided by Triad for potential impacts to Individual Permit (IP) Sites. These reviews include requests for additional information, mapping of potential impacts, field walk-downs of potential impacts, and follow-up meetings. When N3B determines that there could be an impact to IP Sites, weekly field inspections are

conducted until Triad activities cease, and these inspections are documented annually in the Site Discharge Pollution Prevention Plan (SDPPP). In addition, to promote open communication, Triad and N3B have monthly meetings to discuss specific project impacts.

The Parsons Team for the IP arrived for field visits the first working day after a site-wide rain event of substantial intensity. Because of this timing, the IP field team was performing best management practice (BMP) inspections and sample collection as required by the IP and, therefore, were not available to visit site monitoring areas with the Parsons Team. Escorts who are familiar with the IP but are not currently assigned to work on field activities associated with the IP were made available to the Parsons Team. Thus, when questioned in the field, some instances were identified where new information had not been relayed to the escorts. Regular communication occurs between N3B management and field personnel assigned to the IP field activities.

2. Section 3.1.2 Management, page 3-5

Statement in Report: *Plans to expand the telemetry system to more sites are currently underway. The Review Team found that the use of the telemetry technology demonstrates a BMP for both convenience and efficient use of resources, further ensuring compliance with permit inspection requirements.*

NMED Comment: In 2020, the batteries at the samplers at LA /Pueblo canyon were not replaced and one month of data from the telemetry samplers was not collected and transmitted. The Permittees plan to expand the telemetry system should also include periodic battery replacements and system check. The Permittees must demonstrate that they are able to maintain the current telemetry system, and the Permittees plans to review and improve their telemetry system prior to expanding it.

Permittee Response (EM-LA/N3B): Battery replacement was not the issue that caused the data gap referenced above by NMED. On June 4, 2020, the bubbler pressure sensor at Pueblo Canyon gaging station E059.8 malfunctioned. Field teams were unable to visit the site due to the COVID-19 pandemic. On March 24, 2020, fieldwork was paused except for activities necessary to ensure the safety of the public, the workers, and the environment. On July 14, 2020, when fieldwork resumed, field crews visited gaging station E059.8 to troubleshoot and repair the bubbler sensor. During this site visit, the field team recalibrated the bubbler sensor, and it appeared to be functioning; however, subsequent inspections and field visits indicated that the bubbler was not functioning. The decision was made to replace the bubbler with a radar sensor. On August 6, 2020, the radar sensor was installed. More details can be found in the *2020 Monitoring Report for Los Alamos/Pueblo Watershed Sediment Transport Mitigation Project* (EMID-701372).

While the COVID-19 safety precautions were in place, field crews relied heavily on the existing gaging station telemetry system (a different system than what was referenced in the Parsons Report) to perform daily checks of sensor functionality and battery voltage. In fact, it was the telemetry system that alerted field crews to the bubbler malfunction at E059.8. Radiotelemetry at gaging station E059.8 was functioning and reporting throughout this period. Based on precipitation and streamflow measurements at the gaging stations upstream and downstream of E059.8 from June 4, 2020, to August 6, 2020, no precipitation or streamflow occurred during that period that would have triggered sample collection, so no sampling events were missed while the bubbler was malfunctioning.

The referenced statement in the SEP Second Triennial Report refers to the IP remote telemetry units network used for prioritizing IP sampler inspections for the large network of IP samplers at remote locations. It is unrelated to the Los Alamos/Pueblo Canyon gaging station radiotelemetry network, which transmits gaging station sensor and battery data every 5 minutes from the gaging stations to N3B's environmental monitoring database.

The telemetry systems are checked first thing each business day to ensure functionality. Both the IP and gaging station telemetry systems are often the first indication to field crews to perform a field inspection to determine if maintenance needs to be performed or if batteries need to be replaced. This practice increases efficiency and creates a faster response time from when a problem is discovered to when it is fixed. A field visit is conducted at least once every 30 days to each gaging station and at least once every 45 days to each IP sampler to check batteries to make sure they are working and document the voltage.

3. Section 3.5.3 Storage, page 3-16

Statement in Report: *Storage observations were closed by the respondent taking appropriate action to correct issues.*

NMED Comment: Please clarify if these improper storage issues were documented in the annual non-compliance report, and how this issue was resolved. While Section 4.5.3 provides recommendations, it does not provide information about what was done to correct improper storage practices nor to prevent re-occurrence, so that NMED can evaluate if it was corrected as part of the triennial review.

Permittee Response (NA-LA/Triad): Storage observations for containers managed by Triad, included Observation Numbers HW-006, HW-008, and HW-025. These observations were identified in generator accumulation or storage areas that are not under the requirements of the LANL Hazardous Waste Facility Permit because they are not permitted units and, therefore, were not included on the annual noncompliance report required by Permit Section 1.9.14. Each instance was corrected as follows:

- Observation HW-006. A waste oil drum was found not completely located on the secondary containment provided for the drum. The drum was immediately repositioned to be completely on the secondary containment.
- Observation HW-008. A waste container in a central accumulation area had insufficient secondary containment because the secondary containment would not hold the capacity of the contents of the drum should the integrity of the drum fail. It is best practice to use a secondary containment that is large enough to hold the contents of the container for which it provides containment in case the main container fails. The waste container was shipped the next day, and following the observation, the waste management coordinator ordered a new secondary containment with the capacity of storing up to 55 gallons.
- Observation HW-025. A container that should have been located within a satellite accumulation area was found outside the designated hazardous waste storage area. The container was immediately moved to the satellite accumulation area.

Observations that were corrected immediately, such as the above observations described within the Parsons Triennial Review Report, serve as training and requirement reminders for personnel who work in the area. The observations provide the opportunity to implement a corrective action, evaluate applicable requirements, and educate personnel to prevent reoccurrence of these types of issues.

Permittee Response (EM-LA/N3B): Of the five observations noted by Parsons in the referenced section, two (observations HW-034 and HW-035) are attributable to N3B operations.

Observation HW-034 was noted due to the condition of perimeter curbing that did not prevent the run-on/run-off of storm water to/from permitted unit Dome 153. The observation indicated that during a rain event, storm water intrusion occurred from underneath the southeast corner perimeter curb. In response, N3B implemented short-term corrective measures to address this condition until permanent repairs were completed. On July 6, 2021, sandbags were put in place to prevent water from running underneath the perimeter curb. During the week of August 23, 2021, final curb repairs were completed. Photographic

documentation was provided to Parsons, and observation HW-034 was closed in the final report. Weekly inspections of the areas in question are performed; there have been no additional findings. This condition was included in N3B's 2021 noncompliance report.

Observation HW-035 was noted due to improper storage/labeling of lead acid batteries at N3B's Sample Management Office (SMO) located at TA-03-0271. As described in the observation, waste batteries were not containerized or labeled in accordance with universal waste management requirements. On June 29, 2021, the day of discovery, this issue was addressed to the satisfaction of the Parsons inspectors. It was addressed by placing the lead acid batteries in an appropriate container, labeling the container "Batteries for Recycle UN2794 (lead-acid batteries)", and creating a universal waste storage area inside the SMO building in the area where batteries are recharged/serviced. As noted in the final report, observation HW-035 was closed. Because the condition noted by this observation did not occur at a permitted storage unit listed in the Permit and was successfully addressed immediately, this observation was not included in N3B's 2021 Noncompliance Report. Additionally, facility employees were briefed regarding old equipment and battery storage, and the area is inspected by N3B regulatory compliance on a regular basis. There have been no additional findings.

4. Section 3.5.5 Spill/Release, page 3-17

Statement in Report: *Release/Spills observations were closed by respondents taking appropriate actions to correct deficiencies noted for the observation.*

NMED Comment: Please clarify if inaccessible spill kits or inadequate spill kits were documented in the annual non-compliance report, and how these issues were resolved. While Section 4.5.5 and Attachment E provides recommendations, it does not provide information about what was done to correct these deficiencies nor to prevent re-occurrence, so that NMED can evaluate if it was corrected as part of the triennial review.

Permittee Response (NA-LA/Triad): Observations concerning spill kits at generator waste accumulation areas managed by Triad included Observation Numbers HW-002 and HW-009. The identified locations are central accumulation areas that do not fall under the requirements of the LANL Hazardous Waste Facility Permit because they are not permitted units; therefore, the observations were not included in the annual reporting of instances of other noncompliance with the Permit. Resolution of both observations was completed the same day.

- Observation HW-002. A required spill kit was not immediately identified as being present at the central accumulation area. The spill kit was not readily accessible and was not clearly labeled as a spill kit. The required spill kit was immediately moved to a visible location in the central accumulation area, with the label posed for immediate identification.
- Observation HW-009. A spill kit did not contain the required items to manage the corrosive materials present in the central accumulation area. The waste management coordinator obtained a corrosive neutralization kit the same day and placed it in the spill kit at the central accumulation area.

These observations serve as reminders for personnel who work in the area, and the observations and corrective actions provide opportunities to train and/or remind personnel that critical thought in the preparation for a spill is important to ensure that a proper response can be conducted.

