



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



John Kieling, Manager
RCRA Permits Management Program
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

JUN 13 2012

Dear Mr. Kieling:

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

The purpose of this letter is to request approval by the New Mexico Environment Department - Hazardous Waste Bureau (NMED-HWB) of a Class 1 Permit Modification and to provide Notice of a Class 1 Permit Modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit issued to the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) in November 2010.

Enclosed are the following Class 1 Permit Modifications:


- **Class 1 Permit Modification Notification:** Correct a non-substantive typographical error in Attachment G.26, Section 3 (closure plan). Section 3.0 contains an incorrect header with the word "Treated," and should be "Stored" to correctly reflect the nature of the unit. No treatment will occur at this unit, only storage (see Enclosure 1).
- **Class 1 Permit Modification With Prior Approval:** Revise figures in Attachment N (figures 10, 39, and 45) and Attachment G.26; add descriptions of the structure to Section A.5.6 in Attachment A, *TA – Unit Descriptions*; Sections 2.0 & 5.2.2 in Attachment G.26, *Technical Area 55 Outdoor Storage Pad Closure Plan*; and Table J-1 in Attachment J, *Hazardous Waste Management Units* (see Enclosure 2) (discussed below).

The first permit modification listed above is a correction of a typographical error as listed in Appendix I to the New Mexico Administrative Code (NMAC), 20.4.1.900 NMAC (incorporating 40 CFR § 270.42). The second proposed 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) added within the boundary of the permitted unit at TA-55 will not currently be used for storage of hazardous waste at the permitted unit. Instead, it will be used for generator storage as part of a less than 90 day accumulation area that is currently located within the boundary of the unit. Depictions and descriptions of the structure and

its capability, where applicable, have been added to the Permit with editing marks in redline-strikeout or as revised figures (see Enclosure 2).

This proposed modification has been prepared in accordance with 20.4.1.900 NMAC (incorporating 40 CFR § 270.42(d)(2)(i)). This package includes this letter and two enclosures each containing a redline-strike out copy of the pages of the Permit that contain revised text, and the revised figures (collectively LA-UR-12-20765). Accordingly, a signed certification page is also enclosed. Three hard copies and one electronic copy of this submittal will be delivered to the NMED-HWB.

Upon approval of this Class 1 permit modification, the modification will be put into effect and a notice will be sent to the NMED-HWB-maintained LANL facility mailing list in accordance with the conditions specified in 20.4.1.900 NMAC (incorporating 40 CFR §§ 270.42(a)(1)(i) and (ii)). If you have comments or questions regarding this permit modification, please contact Gene Turner of my staff at (505) 667-5794 or Mark Haagenstad, LANS, at (505) 665-2014.



Kevin W. Smith
Manager

Enclosures

cc w/enclosure:

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J. Carmichael, ENV-RCRA, LANS, MS-E501
Records Center, LASO
Official Contract File, LASO

EPO-32GT-335-442668

Document: LANL TA-55 Class 1 Permit Modification
Date: April 2012

Enclosure 1

Notice of Class 1 Permit Modification, Proposed Redline-Strikeout Revisions to
LANL Hazardous Waste Facility Permit

LA-UR-12-20765
JUN 13 2012

Date

ATTACHMENT G.26
TECHNICAL AREA 55
OUTDOOR STORAGE PAD
CLOSURE PLAN

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3.0 ESTIMATE OF MAXIMUM WASTE ~~STORED~~TREATED

Approximately 930 cubic meters of waste has been stored in the permitted unit. Throughout the life of this Permit it is estimated that an additional 700 cubic meters of waste will be stored in the permitted unit.

4.0 GENERAL CLOSURE INFORMATION

4.1 Closure Performance Standard

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of 10^{-5} for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (Closure) and 40 CFR Part 264 Subparts G and I for container storage units.

Closure of the unit will be deemed complete when: 1) all structures and related equipment have been decontaminated or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

4.2 Closure Schedule

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.26-1 of this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR §264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be

Document: LANL TA-55 Class 1 Permit Modification
Date: April 2012

Enclosure 2

**Class 1 Permit Modification Requiring Prior Approval, Proposed Redline-Strikeout
Revisions to LANL Hazardous Waste Facility Permit**

LA-UR-12-20765

JUN 13 2012

Date

ATTACHMENT A
TECHNICAL AREA (TA) - UNIT DESCRIPTIONS

Figure 42 in Attachment N (*Figures*). The permitted unit is rectangular shaped and is 26 ft long by 10 ft wide. The maximum storage capacity of this unit is 3,600 gal, the equivalent of 66 55-gal drums. The types of waste containers holding hazardous or mixed waste that will be stored in B05 include 30-, 55-, and 85-gal drums, large waste boxes; and SWBs.

