



DEPARTMENT OF ENERGY
National Nuclear Security Administration
Los Alamos Site Office
Los Alamos, New Mexico 87544



CERTIFIED MAIL-RETURN RECEIPT REQUESTED

SEP 04 2012

Mr. John E. Kieling, Chief
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Dear Mr. Kieling:

Subject: Request to Withdraw and Resubmit a Class 1 Permit Modification Request to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, EPA ID No. NM0890010515

This letter and attached enclosure serve as a request to withdraw and resubmit a Class 1 permit modification requiring prior approval to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit. The original permit modification request was submitted by the U.S. Department of Energy (DOE) and the Los Alamos National Security, LLC (LANS) (collectively the Permittees) to the New Mexico Environment Department- Hazardous Waste Bureau (NMED-HWB) on June 13, 2012. The permit modification request included the addition of a structure to the permitted unit at Technical Area (TA) 55 Outdoor Storage Pad. The Permittees hereby request that the Class 1 permit modification request requiring prior approval submitted on June 13, 2012 be withdrawn. The Class 1 permit modification notification transmitted concurrently with that request remains unchanged.

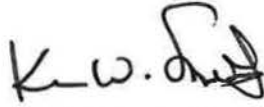
The enclosed permit modification request clarifies and revises the original modification to address the concerns of NMED-HWB staff during a phone conversation on June 28, 2012. The permit modification adds a structure within the boundary of the permitted unit at the Technical Area (TA) 55 Outdoor Container Storage Pad. Permit Section 3.1(3) requires prior approval as a Class 1 permit modification of figures in Attachment N and the closure plans in Attachment G. The structure (55-0190) is located within the boundary of the TA-55 Outdoor Storage Pad.

Text descriptions of the structure in Attachment A, *TA – Unit Descriptions*; Attachment G.26, *Technical Area 55 Outdoor Storage Pad Closure Plan*; and Attachment J, *Hazardous Waste Management Units* have been revised to add the structure. Figures within Attachment N, *Figures* and Attachment G.26 have also been revised to include the structure. Changes to text, the figures, and a description of those changes have been included within Enclosure 1.

This proposed modification was prepared in accordance with New Mexico Administrative Code, Title 20, Chapter 4, Part 1, Section 900 (20.4.1.900 NMAC), incorporating Code of Federal Regulations, Title 40, Part 270, Section 42(d)(2)(i) (40 CFR § 270.42(d)(2)(i)). This submittal includes this letter, an enclosure that contains the permit modification request and revised text and figures, and a signed certification page (collectively LA-UR-12-23640). Three hard copies and one electronic copy of this submittal will be delivered to the NMED-HWB. Upon approval of the permit modification, a notification of the modification will be sent to the NMED-HWB-

maintained LANL facility mailing list in accordance with 20.4.1.900 NMAC (incorporating 40 § CFR 270.42(a)(1)(ii)).

If you have comments or questions regarding this permit modification, contact Gene Turner of my staff at (505) 667-5794 or Mark Haagenstad, LANS, at (505) 665-2014.

A handwritten signature in black ink, appearing to read "K.W. Smith". The signature is stylized with a large, looped "S" at the end.

Kevin W. Smith
Manager

Enclosure:

- (1) Class 1 Permit Modification Request Addition of a Structure within Technical Area 55, Outdoor Storage Pad Los Alamos National Laboratory Hazardous Waste Facility Permit, August 2012

cc w/enclosure:

Laurie King, Chief (6PD-N)
New Mexico/Federal Facilities Section
Environmental Protection Agency
Region 6 1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

cc w/out enclosure:

Tim Hall
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

P. Maggiore, EPO, LASO
G. Turner, EPO, LASO
C. Beard, PADOPS, LANS, MS-A102
M. Brandt, ADESH, LANS, MS-K491
R. Mason, TA55-DO, LANS, MS-E583
P. Carson, NPI-7, LANS, MS-E501
M. Haagenstad, ENV-RCRA, LANS, MS-K404
J. Carmichael, ENV-RCRA, LANS, MS-E501
Records Center
Official Contract File, LASO