Permittee Response (EM-LA/N3B): Observation HW-039 indicated that N3B's satellite accumulation area 6611 located at TA-03 contained waste acids; however, a dedicated spill kit appropriate for acids was not available at the time of Parsons' Team inspection. On August 5, 2021, this issue was successfully

resolved to the satisfaction of the Parsons Inspection Team based on photographic documentation of the updated, dedicated spill kit and its contents and additional training provided to waste management coordinators on proper waste-site setup and required equipment. This issue was identified by N3B in the 2021 noncompliance report.

Appendix A: NPDES Stormwater Individual Permit NM0030759

5. Table A.1.1, Permit Requirement (5), page A-2

Statement in Report: *Method of Compliance: Visual Inspection.*

NMED Comment: In Table A.1.1, the Report states that visual inspection will be the method of compliance to ensure that debris or potentially hazardous wastes will be controlled or minimized into receiving waters. Visual inspect is not a sufficient method of monitoring or ensuring that debris or hazardous wastes are not discharged into receiving waters. In addition to visual inspection, the Permittees must also perform maintenance and as soon as practicable implement appropriate best management practices (BMPs) when necessary to mitigate failing control measures.

Permittee Response (EM-LA/N3B): Visual inspections, according to Permit Part I.E.1 and Part I.G.3, are the primary method used by the Permittee to identify potential action items to ensure that debris or potential contaminants are controlled or minimized into receiving waters. Maintenance activities performed to ensure that debris or hazardous wastes are not discharged into receiving waters are presented in the Permittees' annual update to the SDPPP in accordance with Permit Part I.F.2.

Whenever feasible, maintenance to address findings is completed at the time of inspection. These routine maintenance items include containment/disposal of trash and debris, installation of temporary backup control measures (if existing control measures cannot function as backups for deficient control measures), and minor repairs to control measures to maintain operability. Where immediate response is not feasible, the potential action item is reviewed by the Permittees' field team lead to determine the scope of maintenance required, and a work order is issued to perform the maintenance, with a target date for completion. Maintenance may be delayed because of events outside the Permittees' control, such as access restrictions for sites not under the Permittees' direct control; severe weather conditions (e.g., lightning stand-downs, red flag fire weather work restrictions, winter weather); seasonal biological habitat restrictions (i.e., Mexican spotted owl); and force majeure events (e.g., government shutdowns, essential mission critical activities (EMCA) status, phased operations because of COVID-19 conditions). Response time for maintenance activities is tracked and reported in the annual update to the SDPPP.

Appendix B: NPDES Multi-Sector General Permit NM0028355

6. Section 1.1.6.2(a) Eligibility for "New Dischargers" and "New Sources" for Water-Quality Impaired Waters, page B-4

Statement in Report: *Stormwater controls prevent the discharge of groundwater for metals and polychlorinated biphenyls (PCBs) as well as possible. Stormwater Pollution Prevention Plans (SWPPPs) document procedures.*

NMED Comment: In addition to visual inspection of SWMPP [SWPPP], and the use of BMPs the Permittees must also review monitoring data to confirm metals and PCBs are not present.

Permittee Response (NA-LA/Triad): The National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit (MSGP) number listed above is incorrect. It should be NMR050000 instead of NM0028355.

1. Part 1.1.6.2(a) of the 2021 MSGP is applicable to new dischargers and new sources. The Parsons Triennial Review Report should have indicated that this requirement was not applicable to Triad because Triad is an existing MSGP facility as defined in Table 1-2 of the 2021 MSGP.
2. The review of monitoring data to confirm that metals and PCBs are not present is not a permit requirement in Part 1.1.6.2(a).
3. Triad agrees that it is a good practice to review monitoring data, and such reviews are completed in accordance with 2021 MSGP requirements. Please refer to the compliance discussion for Section 4.2.5, Impaired Waters Monitoring (page B-46) in Appendix B of the Parsons Triennial Review Report, which includes review of sampling records.

Permittee Response (EM-LA/N3B): As part of implementing the requirements of the 2021 MSGP, N3B monitors storm water runoff, collects representative samples for analysis, and reviews data for indications of pollutants.

7. Section 1.1.6.2 (c)(i) and (ii) Eligibility for "New Dischargers" and "New Sources" for Water-Quality Impaired Waters, page B-5

Statement in Report: *For discharges to waters with an applicable EPA-approved or established TMDL, that there are, in accordance with 40 Code of Federal Regulations (CFR) 122.4(i), sufficient remaining waste-load allocations in the TMDL to allow your discharge and that existing dischargers to the waterbody are subject to compliance schedules designed to bring the waterbody into attainment with water quality standards (e.g., a reserve allocation for future growth). Method of Compliance: NOI and SWPPP review.*

NMED Comment: This is not sufficient; the Permittees must utilize confirmation sampling in addition to documenting in NOI and SWPPP, without analysis of samples the Permittees cannot meet the objectives of the second triennial review, please also apply this comment to Section B.1.12.4, as well.

Permittee Response (NA-LA/Triad): The Permittee could not find Section B.1.12.4 in the Parsons Triennial Review Report. Part 1.1.6.2 (c)(i) and (ii) of the 2021 MSGP is applicable to new dischargers and new sources. Triad is an existing discharger and not a "New Discharger" or "New Source." Additionally, Triad does not discharge to total maximum daily load (TMDL) waters. Therefore, the Parsons Triennial Review Report should have indicated this requirement was not applicable. Please refer to the compliance discussion for Section 4.2.5, Impaired Waters Monitoring (page B-46) in Appendix B of the Second Independent External Triennial Review Report, which includes review of sampling records. As part of implementing the requirements of the 2021 MSGP, Triad does monitor and review data.

Permittee Response (EM-LA/N3B): N3B agrees that monitoring storm water, including the analysis of representative samples according to the 2021 MSGP is necessary; however, the referenced section is not applicable to N3B's discharges authorized under the MSGP because neither of the two receiving waters for these discharges have TMDLs.

8. Section 1.2.2.1 (a) and Non-Numeric Technology-Based Effluent Limits (Best Practicable Control Technology/Best Available Technology/Best Conventional Pollutant Control Technology [BPT/BAT/BCT]), page B-7

Statement in Report: *Method of Compliance: Review of discharges.*

NMED Comment: Discharges are allowable only if free from contaminants, the Permittees must provide information of how this information will be reviewed. The current information is not sufficient for NMED to determine if the review was successful.

Permittee Response (NA-LA/Triad): Part 1.2.2.1(a) of the 2021 MSGP is not Non-Numeric Technology-Based Effluent Limits as identified above, but rather applies to discharges from emergency/unplanned fire-fighting activities within the Authorized Non-Storm water Discharges section. The 2021 MSGP does not require sampling and analysis of allowable non-storm water discharges but instead requires the permittee to evaluate such discharges for compliance with the conditions set forth in the permit. All planned discharges are evaluated by Triad personnel to ensure they meet one of the 11 allowable types of authorized non-storm water discharges and the non-numeric effluent limitations identified in Parts 2 and 8 (as applicable) of the 2021 MSGP. An evaluation and signed certification, per the 2021 MSGP requirements, is included in Triad's MSGP SWPPPs to verify no unauthorized non-storm water discharges occur.

Permittee Response (EM-LA/N3B): N3B conducts routine inspections, monitoring and assessments of the MSGP-covered areas in accordance with the permit. Documentation of these actions is certified and submitted to the Environmental Protection Agency (EPA) through quarterly submittals and annual reports.

9. Permit Section 1.2.2.1 Authorized Non-Stormwater Discharges for all Sectors (b) and (c) Minimize Exposure, page B-7

NMED Comment: Discharges are allowable unless water is chlorinated, otherwise water must be dechlorinated water prior to discharge.

Permittee Response (NA-LA/Triad): The 2021 MSGP does not require dechlorination of authorized non-storm water discharges; however, Triad dechlorinates any planned potable water discharge that has the potential to reach a watercourse to ensure that state surface water quality standards are met for chlorine.

Permittee Response (EM-LA/N3B): The 2021 MSGP does not require dechlorination of authorized non-storm water discharges. N3B does not plan to discharge chlorinated water that has the potential to reach a watercourse.

10. Permit Section 2.2.1(f) [1.2.2.1(f)] Authorized Non-Stormwater Discharges for all Sectors, page B-7

NMED Comment: The Permittees must ensure control measures are in place to minimize erosion from wash water.

Permittee Response (NA-LA/Triad): The correct page should be B-8 instead of B-7. Part 1.2.2.1(f) of the 2021 MSGP applies to pavement wash waters. Triad does not wash pavement at its MSGP facilities; however, Triad concurs that control measures to minimize erosion should be in place for similar authorized non-storm water discharges.

Permittee Response (EM-LA/N3B): N3B agrees that control measures are necessary to minimize erosion from discharges, including authorized non-storm water discharges such as certain pavement wash waters.