A.5.3 K13

The K13 permitted unit is used to store containers of hazardous and mixed waste that may contain liquids. K13 is located in the northwest section of the TA-55-4 basement, as shown on Figure 41 in Attachment N (*Figures*). The permitted unit is rectangular shaped and is 12 ft long by 13 ft wide. The maximum storage capacity of this unit is 2,500 gal, the equivalent of 46 55-gal drums. The types of waste containers holding hazardous or mixed waste that will be stored in K13 include: 0.25-, 0.5-, 0.75-, 1-, 2-, 4-, and 6-liter/quart containers; 5-, 10-, 12-, and 15-gal containers; 30-, 55-, and 85-gal drums; and large waste boxes.

A.5.4 B45

The B45 permitted unit is used to store containers of hazardous and mixed waste that do not contain liquids. B45 is located in the northeast section of the TA-55-4 basement, as shown on Figure 43 in Attachment N (*Figures*). The permitted unit is rectangular shaped and is 45 ft long by 17.5 ft wide. The maximum storage capacity of this unit is 11,000 gal, the equivalent of 200 55-gal drums. The types of waste containers holding hazardous or mixed waste that will be stored in B45 include: 5-, 10-, 12-, and 15-gal containers; 55- and 85-gal drums; large waste boxes; and SWBs.

A.5.5 Vault

The Vault permitted unit is used to store containers of mixed waste that may contain liquids. The Vault is located along the eastern wall of the basement at TA-55-4, as shown on Figure 42 in Attachment N (*Figures*) and is approximately 79.5 ft long by 50.5 ft wide. The maximum storage capacity of this unit is 4,000 gal, the equivalent of approximately 73 55-gal drums. The types of waste containers holding mixed waste that will be stored in the Vault include: 0.25-, 0.5-, 0.75-, 1-, 2-, 4-, and 6-liter/quart containers; and 5-, 10-, 12-, 15-, 30- and 55-gal drums.

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 generator 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 material storage.

A.5.7 TA-55-185

TA-55-185 is used to store containers of hazardous and mixed waste that do not contain liquids. TA-55-185 is located west of TA-55-4, as shown on Figure 46 in Attachment N (Figures). The building was constructed in 1991 and consists of a steel frame with fiberglass insulation, metal walls, and a concrete floor. The TA-55-185 permitted unit will be approximately 60 ft long by 40 ft wide, and will have a maximum storage capacity of 30,000 gal, the equivalent of 546 55-gal drums. The types of waste containers holding hazardous or mixed waste that will be stored at TA-55-185 include: 30-, 55-, and 85-gal drums; large waste boxes; and SWBs.

A.5.8 Storage Tank System

There is one storage tank unit at TA-55 that is comprised of two tank components, the evaporator glovebox tank and the stabilization unit pencil tanks. The two tank components share a common piping and pumping system.

The evaporator glovebox tank was constructed in 1986. The stabilization unit pencil tanks were constructed in 1985, installed from 1987-88, and were considered existing tanks until new components were installed in 1996. These new components were determined to be a major, non-routine modification; therefore, the stabilization unit pencil tanks are subject to the new tank system regulations and are addressed as new tanks in accordance with the requirements of 40 CFR § 264.192, which is incorporated herein by reference.

The TA-55 storage tank unit is located at TA-55, Building 4, in Room 401 and has a maximum capacity of 560 Liters (L) (137 gallons [gal]). The storage tank system consists of two components, with six tanks, that are used to store evaporator bottoms solutions prior to stabilization.

Liquid waste comes primarily from the evaporator as evaporator bottoms in approximately 25-L batches. Unrecyclable evaporator distillate waste (corrosive only) is also cemented when the low-level acid waste line to the TA-50 Radioactive Liquid Waste Treatment Facility is closed. Liquid waste generated from a source other than the evaporator (such as C-AAC analytical residues) is transferred to the Cementation Unit glovebox in plastic bottles up to 2L in volume via the trolley system.