EPO-32GT-367-460058

ENCLOSURE 1

**Class 1 Permit Modification Request Addition of a Structure within Technical Area
55, Outdoor Storage Pad**

**Los Alamos National Laboratory Hazardous Waste Facility Permit
August 2012**

LA-UR-12-23640

Date: SEP 04 2012

Class 1 Permit Modification Request Addition of a Structure to Technical Area 55, Outdoor Storage Pad

This document contains request for a Class 1 permit modification to modify the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit). The U.S. Department of Energy and the Los Alamos National Security, LLC (collectively the Permittees) request approval of a Class 1 permit modification request from the New Mexico Environment Department- Hazardous Waste Bureau (NMED-HWB). The text modifications and figure changes to the Permit provided herein are necessary to incorporate the addition of a structure at the Technical Area 55 (TA-55) Outdoor Storage Pad. The additions to the text of the Permit have been identified using red text and a single underline.

Description and Basis

The modification adds a structure to the permitted unit at the TA-55 Outdoor Storage Pad. Permit Section 3.1(3) requires that changes to the location of a structure within which hazardous waste is managed shall be changed within the Permit as a Class 1 modification with prior approval in accordance with Code of Federal Regulations, Title 40 (40 CFR), §270.42(a)(2). The structure (55-0190) is located in the boundary of the unit and will be used for waste management activities.

Discussion

Descriptions of the structures have been added to Section A.5.6 of Attachment A, *TA – Unit Descriptions*; Sections 2.0 and 5.2.2 of Attachment G.26, *Technical Area 55 Outdoor Storage Pad Closure Plan*; and Table J-1 of Attachment J, *Hazardous Waste Management Units*. Revised figures are Figures 10, 39, and 45 of Attachment N, *Figures*; and Figure G.26-1 of Attachment G.26, *Technical Area 55 Outdoor Storage Pad Closure Plan*.

Because the structure will be used for waste management activities, an additional sampling location within the loading area for the structure was added to Figure G.26-1 of Attachment G.26, *Technical Area 55 Outdoor Storage Pad Closure Plan*.

REVISED TEXT

Attachment A, Technical Area (TA) – Unit Descriptions

A.5.6 Container Storage Pad

The Container Storage Pad is used to store containers of hazardous and mixed waste that may contain liquids. The pad is located outside and south southwest of TA-55-4, as shown on Figure 45 in Attachment N (*Figures*). It was installed in the mid-1980s and is constructed of asphaltic-concrete with a variable thickness of 4 to 6 inches (in.). The Container Storage Pad permitted unit is shaped like a trapezoid and measures 102 ft, 86 ft, 156 ft, and 105 ft. The pad is sloped, is elevated 2 to 4 in. above ground level, and has a culvert beneath the pad running from the northwest side to the southeast corner to minimize run-on of precipitation. The storage capacity of this area is 135,000 gal, the equivalent of approximately 2,455 55-gal drums. The types of waste containers holding hazardous or mixed waste that will be stored on the container storage pad include: 0.25-, 0.5-, 0.75-, 1-, 2-, 4-, and 6-liter/quart containers; 30-, 55-, and 85-gal drums; SWBs; large waste boxes; and 5-, 10-, 12-, and 15-gal containers.

Waste containment storage building TA-55-PF-190 is located on the south-eastern portion of the Container Storage Pad and is used for storage of hazardous waste. It measures approximately 22 feet long and 8 feet 4 inches wide (see Figure 45 in Attachment N (*Figures*)). The building is a manufactured steel building that is designed for hazardous waste storage.

Attachment G.26, Technical Area 55, Outdoor Storage Pad Closure Plan

2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The permitted unit is located northwest of TA-55-4 and is constructed of asphalt with a variable thickness of four to six inches (in.). It also has a steel building (TA-55-PF-190) situated on it. The permitted unit is trapezoid-shaped pad with dimensions of 102 feet (ft.), 86 ft., 156 ft., and 105 ft., respectively, on its four sides. The permitted unit is sloped, elevated approximately two to four in. above ground level, and has a culvert beneath the pad running from the northwest side to the southeast side to minimize run-on of precipitation.