11. Section 2.1.2.1 Minimize Exposure, page B-19

Statement in Report: *Industrial materials do not need to be enclosed or covered if stormwater from affected areas does not discharge pollutants to waters of the United States or if discharges are authorized under another NPDES permit. Note: Industrial materials do not need to be enclosed or covered if stormwater from affected areas does not discharge pollutants to waters of the United States or if discharges are authorized under another NPDES permit.*

NMED Comment: The Permittees must cover and enclose all industrial materials to protect Waters of the State. See New Mexico Administrative Code (NMAC) 20.6.2 and 20.6.4.

Permittee Response (NA-LA/Triad): The text in the Statement in Report identified above is from a note associated with Part 2.1.2.1 of the MSGP and is not a comment from Parsons about Triad activities. As stated in the note, according to the 2021 MSGP, industrial materials do not have to be covered or enclosed if storm water from affected areas does not discharge pollutants to waters of the United States. Triad acknowledges that Waters of the United States and Waters of the State are mostly congruent. Therefore, if a discharge of pollutants does not occur, the presumption would be that "Waters of the State" would also be protected.

Permittee Response (EM-LA/N3B): N3B agrees that industrial materials must be covered and/or enclosed to protect Waters of the State. BMPs are documented in facility-specific storm water pollution prevention plans.

12. Section 2.1.2.4 (f) Spill Prevention and Response, page B-22

Statement in Report: *This is a permit requirement identified in Part 2.1.2.4 (f) of the 2021 MSGP, not a permittee statement. Develop training on the procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases. As appropriate, execute such procedures as soon as possible.*

NMED Comment: Permittees must maintain an up-to-date training log and record of SOPs. Permittees must also include or reference, these documents in the SWPPP which is provided to NMED-SWQB.

Permittee Response (NA-LA/Triad): Triad acknowledges that training records must be maintained. Triad personnel training records are considered Official Use Only (OUO) and are therefore not included in the MSGP SWPPPs that are posted on a public website. Required procedures (SOPs) are provided in the MSGP SWPPPs.

Permittee Response (EM-LA/N3B): Applicable training documentation and records of SOPs are incorporated into the site-specific storm water pollution prevention plan maintained onsite for each MSGP-covered facility.

13. Section 2.1.2.8 Employee Training, Evidence of Compliance, page B-24

NMED Comment: Document relevant training certifications and education to ensure compliance team is qualified in pollution prevention methods and techniques.

Permittee Response (NA-LA/Triad): Pursuant to Part 2.1.2.8, "Personnel must be trained in at least the following if related to the scope of their job duties (e.g., only personnel responsible for conducting inspections need to understand how to conduct inspections) . . ." Triad acknowledges that personnel who work in areas where industrial materials or activities are exposed to storm water or who are responsible for implementing activities necessary to comply with the MSGP require training related to the scope of

their job duties. These personnel are trained in accordance with the 2021 MSGP. The individuals who perform inspections and assess compliance with permit requirements additionally maintain Certified Inspector of Sediment and Erosion Control (CISEC) professional certifications. Personnel training records are considered OUO and are therefore not included in the MSGP SWPPPs that are posted on a public website.

Permittee Response (EM-LA/N3B): Pollution prevention and spill response procedures are included in the annual training provided to personnel who implement the MSGP at N3B-controlled facilities. Documentation of training is maintained in the facility-specific storm water pollution prevention plan for each MSGP-covered facility.

14. Section 3.1.1 Section 3 Inspection, Column: Evidence of Compliance, page B-28

NMED Comment: Ensure compliance team is also well versed in surface hydrology and stormwater preventions BMPs.

Permittee Response (NA-LA/Triad): Section 3.1.1 of the 2021 MSGP addresses qualifications for personnel who perform inspections. Appendix A of the 2021 MSGP defines qualified personnel as "those who are knowledgeable in the principles and practices of industrial storm water controls and pollution prevention, and who possess the education and ability to assess conditions at the industrial facility that could impact storm water quality, and the education and ability to assess the effectiveness of storm water controls selected and installed to meet the requirements of the permit." All members of the compliance team who perform inspections meet these qualifications; are well-versed in the principles of surface water flow, storm water control measures and BMPs; and, as identified in item 13 above, maintain CISEC professional certifications.

Permittee Response (EM-LA/N3B): As documented in the facility-specific storm water pollution prevention plan for each MSGP-covered facility, the various members of the storm water pollution prevention team are appropriately qualified for the specific function each member serves. In addition, annual training required for all personnel who implement the MSGP at N3B-controlled facilities includes information pertinent to surface hydrology and storm water prevention BMPs.

B.1.9 CONDITIONS APPLICABLE TO STATES, INDIAN COUNTRY LANDS, OR TERRITORIES

15. Permit Section 9.6.2.1 Evidence of Compliance, B-96

NMED Comment: Multi Sector General Permit settlement requires Per- and Polyfluoroalkyl Substances (PFAS) monitoring for facilities covered by the MSGP that fall within the listed industry categories and that are required to submit a Toxics Release Inventory ("TRI") report for PFAS.

Permittee Response (NA-LA/Triad): Although Triad MSGP sites fall within the listed industry categories, it is not required to submit a TRI report as identified in the paragraph below. The following information was included In Section 3.2.2 on page 3-7 of the Parsons Triennial Review Report.

"The Review Team recognized a late development in the 2021 MSGP regarding the monitoring of per- and polyfluoroalkyl substances (PFAS). The 2021 MSGP contains a New Mexico-specific requirement that PFAS monitoring should be included in the first year of the permit. A settlement agreement (New Mexico Chamber of Commerce vs. New Mexico Environment Department, Surface Water Quality Bureau, Docket No. SWQB-20-71) was reached on May 24, 2021. The settlement limited the monitoring requirement to specific industry categories required to submit a Toxic Release Inventory (TRI) for PFAS.

Since none of the LANL facilities covered under the MSGP are required to report PFAS under the TRI, the PFAS monitoring requirement is no longer applicable."

Permittee Response (EM-LA/N3B): N3B's MSGP-covered facilities are not required to submit TRI reports for PFAS and, therefore, are not subject to PFAS monitoring.

16. Section Part 9.6.2.4, Column: Evidence of Compliance, page B-99

NMED Comment: Include records, monitoring reports, and SWPPPs that supports the claim of no discharges to springs or groundwater.

Permittee Response (NA-LA/Triad): Pursuant to Section 9.6.2.4 of the 2021 MSGP, the EPA must amend the notice of intent (NOI) to include a question for the permittee to indicate whether they anticipate discharging groundwater or spring water from their site. This question is documented in EPA's MSGP NOI NPDES Form 3510-6. Triad certified and documented within its NOI that it does not anticipate the discharge of groundwater or spring water from its facilities.

Permittee Response (EM-LA/N3B): In New Mexico, MSGP Permittees are required to submit additional information to EPA if the facility anticipates a discharge of groundwater or spring water from the facility. N3B does not anticipate discharges of groundwater or spring water from its MSGP-covered facilities. Consequently, the additional information cited in the referenced permit section is not applicable to N3B operations.

Appendix C: (NPDES) Industrial and Sanitary Point Source Outfall Permit NM0028355

17. Part II Other Conditions, Permit Section H5: Toxicity Reduction Evaluation (TRE) Table, Column Title: Evidence of Compliance, page C-26

Statement in Report: *According to LANL, ". . . there were no TRE Action Plans in the last three years."*

NMED Comment: This line of evidence is not sufficient to demonstrate that there were no TRE Action Plans in the last three years against discharge monitoring reports (DMRs). The Permittees must provide reference materials or documentation to verify the claim.

Permittee Response (NA-LA/Triad): NPDES Permit No. NM0028355 (as modified in May 2015) has whole effluent toxicity (WET) test requirements assigned to four (4) outfalls. The TRE requirements and objective evidence for each is described below:

The TRE requirements for Outfall 001 and 03A027 include the following:

1) Part II.G.2.a.ii. "If any of the additional tests demonstrate significant lethal effects at or below the critical dilution, the permittee shall initiate TRE requirements as specified in Item 5 of this section."
2) Part II.G.2.a.iii. "If any two of the three additional tests demonstrate significant sub-lethal effects at 75% or lower, the permittee shall initiate the Sub-Lethal TRE requirement in Part II.G.5 of this section."

Outfall 001 did not meet the requirements to perform a TRE over the last 3 years, as shown in Table C.1 and reported in the DMRs.