The evaporator bottoms solutions are initially stored in the evaporator glovebox tank component, where they are sampled for radionuclides, oxides, and metals. They remain in the

ATTACHMENT G.26
TECHNICAL AREA 55
OUTDOOR STORAGE PAD
CLOSURE PLAN

1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at the Technical Area 55 Outdoor Storage Pad at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste container storage at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

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 generator 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 material storage.

The waste typically stored at the permitted unit consists generally of hazardous and mixed waste in both solid and liquid form. The unit was constructed and placed into use in 1979 and has been subject to waste management regulations under RCRA since July 25, 1990. Due to the scope of process operations at TA-55-4, the stored wastes include characteristic and listed waste, corrosive liquids, sludge, debris, and chemical wastes with metals and volatile and semi-volatile organic constituents. Specific Environmental Protection Agency (EPA) Hazardous Waste Numbers managed at the unit are included in Table G.26-1.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include further information about waste management procedures and hazardous waste constituents stored at the permitted unit.

- b. confirm additional sampling locations (*e.g.*, locations of spills or chronic conditions identified in the Operating and Inspection Records).

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.

5.3 Decontamination and Removal of Structures Equipment

In accordance with Permit Section 9.4.3, all remaining hazardous waste and hazardous waste residues will be removed from the permitted unit. The permitted unit's structures and equipment will be decontaminated, removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*) and Facility waste management procedures.

5.3.1 Removal of Structures and Related Equipment

All structures and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan. The entire asphalt pad (including all materials associated with it such as any underlying base course or fill) will be removed after the structural assessment.

5.3.2 Decontamination of Structures and Related Equipment

All structures and equipment that will be reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. At this time there is no equipment that is expected to be reused; however, if equipment or structures are identified during the assessment they will be decontaminated in accordance with this section. Decontamination of structures and equipment will be steam cleaned using water or pressure washed with a solution consisting of a surfactant detergent (*e.g.*, Alconox[®]) and water. Portable berms, other devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess water and provide containment during the decontamination process.

5.3.3 Equipment Used During Decontamination Activities

Reusable protective clothing, tools, and equipment used during decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.26-3 and in accordance with Facility waste management procedures, depending on the regulated constituents present.

6.0 SAMPLING AND ANALYSIS PLAN

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be

Figure G.26-1: Technical Area 55 Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations

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-3-29	S01	18,500 gal	Includes Room 9010 and portions of Room 9020 and 9030 Located in Wing 9 of the basement of Building 29 Total square footage – 3,040	Indoor
TA-14-23	X01*	50 lbs HE/burn	Near Structure TA-14-23 Interim Status Unit	NA
TA-14-23	X01**	20 lbs HE/detonation	Near Structure TA-14-23 Interim Status Unit	NA
TA-16-388	X01*		Flash Pad Total square footage - 484 Interim Status Unit not authorized to treat hazardous waste and undergoing closure	Outdoor (associated with a open burn unit)

Unit Identifier	Process Codes	Operating Capacity	General Information	Type of Unit
TA-16-399	X01*		Burn Tray Total square footage - 64 Interim Status Unit not authorized to treat hazardous waste and undergoing closure	Outdoor (associated with an open burn unit)
TA-36-8	X01**	2000 lbs/ detonation	Near Structure TA-36-8 Interim Status Unit	NA
TA-39-6	X01**	1000 lbs/ detonation	Near Structure TA-39-6 Interim Status Unit	NA
TA-39-57	X01**	1000 lbs/ detonation	Near Structure TA-39-57 Interim Status Unit	NA
TA-50-69 Indoor	S01	1,500 gal	Includes Rooms 102 and 103. Total square footage – 2,680	Indoor
TA-50-69 Outdoor Pad	S01	30,000 gal	Total square footage – 3,240	Outdoor (not associated with a regulated unit)
TA-54 “G”	D80	NA	Material Disposal Area Unit not permitted to receive hazardous waste	Regulated unit
TA-54 Area G Container Storage Unit (below ground)	S99	4,950 gal	Includes shafts 145 and 146 Wastes removed and unit undergoing closure, closure certification incomplete	NA
TA-54 Area G Pad 1	S01	502,920 gal	Includes building TA-54-412 (DVRS) Total square footage – 89,500	Outdoor (associated with a regulated unit)
TA-54 Area G Pad 3	S01	213,840 gal	Includes Storage Dome 48 Total square footage – 19,300	Outdoor (associated with a regulated unit)