Waste containment storage building TA-55-PF-190 is located on the south-eastern portion of the permitted unit and is used for storage of hazardous waste. It measures approximately 22 feet long and 8 feet 4 inches wide. The building is a manufactured steel building that is designed for hazardous waste storage.

5.2.2 Structural Assessment

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspection of the floors, walls, and ceiling of the steel building, as well as inspecting the asphalt pad for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and

analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

Attachment J, Hazardous Waste Management Units

TABLE J-1

Active Portion of the Facility

Includes units permitted to store and treat hazardous waste, interim status units, and the Material Disposal Areas.

Process codes and associated process descriptions:

S01-storage in containers

S02-storage in tanks

S99-other storage

D80-landfill

T04 – treatment in tanks

X01*-open burning

X01**-open detonation

Unit Identifier	Process Codes	Operating Capacity	General Information	Type of Unit
TA-55-4 Outdoor Pad	S01	135,000 gal	Located outside and west of TA-54-4 <u>Includes building PF-190</u> Total square footage – 11,100	Outdoor (not associated with a regulated unit)

REVISED FIGURES

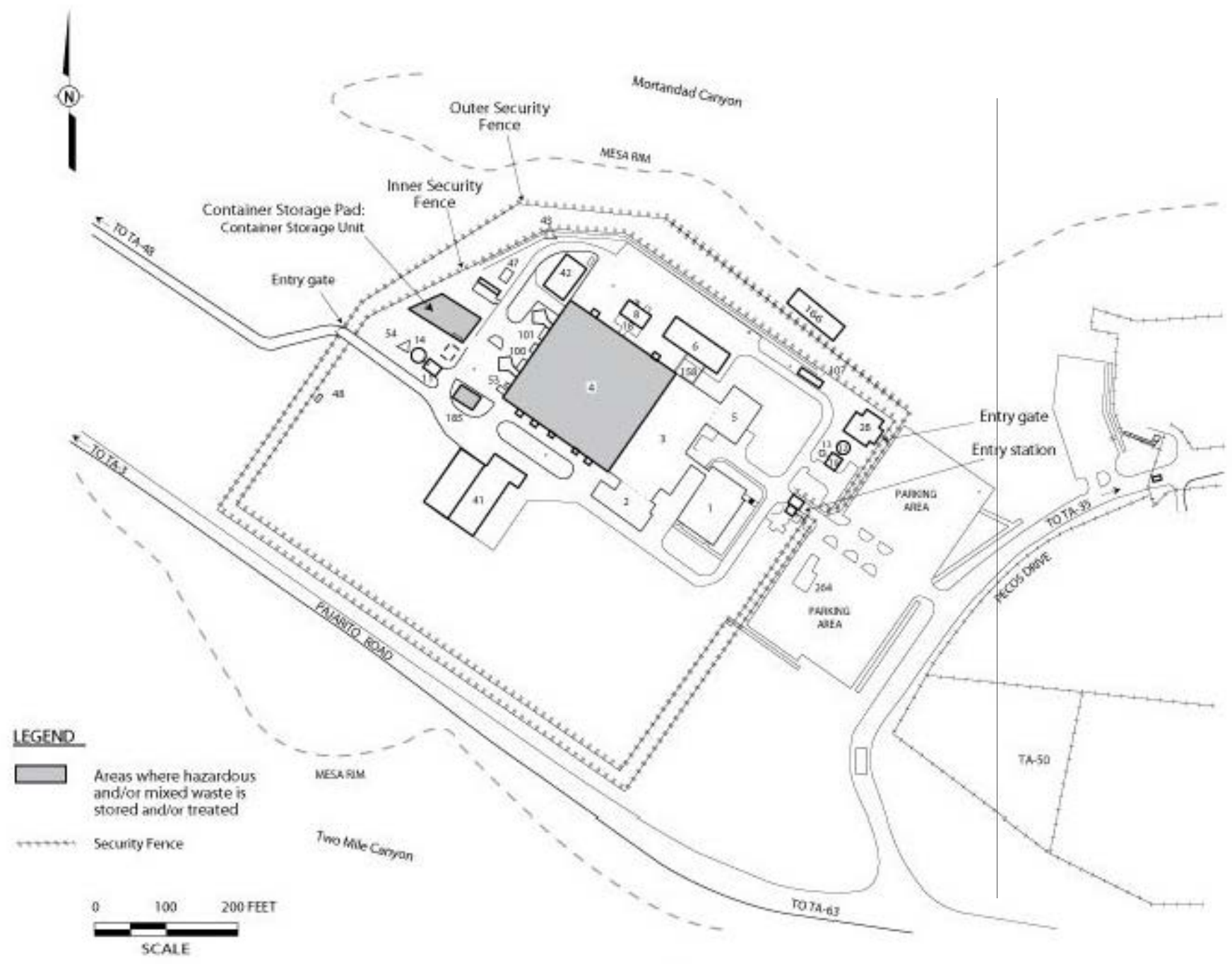


Figure 10
Technical Area (TA) 55 Location Map Showing Security Fences, Entry Gates, and Entry Stations