Table C.1 – Summary of Whole Effluent Toxicity (WET) Test Results 2018 – 2021

Year	Sample Dates	Fathead Minnow				Ceriodaphnia dubia						Frequency
		Survival "Lethal"		Growth "Sublethal"		Survival "Lethal"			Reproduction "Sublethal"			
		NOEC %	Status	NOEC %	Status	NOEC %	LOEC %	Status	NOEC %	LOEC %	Status	
2018	Feb 12, 14, 16	NR		NR		100	100	Pass	100	100	Pass	Quarterly
2018	June 4, 6, 8	NR		NR		100	100	Pass	75		Fail	Quarterly
2018	July 30, August 1, 3	NR		NR		100	100	Pass	100	100	Pass	Retest 1 of 3
2018	Aug 27, 29, 31	NR		NR		100	100	Pass	100	100	Pass	Retest 2 of 3
2018	Sept 10, 12, 14	NR		NR		100	100	Pass	100	100	Pass	Retest 3 of 3
2018	Oct 22, 24, 26	NR		NR		100	100	Pass	100	100	Pass	Quarterly
2019	Feb 11, 13, 15	NR		NR		100	100	Pass	100	100	Pass	Quarterly
2019	April 28, 30, May 2	NR		NR		100	100	Pass	100	100	Pass	Quarterly
2019	Aug 18, 20, 22	NR		NR		100	100	Pass	32		Fail	Quarterly
2019	Sept 23, 25, 27	NR		NR		100	100	Pass	100	100	Pass	Retest 1 of 3
2019	Oct 21, 23, 25	NR		NR		100	100	Pass	100	100	Pass	Retest 2 of 3
2019	Nov 18, 21, 22	NR				NR				Invalid due to lab error		Retest 3 of 3
2019	Dec 16, 18, 20	NR		NR		100	100	Pass	100	100	Pass	Retest 3 of 3
2020	Jan 27, 29, 31	NR		NR		100	100	Pass	100	100	Pass	Quarterly
2020	May 12, 13, 14	NR		NR		100	100	Pass	100	100	Pass	Quarterly
2020	Aug 17, 19, 21	NR		NR		100	100	Pass	100	100	Pass	Quarterly
2020	Oct 12, 14, 16	100	Pass	100	Pass	100	100	Pass	100	100	Pass	Quarterly
2021	March 8, 10, 12	NR		NR		100	100	Pass	32	42	Fail	Quarterly
2021	April 26, 28, 30	NR		NR		100	100	Pass	100	100	Pass	Retest 1 of 3
2021	May 10, 12, 14	NR		NR		100	100	Pass	100	100	Pass	Retest 2 of 3
2021	June 21, 23, 25	NR		NR		100	100	Pass	75	100	Fail	Retest 3 of 3
2021	July 12, 14, 16	NR		NR		100	100	Pass	100	100	Pass	Retest 1 of 3
2021	Aug 16, 18, 20	NR		NR		100	100	Pass	100	100	Pass	Retest 2 of 3
2021	Sept 13, 15, 17	NR		NR		100	100	Pass	100	100	Pass	Retest 3 of 3
2021	Nov 15, 17, 19	NR		NR		100	100	Pass	100	100	Pass	Quarterly

NOEC = No Observed Effect Concentration
LOEC = Lowest Observed Effect Concentration
NR = Not Reported

Outfall 03A027 did not meet the requirements to perform a TRE (Part II.G.2.a) over the last 3 years because it did not discharge (as reported in the monthly DMRs). This outfall was routed to Outfall 001 in September 2016 and is maintained as a critical backup.

Outfall 13S did not meet the requirements to perform a TRE (Part II H.2.a) over the last 3 years because it did not discharge (as reported in the monthly DMRs). This outfall is routed to Outfall 001 and is maintained as a critical backup.

Outfall 051 does not establish requirements to begin a TRE in the event of multiple test failures (Part III.1.e).

18. Permit Part II Requirements Specific to Bulk Sewage and Sludge for Application to the Land Meeting Class A or B Pathogen Reduction and the Cumulative Loading Rates in Table 2 or Class B Pathogen Reduction and the Pollutant Concentration in Table 3, Permit Requirement 3, page C-50

NMED Comment: Indicate where and how sludge has been stored since 2019 to ensure compliance with CWA section 503 requirements on bio solid and sludge storage and handling.

Permittee Response (NA-LA/Triad): Sanitary sludge is stockpiled on one of the dewatering beds at the TA-46 Sanitary Wastewater System (SWWS) Treatment Facility before being composted (Figure C.1, 2/16/22). Compost is also stored on dewatering beds and stockpiled for eventual land application onsite at LANL (Figure C.1, 2/16/22). Before stockpiling, the compost must meet the pathogen reduction requirements contained in §503.32(a)(i)(7), §503.32(a)(7)(ii), the Pathogen Reduction criteria for a Process to Further Reduce Pathogens, and the vector attraction reduction requirements contained in §503.33(b)(5). The storage of sludge and compost on the dewatering beds captures, collects, and routes precipitation runoff to the SWWS headworks.

The amount of sludge generated and composted is reported to the NMED Solid Waste Bureau in the annual reports provided in Attachment C.1.

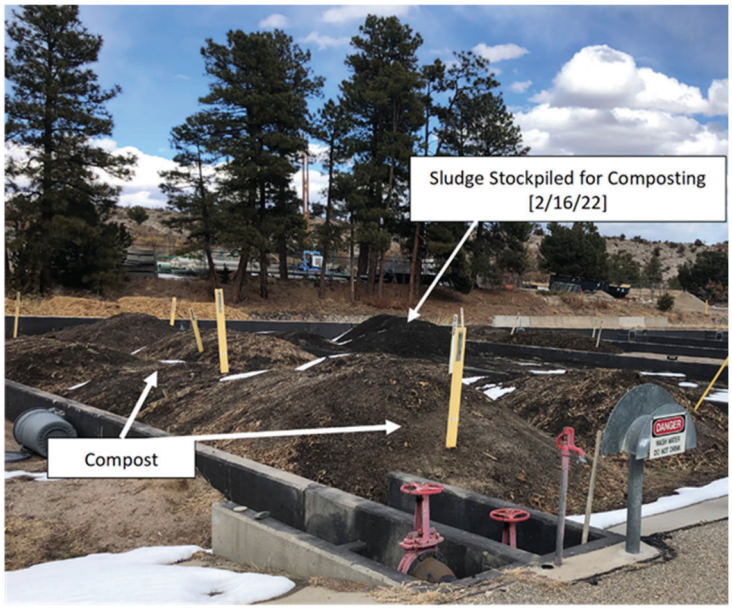

Figure C.1. Photograph of sludge and compost storage at the SWWS Treatment Facility

19. Permit Part IV, Requirements Specific to Sludge Sold or Given Away in a Bag or Other Container Application to the Land that Does Not Meet Minimum Pollutant Concentrations, Method of Compliance), page C-55

Statement in Report: *In all cases, if the person (permit holder) who prepares the sewage sludge supplies the sewage sludge to another person for land application use or to the owner or lease holder of the land, the permit holder shall provide necessary information to the parties who receive the sludge to assure compliance with these regulations.*

NMED Comment: NMED notes that the current NPDES permit term began in 2021. The previous term was 2015. The 2015 and 2021 NPDES permits were both in effect for the time period of the triennial review. The Permittees must verify shipping logs that sludge has not been shipped.

Permittee Response (NA-LA/Triad): The NMED comment appears to be confusing the MSGP and the Industrial and Sanitary Point Source (ISPS) permits. The current term for the NPDES Permit No. NM0028355 ISPS Outfall Permit was effective in October 2014, modified in May 2015, and administratively continued in October 2019 based on a complete permit reapplication submitted in March 2019. The new permit term for the ISPS permit will not start until the EPA issues a new permit sometime this year.

Sludge has been continuously stored onsite at SWWS and has not been land applied or shipped offsite with the exception of the following:

- Land Application at the SWWS Treatment Facility on December 14, 2018, as shown in the photos provided in Attachment C.2
- Shipment in 2019 documented in Attachment C.3

20. Permit Part IV Major Sewage Sludge Requirements, Permit Section IA, page C-57

Statement in Report: *Sewage sludge shall not be applied to the land if the concentration of the pollutants exceeds the pollutant concentration criteria in Table 1 (see table in permit). The frequency of testing for pollutants in Table 1 is found in Element 1, Section I.C.*

NMED Comment: Permittees must state how sludge is disposed of to prove there is no surface disposal.

Permittee Response (NA-LA/Triad): The Laboratory received approval in 2017 to compost sludge at the SWWS Treatment Facility. On December 14, 2018, operations personnel land-applied compost to the grass in and around the SWWS Treatment Facility, as shown in the photographs provided in Attachment C.2. This batch of compost met the pathogen and vector attraction reduction requirements specified in Part IV of the NPDES Permit for Land Application, Table 1, § 503.13. No offsite sludge shipments were made in 2018. One shipment of sludge was shipped offsite in April 2019 (Attachment C.3). All other sludge generated by the SWWS Treatment Facility in 2019 and 2020 was composted, as reported to the NMED Solid Waste Bureau in the annual reports provided in Attachment C.1.

Appendix D: New Mexico Spill Regulations NMAC 20.6.2 1203

21. Table D.1 Compliance Checklist, Permit Section 1203.A(1), Column Title: Method of Compliance, page D-1

NMED Comment: No response present for "Is there training in place for identifying?" The Permittees must provide documentation showing that this was evaluated to assist NMED it its evaluation of if the review was successful.