Unit Identifier	Process Codes	Operating Capacity	General Information	Type of Unit
TA-54 Area G Pad 5	S01	623,480 gal	Includes Storage Domes 49 and 224; Storage Sheds 144, 145, 146, 177, 1027, 1028, 1030, and 1041 Pad 5 is a consolidation of former Pads 5, 7, and 8. Total square footage – 59,900	Outdoor (associated with a regulated unit)
TA-54 Area G Pad 6	S01	597,300 gal	Includes Storage Domes 153 and 283; Transportainer 491; and Storage Sheds 486, 522, 523, and 492. Total square footage – 68,300	Outdoor (associated with an regulated unit)
TA-54 Area G Pad 9	S01	1,446,720 gal	Includes Storage Domes 229, 230, 231, and 232; and Storage Sheds 57 and 484. Total square footage – 158,000	Outdoor (associated with a regulated unit)
TA-54 Area G Pad 10	S01	159,770 gal	Includes Transuranic (TRU) Waste Characterization Facilities: TA-54-0547 (SuperHENC), TA-54-0497 (RTR2), TA-54-0498 (LANL HENC), TA-54-0506 (MCS HENC), TA-54-0545 and 546 (Storage trailers), TA-54-0365 (Office Building Formerly MTGS), TA-54-0483 (Source Storage Trailer), and TA-54-1059 (Storage Trailer) Pad 10 is a consolidation of former Pads 2 and 4. Total square footage – 120,000	Outdoor (associated with a regulated unit)
TA-54 Area G Pad 11	S01	682,440 gal	Includes Storage Dome 375 and RTR1 Total square footage – 30,000	Outdoor (associated with a regulated unit)