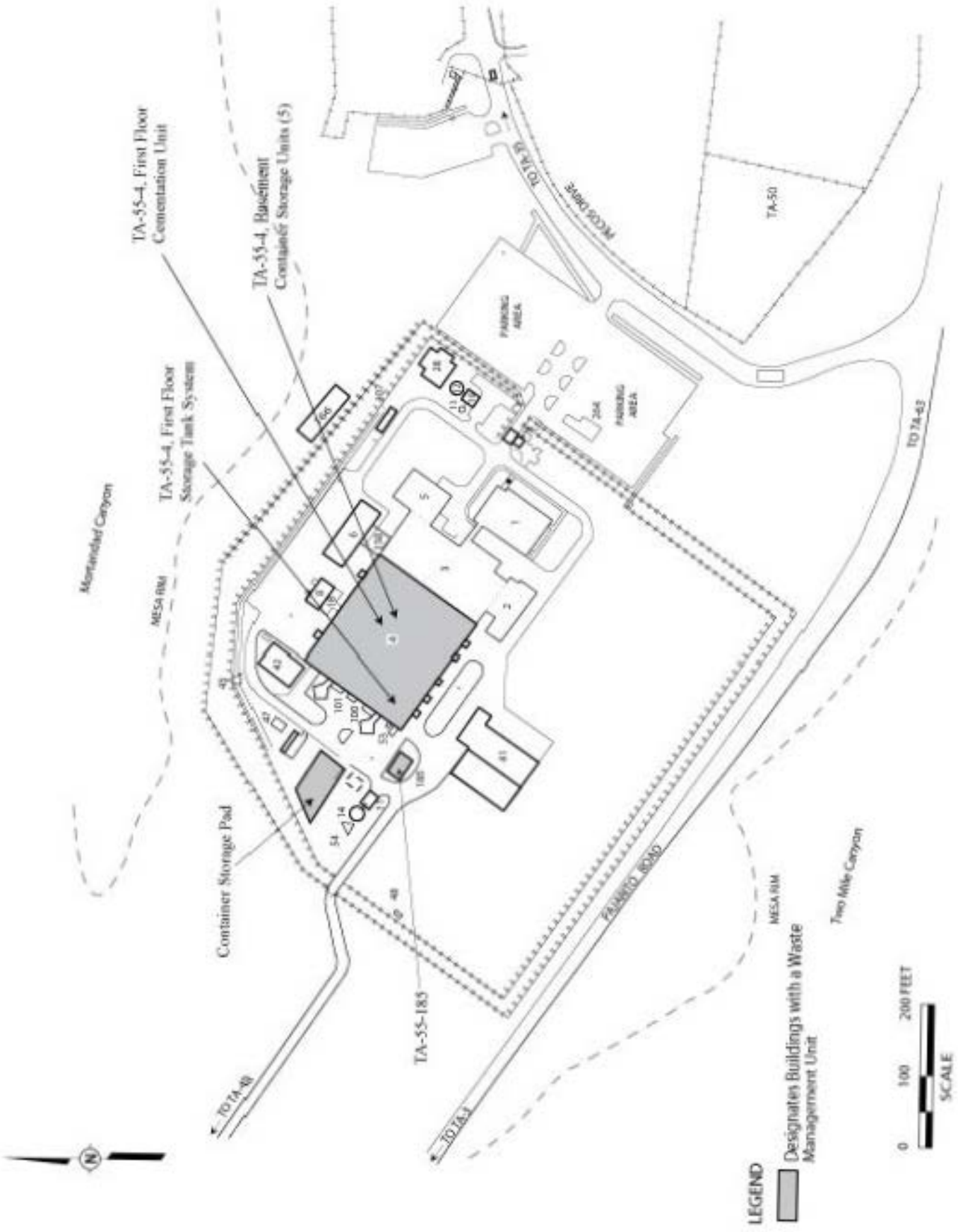
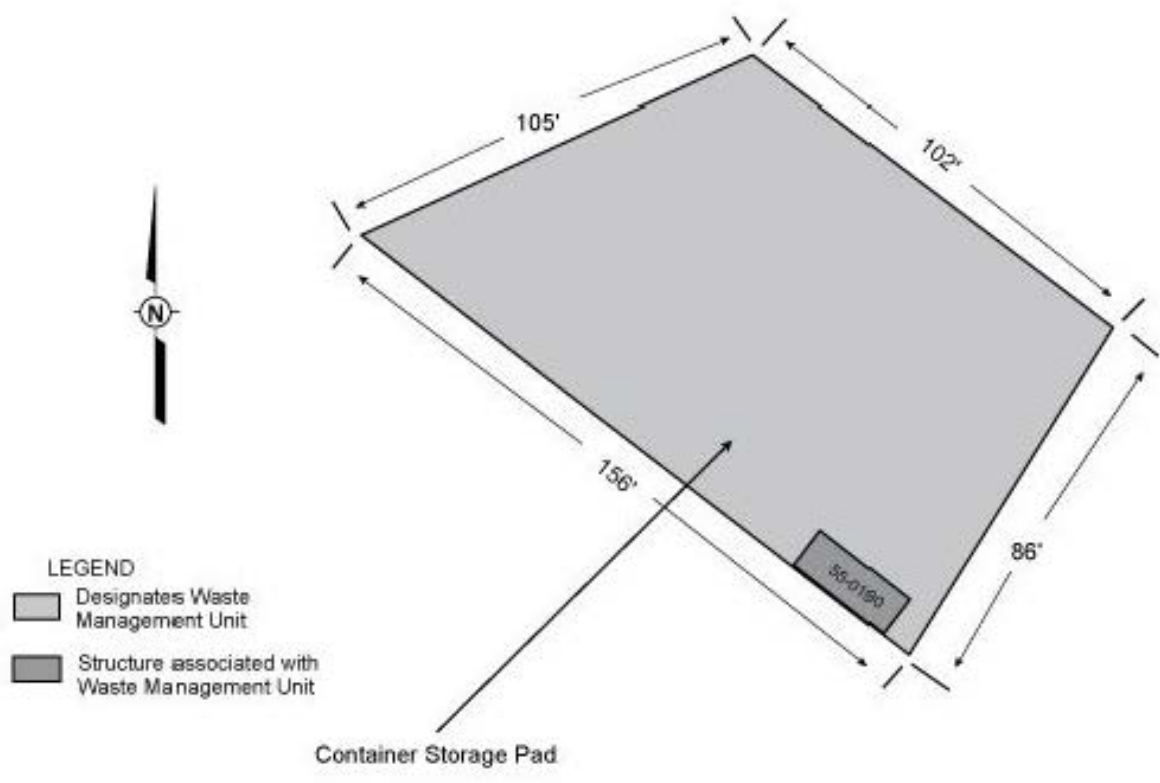


Figure 39
 Technical Area (TA) 55, Building 4 Location Map



Note: TA-55-4 is located approximately 140 feet east of this container storage pad. Refer to Figure 39 for the general location of this container storage pad in relation to other buildings/structures at TA-55.