Permittee Response (NA-LA/Triad): Section 4.4 of the Supplemental Environmental Project: Second Independent External Triennial Review Report (ESHID-603659) states, "The personnel involved in reviewing and responding to spills and unauthorized discharges are well trained." Training is provided to all employees who work at LANL regarding the identification and notification of spills to the environment to ensure that 20.6.2.1203 NMAC requirements are met. Staff responsible for evaluating spills that do occur complete training on 20.6.2.1203 NMAC reporting requirements. Spill response personnel also work with line organizations throughout the Laboratory to raise awareness of spill reporting requirements.

Permittee Response (EM-LA/N3B): As noted by Triad, training on spill identification and response is provided to all employees who work at LANL. In addition, program- and job-specific spill identification and response training is provided to employees based on work function and responsibilities.

Appendix E

22. NMED General Comment: The Permittees have not demonstrated that identified permit violations (e.g., correction of missing spill kits, improper waste storage) have been documented and corrected to prevent reoccurrence.

Permittee Response (NA-LA/Triad): The Parsons Triennial Review Team observations for Triad-managed permitted units are included in *Fiscal Year 2021 Reporting of Releases and Instances of Noncompliance with the Los Alamos National Laboratory Hazardous Waste Facility Permit, Los Alamos National Laboratory, EPA ID #NM0890010515* (ESHID-603668). All storage and spill kit deficiency observations by the Parsons Triennial Review Team for Triad-managed areas occurred in generator accumulation areas; therefore, they were not included in the annual report. All of these observations were corrected immediately or shortly after the observation occurred and seemed to be isolated instances. They do not appear to indicate the symptoms of larger, systemic issues that may warrant formal corrective action plans. Prevention of reoccurrence by Triad is conducted through continued diligent operations by facility personnel and implementing/maintaining suggestions as outlined in the Parsons Triennial Review Report.

Permittee Response (EM-LA/N3B): Through its review of N3B's implementation of the HWFP, the Triennial Review Team identified eight predecisional observations that were noted as potential environmental regulatory violations. In each case, N3B provided appropriate documentation to demonstrate correction of the potential violation such that each predecisional observation was closed. The information provided for each observation is discussed in Appendix E of the Parsons Triennial Review Report. As a result of the triennial review and, specifically, several observations related to the HWFP review, N3B revised procedures, implemented changes to inspection requirements, and provided additional training to promote compliance overall and prevent reoccurrence of potential permit violations. Environmental regulatory violations identified by the triennial review were included in N3B's noncompliance report for 2021.

Acronyms

Acronym	Definition
BMP	best management practice
CISEC	Certified Inspector of Sediment and Erosion Control
CWA	Clean Water Act
DMR	discharge monitoring report
EMCA	essential mission critical activities
EM-LA	Environmental Management Los Alamos (Office, DOE Environmental Management)
EPA	(U.S.) Environmental Protection Agency
IP	Individual Permit
ISPS	Industrial and Sanitary Point Source
LA	Los Alamos (Canyon)
LANL	Los Alamos National Laboratory
LOEC	Lowest Observed Effect Concentration
MSGP	Multi-Sector General Permit
N3B	Newport News Nuclear BWXT Los Alamos
NA-LA	Los Alamos Field Office, NNSA
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NOEC	No Observed Effect Concentration
NOI	notice of intent
NPDES	National Pollutant Discharge Elimination System (Clean Water Act)
NR	Not Reported
OUO	Official Use Only
PFAS	per- and polyfluoroalkyl substances
RCRA	Resource Conservation and Recovery Act
SDPPP	Site Discharge Pollution Prevention Plan
SEP	Supplemental Environmental Project
SMO	Sample Management Office (N3B)
SWQB	Surface Water Quality Bureau (NMED)
SWWS	Sanitary Wastewater System (TA-46)
TA	Technical Area
TMDL	total maximum daily load
TRE	toxicity reduction evaluation
TRI	toxic release inventory

ATTACHMENT C.1

Sludge/Compost Annual Reports 2018, 2019, 2020

EPC-DO-22-079

LA-UR-22-22068

Unclassified

Date: March 25, 2022

Los Alamos
NATIONAL LABORATORY
EST. 1943

Environmental Protection and Compliance Division
Los Alamos National Laboratory
PO Box 1663, K490
Los Alamos, New Mexico 87545
(505) 667-0666

Symbol: EPC-DO: 19-037
LA-UR: 19-20990
Date: FEB 1 3 2019

Ms. Auralie Ashley-Marx
Bureau Chief
New Mexico Environment Department
Solid Waste Bureau, Permit Section
1190 St. Francis Drive, Room S2050
PO Box 5469
Santa Fe, New Mexico 87502

Subject: **2018 Annual Report to NMED Solid Waste Bureau - Sanitary Waste Water System (SWWS) Compost Facility – Registration No. 0215151C**

Dear Ms. Ashley-Marx:

On March 24, 2014, the NMED Solid Waste Bureau approved Los Alamos National Security (LANS), LLC application to operate a compost facility at the Technical Area-46 SWWS Plant (Certificate No. 0215151C). The purpose of this letter and attachments is to fulfill the requirements contained in 20.9.3.27 NMAC for submittal of the 2018 SWWS Compost Facility Solid Waste Annual Report.

In late 2014 the SWWS Compost Facility began full-scale composting of SWWS plant biosolids. Attached are completed 2017 Solid Waste Annual Report forms for this facility. The information provided in this report is true and accurate.

On November 15, 2017 LANS submitted a revised registration application for the SWWS Compost Facility that included a request to change the compost method from a static aerated pile process to an enclosed in-vessel process. NMED approved the facility registration renewal on April 16, 2018. This registration was transferred to Triad National Security, LLC (Triad), effective November 1, 2018.

Compost will be land applied at the Laboratory for landscaping, post construction remediation and other beneficial uses according to the Notice of Intent submitted to NMED on November 12, 2013.

Please contact Robert Gallegos at (505) 665-0450 or by email at rgallegos@lanl.gov if you have questions.

Sincerely,

Taunia S. Van Valkenburg
Group Leader

TVV/MTS/RMG:jdm

Attachment(s): Attachment 1 SWWS Compost Facility - 2018 Solid Waste Annual Report Forms
a. General Information
b. Materials and Solid Water Management
c. Additional Comments

Copy: Joan M. Snider, NMED-SWB, JoanM.Snider@state.nm.us (E-File)
Karen E. Armijo, NA-LA, Karen.armijo@nnsa.doe.gov (E-File)
Cassandra A. Begay, LASO-NS-LP, cassandra.begay@nnsa.doe.gov
Michael W. Hazen, mhazen@lanl.gov (E-File)
William R. Mairson, wmarison@lanl.gov (E-File)
Enrique Torres, EPC-DO, etorres@lanl.gov (E-File)
Taunia S. Van Valkenburg, EPC-CP, tauniav@lanl.gov (E-File)
Andrew W. Erickson, UI-DO, erickson@lanl.gov (E-File)
Lawrence V. Chavez, UI-OPS, lvchavez@lanl.gov (E-File)
Randy E. Vigil, UI-OPS, Vigil, revigil@lanl.gov (E-File)
Michael T. Saladen, EPC-CP, saladen@lanl.gov (E-File)
Robert M. Gallegos, EPC-CP, rallegos@lanl.gov (E-File)
Adesh-records@lanl.gov, (E-File)
epc-correspondence@lanl.gov, (E-File)
epccat@lanl.gov, (E-File)

ATTACHMENT 1

SWWS Compost Facility - 2018 Solid Waste Annual Report Forms

a. General Information

b. Materials and Solid Water Management

c. Additional Comments

EPC-DO: 19-037

LA-UR-19-20990

Date: FEB 1 3 2019

Facility Information January 1-December 31, 2018		Permit or Registration #	Check one	
		0215151C	Closed Facility ☐	Open Facility ☑
County:	Los Alamos			
Facility Name:	Sanitary Waste Water System	Phone#	505.606-2160	
Contact Person:	Randy E. Vigil	Email:	revigil@lanl.gov	
Facility Mailing Address:	P.O. Box 1663 Mail Stop J972			
City:	Los Alamos	State: NM	ZIP Code	87545
Physical Location of Facility (City/County Road)	Los Alamos National Laboratory, TA-46			

Facility Operator:	Randy E. Vigil	Phone:	505-606-2160	
Contact Person:	Randy E. Vigil	E-mail Address:	revigil@lanl.gov	
Mailing Address:	P.O. Box 1663 Mail Stop J972			
City:	Los Alamos	State: NM	ZIP Code	87545

Facility Owner:	Triad National Security, LLC	Phone:	505-665-1126
Contact Person:	Andrew W. Erickson	E-mail:	erickson@lanl.gov
Mailing Address:	P.O. Box 1663 Mail Stop K760		
City:	Los Alamos	State: NM	ZIP: 87545

Landowner:		Phone:	
Contact Person:		E-mail:	
Mailing Address:			
City:		State:	ZIP:

Financial Assurance (Check one box)

☐ Updated Financial Assurance Attached

☐ Financial Assurance required but not attached (Explain on Comment Sheet)

☐ Financial Assurance not required. (Explain on Comment Sheet)

Questions? Call 505-827-0197

Landfills Only

☐ Open Landfill ☐ Closed Landfill

Capacity Information for Open Landfills (if not provided explain on Comment Sheet)

Provide Landfill Capacity USED during 2017 _____ (Cubic Yards)

Provide Remaining Landfill Capacity _____ (Cubic Yards)

Provide Remaining Landfill Life _____ (Years) See Capacity Work Sheet

Number of acres at current site, not permitted, that could be used for disposal in the future. _____

Were there any changes in operations that reduced the active life of the landfill by 25% or more?

☐ NO ☐ YES (Attach Notification)

Monitoring Results for Open Landfills (and Closed Landfill in Post-Closure Care).

☐ NO ☐ YES Summary of Landfill Gas Monitoring Results Enclosed (if no, explain on Comment Sheet)

☐ NO ☐ YES Summary of Landfill Groundwater Monitoring Results Enclosed (if no, explain on Comment Sheet)

☐ NO ☐ YES Summary of Leachate Generated & Treated or Disposed Enclosed (if no, explain on Comments Sheet)

Closure and Post-Closure Activity

Date of Closure: _____

Total Acreage used for disposal as of 12/31/2017 _____ (Acres)

Intermediate Cover: _____ (Acres) Area Seeded: _____ (Acres)

Total Acreage with Final Cover Installed (per Closure Plan) _____ (Acres)

II. 2018 Material and Solid Waste Management Form

Facility Name:	SWWS Compost Facility - LANL	**PRINT Name, Title and Telephone # of the person completing form:**	Randy E. Vigil - Operations Manager 505-606-2160		
County:	Los Alamos	**Permit or Registration #**	**Facility Type**		
		0215151C	Landfill ☐	Recycle ☐	Compost ☑	Transfer Station ☐

	Material Type (See Instructions)	Method Mark One: Weighed ☐	Method Mark One: Estimated ☑	Waste Origin: Amount of In-State Material Received in Tons (a)	Waste Origin: Amount of Out of State Materials Received in Tons (b)	Managed On-site (c): Landfilled or Treated	Managed On-site (d): Recycled Composted or Mulched	Managed On-site e: Beneficially Used	Sent off site to be (f): Treated Disposed Incenerated	Sent off site to be (g): Recycled Mulched Composted	Sent off site to be (h): Benefically Used	Sent to (i): Provide Facility Name, City and State
1	MSW											
2	C&D											
3	Clean Fill											
Special Wastes												
4	Industrial Waste											
5	Regulated Asbestos											
6	Infectious Waste											
7	Ash											
8	PCS											
9	Offal											
10	Bio-Solids (Treated Sewage Sludge)		X	48.5			Composted					Finished compost will be beneficially used at at locations within LANL
11	Other Sludges											
12	Other Special Waste											
Other Materials												
13	Brush/Green Waste		X	11.5			Composted					Finished compost will be used at LANL
14	Scrap Tires											
15	Motor Oil											
16	Antifreeze											
17	Lead Acid Batteries											
18	HHW											
19	Other Wastes											
20	**Total Tons**			**60.0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	

I Certify that the information provided is true and accurate.

Randy E. Vigil, Operations Manager

Date 2/4/19

2018 Additional Comments

Name of Facility:	SWWS Compost Facility - Los Alamos National Laboratory
Name of Person completing form:	Randy E. Vigil

Names of Certified Operators at Facility	
James G. Marquez - Operator ID #147	
John D. Naranjo - Operator ID #2491	Louis O. Romero - Operator ID #4444
Isaiah A. Medina - Operator ID #4196	Jeremy Martinez - Operator ID #4200
Andrew Maestas - Operator ID #4246	Levi J. Salazar - Operator ID #4382

Average Landfill Tipping Fees		**Average Transfer Station Tipping Fees**	
MSW:	**Not Applicable**	**MSW:**	**Not Applicable**
Tires	**Not Applicable**	**Tires:**	**Not Applicable**
Special Waste			

To Be Completed by Facilities Accepting and Storing Tires: Not Applicable:

Number of tires stored on site at the **beginning** of the calendar year (January 1, 2017)		Number of tires stored onsite at the **end** of the calendar year (December 31, 2017)	
Passenger Tires:		Passenger Tires:	
Truck Tires		Truck Tires	
Tire Bales		Tire Bales	

Financial Assurance not enclosed because: (if applicable)

Not required to file financial assurance - SWWS Compost Facility accepts less than 25 per day tons of compostable material

General Comments:

Landfill Information Only:

Gas Monitoring Results not enclosed because:
Not Applicable

Ground Water Monitoring Results not enclosed because:
Not Applicable

Leachate Generation Report not enclosed because:
Not Applicable

Capacity Information not provided because:
Not Applicable

Los Alamos
NATIONAL LABORATORY
EST 1943

Environmental Protection and Compliance Division
Compliance Programs Group
Los Alamos National Laboratory
PO Box 1663, K490
Los Alamos, New Mexico 87545
(505) 667-0666

Symbol: EPC-DO: 20-043
LA-UR: 20-21188
Date: FEB 13 2020

Ms. Joan M. Snider
Acting Bureau Chief
New Mexico Environment Department
Solid Waste Bureau,
1190 St. Francis Drive, Room S2150
PO Box 5469
Santa Fe, New Mexico 87502

Subject: **2019 Annual Report to NMED Solid Waste Bureau - Sanitary Waste Water System (SWWS) Compost Facility – Registration No. 0215151C**

Dear Ms. Snider:

On March 24, 2014, the NMED Solid Waste Bureau approved Los Alamos National Security (LANS), LLC application to operate a compost facility at the Technical Area-46 SWWS Plant (Certificate No. 0215151C). The purpose of this letter and attachments is to fulfill the requirements contained in 20.9.3.27 NMAC for submittal of the 2019 SWWS Compost Facility Solid Waste Annual Report.

In late 2014 the SWWS Compost Facility began full-scale composting of SWWS plant biosolids. Attached are completed 2019 Solid Waste Annual Report forms for this facility. The information provided in this report is true and accurate.

On November 15, 2017 LANS submitted a revised registration application for the SWWS Compost Facility that included a request to change the compost method from a static aerated pile process to an enclosed in-vessel process. NMED approved the facility registration renewal on April 16, 2018. This registration was transferred to Triad National Security, LLC (Triad), effective November 1, 2018.

Compost will be land applied at the Laboratory for landscaping, post construction remediation and other beneficial uses according to the Notice of Intent submitted to NMED on November 12, 2013.

Please contact Robert Gallegos at (505) 665-0450 or by email at rgallegos@lanl.gov if you have questions.

Sincerely,

Taunia S. Van Valkenburg
Group Leader

TVV/MTS/RMG:jdm

Attachment(s): Attachment 1 SWWS Compost Facility - 2019 Solid Waste Annual Report Forms
a. General Information
b. Materials and Solid Water Management
c. Additional Comments

Copy: Genevieve Morgan, NMED-SWB, genevieve.morgan@state.nm.us
Karen E. Armijo, NA-LA, Karen.armijo@nnsa.doe.gov
Cassandra A. Begay, LASO-NS-LP, cassandra.begay@nnsa.doe.gov
Michael W. Hazen, mhazen@lanl.gov
William R. Mairson, ALDESHQSS, wrmairson@lanl.gov
Enrique Torres, EWP, etorres@lanl.gov
Jennifer E. Payne, EPC-DO, jpayne@lanl.gov
Taunia S. Van Valkenburg, EPC-CP, tauniav@lanl.gov
Lawrence V. Chavez, UI-OPS, lvchavez@lanl.gov
Randy E. Vigil, UI-OPS, Vigil, revigil@lanl.gov
Michael T. Saladen, EPC-CP, saladen@lanl.gov
Robert M. Gallegos, EPC-CP, rallegos@lanl.gov
Adesh-records@lanl.gov
epccorrespondence@lanl.gov
epccat@lanl.gov

ATTACHMENT 1

SWWS Compost Facility - 2019 Solid Waste Annual Report Forms

a. General Information

b. Materials and Solid Water Management

c. Additional Comments

EPC-DO: 20-043

LA-UR-20-21188

Date: FEB 12 2020

Facility Information January 1-December 31, 2019		Permit or Registration #	Check one	
		0215151C	Closed Facility ☐	Open Facility ☑

County:	Los Alamos				
Facility Name:	Sanitary Waste Water System	Phone#	505.606-2160		
Contact Person:	Randy E. Vigil	Email:	revigil@lanl.gov		
Facility Mailing Address:	P.O. Box 1663 Mail Stop J972				
City:	Los Alamos	State:	NM	ZIP Code	87545
Physical Location of Facility (City/County Road)	Los Alamos National Laboratory, TA-46				

Facility Operator:	Randy E. Vigil			Phone:	505-606-2160
Contact Person:	Randy E. Vigil			E-mail Address:	revigil@lanl.gov
Mailing Address:	P.O. Box 1663 Mail Stop J972				
City:	Los Alamos	State:	NM	ZIP Code	87545

Facility Owner:	Triad National Security, LLC			Phone:	505-665-1126
Contact Person:	Andrew W. Erickson			E-mail:	erickson@lanl.gov
Mailing Address:	P.O. Box 1663 Mail Stop K760				
City:	Los Alamos	State:	NM	ZIP:	87545

Landowner:				Phone:	
Contact Person:				E-mail:	
Mailing Address:					
City:		State:		ZIP:	

Financial Assurance (Check one box)

☐ Updated Financial Assurance Attached

☐ Financial Assurance required but not attached (Explain on Comment Sheet).