NOT TO SCALE

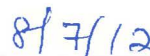
Figure 45
 Technical Area (TA)-55, Building 4, Outdoor Container Storage Pad

Document: LANL TA-55 Class 1 Permit Modification

Date: August 2012

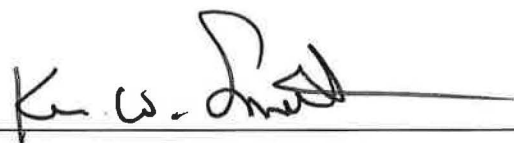
CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Alison M. Dorries
Division Leader
Environmental Protection Division
Los Alamos National Laboratory
Operator

Date Signed



Kevin W. Smith
Manager
Los Alamos Site Office
National Nuclear Security Administration
U.S. Department of Energy
Owner/Operator

Date Signed



DEPARTMENT OF ENERGY
National Nuclear Security Administration
Los Alamos Site Office
Los Alamos, New Mexico 87544



CERTIFIED MAIL-RETURN RECEIPT REQUESTED

SEP 04 2012

Mr. John E. Kieling, Chief
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

COPY

Dear Mr. Kieling:

Subject: Request to Withdraw and Resubmit a Class 1 Permit Modification Request to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, EPA ID No. NM0890010515

This letter and attached enclosure serve as a request to withdraw and resubmit a Class 1 permit modification requiring prior approval to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit. The original permit modification request was submitted by the U.S. Department of Energy (DOE) and the Los Alamos National Security, LLC (LANS) (collectively the Permittees) to the New Mexico Environment Department- Hazardous Waste Bureau (NMED-HWB) on June 13, 2012. The permit modification request included the addition of a structure to the permitted unit at Technical Area (TA) 55 Outdoor Storage Pad. The Permittees hereby request that the Class 1 permit modification request requiring prior approval submitted on June 13, 2012 be withdrawn. The Class 1 permit modification notification transmitted concurrently with that request remains unchanged.

The enclosed permit modification request clarifies and revises the original modification to address the concerns of NMED-HWB staff during a phone conversation on June 28, 2012. The permit modification adds a structure within the boundary of the permitted unit at the Technical Area (TA) 55 Outdoor Container Storage Pad. Permit Section 3.1(3) requires prior approval as a Class 1 permit modification of figures in Attachment N and the closure plans in Attachment G. The structure (55-0190) is located within the boundary of the TA-55 Outdoor Storage Pad.

Text descriptions of the structure in Attachment A, *TA – Unit Descriptions*; Attachment G.26, *Technical Area 55 Outdoor Storage Pad Closure Plan*; and Attachment J, *Hazardous Waste Management Units* have been revised to add the structure. Figures within Attachment N, *Figures* and Attachment G.26 have also been revised to include the structure. Changes to text, the figures, and a description of those changes have been included within Enclosure 1.

This proposed modification was prepared in accordance with New Mexico Administrative Code, Title 20, Chapter 4, Part 1, Section 900 (20.4.1.900 NMAC), incorporating Code of Federal Regulations, Title 40, Part 270, Section 42(d)(2)(i) (40 CFR § 270.42(d)(2)(i)). This submittal includes this letter, an enclosure that contains the permit modification request and revised text and figures, and a signed certification page (collectively LA-UR-12-23640). Three hard copies and one electronic copy of this submittal will be delivered to the NMED-HWB. Upon approval of the permit modification, a notification of the modification will be sent to the NMED-HWB-