☐ Financial Assurance not required. (Explain on Comment Sheet)

Questions? Call 505-827-0197

Landfills Only

☐ Open Landfill ☐ Closed Landfill

Capacity Information for Open Landfills (if not provided explain on Comment Sheet)

Provide Landfill Capacity USED during 2017 _____ (Cubic Yards)
Provide Remaining Landfill Capacity _____ (Cubic Yards)
Provide Remaining Landfill Life _____ (Years) See Capacity Work Sheet
Number of acres at current site, not permitted, that could be used for disposal in the future. _____

Were there any changes in operations that reduced the active life of the landfill by 25% or more?

☐ NO ☐ YES (Attach Notification)

Monitoring Results for Open Landfills (and Closed Landfill in Post-Closure Care).

☐ NO	☐ YES	Summary of Landfill Gas Monitoring Results Enclosed (if no, explain on Comment Sheet)
☐ NO	☐ YES	Summary of Landfill Groundwater Monitoring Results Enclosed (if no, explain on Comment Sheet)
☐ NO	☐ YES	Summary of Leachate Generated & Treated or Disposed Enclosed (if no, explain on Comments Sheet)

Closure and Post-Closure Activity

Date of Closure: _____

Total Acreage used for disposal as of 12/31/2017 _____ (Acres)
Intermediate Cover: _____ (Acres) Area Seeded: _____ (Acres)
Total Acreage with Final Cover Installed (per Closure Plan) _____ (Acres)

II. 2019 Material and Solid Waste Management Form

Facility Name:	SWWS Compost Facility - LANL	**PRINT Name, Title and Telephone # of the person completing form:**	Randy E. Vigil - Operations Manager 505-606-2160
County:	Los Alamos	**Permit or Registration #**	**Facility Type**
		0215151C	Landfill ☐ Recycle ☐ Compost ☑ Transfer Station ☐

	Material Type (See Instructions)	Method Mark One		Waste Origin		Managed On-site			Sent off site to be:			Sent to:
		Weighed ☐	Estimated ☑	Amount of In-State Material Received in Tons (a)	Amount of Out of State Materials Received in Tons (b)	(c) Landfilled or Treated	(d) Recycled Composted or Mulched	e Beneficially Used	(f) Treated Disposed Incenerated	(g) Recycled Mulched Composted	(h) Benefically Used	(i) Provide Facility Name, City and State
1	MSW											
2	C&D											
3	Clean Fill											
Special Wastes												
4	Industrial Waste											
5	Regulated Asbestos											
6	Infectious Waste											
7	Ash											
8	PCS											
9	Offal											
10	Bio-Solids (Treated Sewage Sludge)		X	48.2			Composted					Finished compost will be beneficially used at at locations within LANL
11	Other Sludges											
12	Other Special Waste											
Other Materials												
13	Brush/Green Waste		X	12.0			Composted					Finished compost will be used at LANL
14	Scrap Tires											
15	Motor Oil											
16	Antifreeze											
17	Lead Acid Batteries											
18	HHW											
19	Other Wastes											
20	**Total Tons**			**60.2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	

I Certify that the information provided is true and accurate.

RANDY VIGIL (Affiliate) Digitally signed by RANDY VIGIL (Affiliate) Date: 2020.02.10 10:25:02 -07'00'

Randy E. Vigil, Operations Manager Date

2019 Additional Comments

Name of Facility:	SWWS Compost Facility - Los Alamos National Laboratory
Name of Person completing form:	Randy E. Vigil

Names of Certified Operators at Facility

James G. Marquez - Operator ID #147	
John D. Naranjo - Operator ID #2491	Louis O. Romero - Operator ID #4444
Isaiah A. Medina - Operator ID #4196	Jeremy Martinez - Operator ID #4200
Andrew Maestas - Operator ID #4246	Levi J. Salazar - Operator ID #4382

Average Landfill Tipping Fees		**Average Transfer Station Tipping Fees**	
MSW:	**Not Applicable**	**MSW:**	**Not Applicable**
Tires	**Not Applicable**	**Tires:**	**Not Applicable**
Special Waste			

To Be Completed by Facilities Accepting and Storing Tires: Not Applicable

Number of tires stored on site at the **beginning** of the calendar year (January 1, 2017)		Number of tires stored onsite at the **end** of the calendar year (December 31, 2017)	
Passenger Tires:		Passenger Tires:	
Truck Tires		Truck Tires	
Tire Bales		Tire Bales	

Financial Assurance not enclosed because: (if applicable)

Not required to file financial assurance - SWWS Compost Facility accepts less than 25 tons per day of compostable material

General Comments:

Landfill Information Only:

Gas Monitoring Results not enclosed because:
Not Applicable

Ground Water Monitoring Results not enclosed because:
Not Applicable

Leachate Generation Report not enclosed because:
Not Applicable

Capacity Information not provided because:
Not Applicable

Los Alamos
NATIONAL LABORATORY

Environmental Protection & Compliance Division
Compliance Programs Group

Los Alamos National Laboratory
PO Box 1663, K490
Los Alamos, NM 87545
505-667-0666

Symbol: EPC-DO: 21-043
LAUR: 21-20884
Locates: N/A
Date: FEB 0 2 2021

Ms. Joan M. Snider
Bureau Chief
New Mexico Environment Department
Solid Waste Bureau,
1190 St. Francis Drive, Room S2150
PO Box 5469
Santa Fe, New Mexico 87502

Subject: 2020 Annual Report to NMED Solid Waste Bureau - Sanitary Waste Water System (SWWS) Compost Facility – Registration No. 0215151C

Dear Ms. Snider:

The purpose of this letter and attachments is to fulfill the requirements contained in 20.9.3.27 NMAC for submittal of the 2020 SWWS Compost Facility Solid Waste Annual Report. The contents of this report will also be reported though the New Mexico Environment Department's Solid Waste Bureau (NMED/SWB) online Annual Report database. The information provided in the report is true and accurate. The Compost Facility remains in compliance with New Mexico Solid Waste Regulations - 20.9.3.14 NMAC.

On March 24, 2014, the NMED/SWB approved Los Alamos National Security (LANS), LLC application to operate a compost facility at the Technical Area-46 SWWS Plant (Certificate No. 0215151C). On November 15, 2017, LANS submitted a revised registration application for the SWWS Compost Facility that included a request to change the compost method from a static aerated pile process to an enclosed in-vessel process. NMED approved the facility registration renewal on April 16, 2018. This registration was transferred to Triad National Security, LLC (Triad), effective November 1, 2018.

Compost will be land applied at the Laboratory for landscaping, post construction remediation and other beneficial uses according to the Notice of Intent submitted to NMED on November 12, 2013.

Please contact Robert Gallegos at (505) 665-0450 or at rgallegos@lanl.gov if you have questions.

Sincerely,

TAUNIA VAN VALKENBURG (Affiliate)

Digitally signed by TAUNIA VAN VALKENBURG (Affiliate)
Date: 2021.02.02 14:09:41 -07'00'

Taunia S. Van Valkenburg
Group Leader

Attachment(s): Attachment 1 SWWS Compost Facility - 2020 Solid Waste Annual Report Forms
a. General Information
b. Materials and Solid Water Management
c. Additional Comments

Copy: Genevieve Morgan, NMED/SWB, genevieve.morgan@state.nm.us
Karen E. Armijo, NA-LA, Karen.Armijo@nnsa.doe.gov
Michael W. Hazen, Triad, ALDESHQSS, mhazen@lanl.gov
William R. Mairson, Triad, ALDESHQSS, wrmairson@lanl.gov
Enrique Torres, Triad, EWP, etorres@lanl.gov
Jennifer E. Payne, Triad, EPC-DO, jpayne@lanl.gov
Lawrence V. Chavez, Triad, UI-OPS, lvchavez@lanl.gov
Randy E. Vigil, Triad, UI-OPS, Vigil, revigil@lanl.gov
Michael T. Saladen, Triad, EPC-CP, saladen@lanl.gov
Robert M. Gallegos, Triad, EPC-CP, rgallegos@lanl.gov
Adesh-records@lanl.gov
epccorrespondence@lanl.gov

ATTACHMENT 1

SWWS Compost Facility - 2020 Solid Waste Annual Report Forms

a. General Information

b. Materials and Solid Water Management

c. Additional Comments

EPC-DO: 21-043

LA-UR-21-20884

Date: FEB 0 2 2021

Facility Information January 1-December 31, 2020	Permit or Registration #	Check one	
	0215151C	Closed Facility ☐	Open Facility ☑

County: **Los Alamos**

Facility Name: **Sanitary Waste Water System** Phone# **505.606-2160**

Contact Person: **Randy E. Vigil** Email: **revigil@lanl.gov**

Facility Mailing Address: **P.O. Box 1663 Mail Stop J972**

City: **Los Alamos** State: **NM** ZIP Code **87545**

Physical Location of Facility (City/County Road) **Los Alamos National Laboratory, TA-46**

Facility Operator: **Randy E. Vigil** Phone: **505-606-2160**

Contact Person: **Randy E. Vigil** E-mail Address: **revigil@lanl.gov**

Mailing Address: **P.O. Box 1663 Mail Stop J972**

City: **Los Alamos** State: **NM** ZIP Code **87545**

Facility Owner: **Triad National Security, LLC** Phone: **505-665-1126**

Contact Person: **Andrew W. Erickson** E-mail: erickson@lanl.gov

Mailing Address: **P.O. Box 1663 Mail Stop K760**

City: **Los Alamos** State: **NM** ZIP: **87545**

Landowner: Phone:

Contact Person: E-mail:

Mailing Address:

City: State: ZIP:

Financial Assurance (Check one box)

☐ Updated Financial Assurance Attached

☐ Financial Assurance required but not attached (Explain on Comment Sheet).

☐ Financial Assurance not required. (Explain on Comment Sheet)

Questions? Call 505-827-0197

Landfills Only

☐ Open Landfill ☐ Closed Landfill

Capacity Information for Open Landfills (if not provided explain on Comment Sheet)

Provide Landfill Capacity USED during 2017 _____ (Cubic Yards)

Provide Remaining Landfill Capacity _____ (Cubic Yards)

Provide Remaining Landfill Life _____ (Years) See Capacity Work Sheet

Number of acres at current site, not permitted, that could be used for disposal in the future. _____

Were there any changes in operations that reduced the active life of the landfill by 25% or more?

☐ NO ☐ YES (Attach Notification)

Monitoring Results for Open Landfills (and Closed Landfill in Post-Closure Care).

☐ NO ☐ YES Summary of Landfill Gas Monitoring Results Enclosed (if no, explain on Comment Sheet)

☐ NO ☐ YES Summary of Landfill Groundwater Monitoring Results Enclosed (if no, explain on Comment Sheet)

☐ NO ☐ YES Summary of Leachate Generated & Treated or Disposed Enclosed (if no, explain on Comments Sheet)

Closure and Post-Closure Activity

Date of Closure: _____

Total Acreage used for disposal as of 12/31/2017 _____ (Acres)

Intermediate Cover: N**A** (Acres) Area Seeded: _____ (Acres)

Total Acreage with Final Cover Installed (per Closure Plan) _____ (Acres)

II. 2020 Material and Solid Waste Management Form

Facility Name:	SWWS Compost Facility - LANL	**PRINT Name, Title and Telephone # of the person completing form:**	Randy E. Vigil - Operations Manager 505-606-2160
County:	Los Alamos	**Permit or Registration #**	**Facility Type**
		0215151C	Landfill ☐ Recycle ☐ Compost ☑ Transfer Station ☐

	Material Type (See Instructions)	Method Mark One		Waste Origin		Managed On-site			Sent off site to be:			Sent to:
		Weighed ☐	Estimated ☑	Amount of In-State Material Received in Tons (a)	Amount of Out of State Materials Received in Tons (b)	(c) Landfilled or Treated	(d) Recycled Composted or Mulched	e Beneficially Used	(f) Treated Disposed Incenerated	(g) Recycled Mulched Composted	(h) Benefically Used	(i) Provide Facility Name, City and State
1	MSW											
2	C&D											
3	Clean Fill											
Special Wastes												
4	Industrial Waste											
5	Regulated Asbestos											
6	Infectious Waste											
7	Ash											
8	PCS											
9	Offal											
10	Bio-Solids (Treated Sewage Sludge)		X	32			Composted					Finished compost will be beneficially used at at locations within LANL
11	Other Sludges											
12	Other Special Waste											
Other Materials												
13	Brush/Green Waste		X	9.2			Composted					Finished compost will be used at LANL
14	Scrap Tires											
15	Motor Oil											
16	Antifreeze											
17	Lead Acid Batteries											
18	HHW											
19	Other Wastes											
20	**Total Tons**			**41.2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	

I Certify that the information provided is true and accurate.

_____

Randy E. Vigil, Operations Manager

2020 Additional Comments

Name of Facility:	SWWS Compost Facility - Los Alamos National Laboratory
Name of Person completing form:	Randy E. Vigil

Names of Certified Operators at Facility

James G. Marquez - Operator ID #147

John D. Naranjo - Operator ID #2491 | Louis O. Romero - Operator ID #4444

Levi J. Salazar - Operator ID #4382 | Jeremy Martinez - Operator ID #4200

Andrew Maestas - Operator ID #4246

Average Landfill Tipping Fees		Average Transfer Station Tipping Fees	
MSW:	**Not Applicable**	**MSW:**	**Not Applicable**
Tires	**Not Applicable**	**Tires:**	**Not Applicable**
Special Waste			

To Be Completed by Facilities Accepting and Storing Tires: Not Applicable

Number of tires stored on site at the **beginning** of the calendar year (January 1, 2017)		Number of tires stored onsite at the **end** of the calendar year (December 31, 2017)	
Passenger Tires:		Passenger Tires:	
Truck Tires		Truck Tires	
Tire Bales		Tire Bales	

Financial Assurance not enclosed because: (if applicable)

Not required to file financial assurance - SWWS Compost Facility accepts less than 25 tons per day of compostable material

General Comments:

Landfill Information Only:

Gas Monitoring Results not enclosed because:

Not Applicable

Ground Water Monitoring Results not enclosed because:

Not Applicable

Leachate Generation Report not enclosed because:

Not Applicable

Capacity Information not provided because:

Not Applicable

ATTACHMENT C.2

Land Application Photographs – December 14, 2018

EPC-DO-22-079

LA-UR-22-22068

Unclassified

Date: March 25, 2022


12/14/2018


12/14/2018


OPERATIONS
LABORATORY MAINTENANCE
BUILDING
46-313
12/14/2018


12/14/2018

ATTACHMENT C.3

Waste Disposal Record for SWWS Sludge April 10, 2019

EPC-DO-22-079

LA-UR-22-22068

Unclassified

Date: March 25, 2022

WASTE DATA FORM
W848374

W848374

Current Location						
Company	**Facility**	**Unit**	**Grid X**	**Grid Y**	**Grid Z**	**Grid P**
CLEANH-CO	OPER	RECV				

Shipping Task History					
Ship Date	**Task Id**	**From**	**To**	**Manifest Id**	**Status**
04/10/2019	1881773	LANL, Technical Area 46	CLEANH-CO, General Operations, RECEIVING	107551	Executed

CON-NMSW, NO VERIFICATION REQUIRED

Labeled ID: W848374 **WS ID:** 46165

Waste Type: SLUDGE FROM DRYING BEDS LOCATED @ TA 46-333

Waste Type: New Mexico Special Waste+SLUDGE, EXCEPT COMPOST WHICH MEETS THE PROVISIONS OF 40 CFR 503

Container Type: CM:Roll-off bin - 20 CY

Gross Weight: 20167.0 lb

Tare Weight: 4167.0 lb

Net Weight: 16000.0 lb

Accum Start Date: 01/22/2019

Container Volume: 20.0 CY

STP Code:

STP Version:

Physical State: SOLID

STP Vol (m3):

ERG #:

Generator: RANDY VIGIL (210082), 5056062160

W848374

WMC: RONNIE GARCIA (121998), 5056672210

Shipping Description: NON-REGULATED WASTE, SOLID, (SLUDGE) NEW MEXICO SPECIAL WASTE

Comments: They do not want the roll-off back.

Legend

Rad Worksheet

MDA	Quantity reported is the Minimum Detection Assay result
ACT	Radionuclide is activation product

Rad Summary

ALC	Activity Limit for Exempt Consignment
ACM	Activity Concentration for Exempt Material

Container Types

BA	Burlap, cloth, paper, or plastic bags
BP	Plastic bottle or container (WCATS Specific)
CF	Fiber or plastic boxes, cartons, cases
CM	Metal boxes, cartons, cases (including roll-offs)
CW	Wooden boxes, cartons, cases
CY	Cylinders
DF	Fiberboard or plastic drums, barrels, kegs
DM	Metal drums, barrels, kegs
DT	Dump truck
DW	Wooden drums, barrels, kegs
GP	Glass bottle or container (WCATS Specific)
HU	Holdup, in process accumulation (WCATS Specific)
NA	No containerization
OT	Other (WCATS Specific)
SC	Shield cask
TC	Tank cars
TP	Tanks portable
TS	Tank system (WCATS Specific)
TT	Cargo tanks (tank trucks)