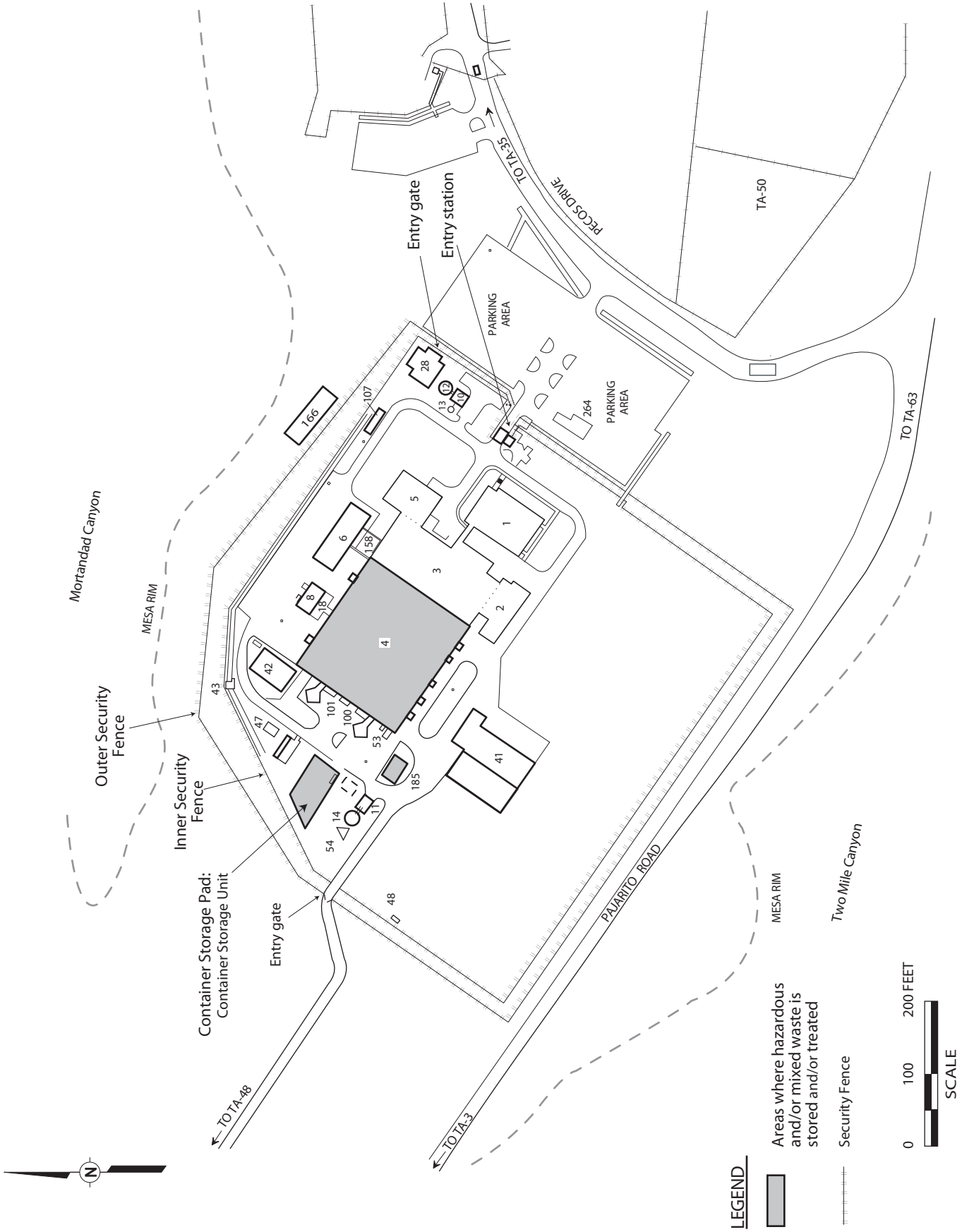
Unit Identifier	Process Codes	Operating Capacity	General Information	Type of Unit
TA-54 Area G Storage Shed 8	S01	11,880 gal	Also referred to as TA-54-8 Total square footage - 698	Indoor
TA-54 Area G TA-54-33	S01	108,240 gal	Also referred to as Drum Prep Facility Total square footage – 5,000	Indoor
TA-54 “H”	D80	NA	Material Disposal Area H Unit not permitted to receive hazardous waste	Regulated unit
TA-54 “L”	D80	NA	Material Disposal Area L Unit not permitted to receive hazardous waste	Regulated unit
TA-54 Area L Container Storage Unit (below ground)	S99	600 gal	Includes shafts 36 and 37 Wastes removed and unit undergoing closure, closure certification incomplete	NA
TA-54 Area L Outdoor Pad	S01	407,880 gal	Includes all area within fence-line except limited administrative areas. Includes Storage Sheds 31, 68, 69, and 70; Storage Pads 32, 35, 36, and 58; and Building 39; Storage Dome 215(former Area 1); and Storage Canopy 216. Total square footage – 28,900	Outdoor (associated with a regulated unit)
TA-54-38 West Indoor	S01	3,740 gal	Includes High Bay and Low Bay Total square footage – 4,060	Indoor
TA-54-38 West Outdoor Pad	S01	7,920 gal	Includes loading dock and Pad surrounding Total square footage – 37,900	Outdoor (not associated with a regulated unit)

Unit Identifier	Process Codes	Operating Capacity	General Information	Type of Unit
TA-55-4, B40	S01	21,500 gal	Located in basement Referred to as Area 1 Total square footage – 3,380	Indoor
TA-55-4, K13	S01	3,400 gal	Located in basement Referred to as Area 4 Total square footage - 208	Indoor
TA-55-4, B05	S01	3,600 gal	Located in basement Referred to as Area 5 Non-liquid wastes only Total square footage - 260	Indoor
TA-55-4, B45	S01	11,000 gal	Located in basement Non-liquid wastes only Total square footage - 788	Indoor
TA-55-4, Vault	S01	4,000 gal	Located in basement Referred to as Area 6 Total square footage – 4,020	Indoor
TA-55-4-401 Mixed Waste Storage Tank Unit	S02	Storage - 137 gal	TA-55-4 Room 401 Unit divided into two components (Evaporator Glovebox Storage Tank System and Cementation Storage Tank System) Total square footage – 4,500	Indoor
TA-55-4-401 Mixed Waste Stabilization Unit	T04	Treatment - 150 gal / day	TA-55-4 Room 401 Total square footage – 4,500	Indoor
TA-55-185	S01	30,000 gal	Located west of TA-54-4 Non-liquid wastes only Total square footage - 2,400	Indoor

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)

ATTACHMENT N

FIGURES



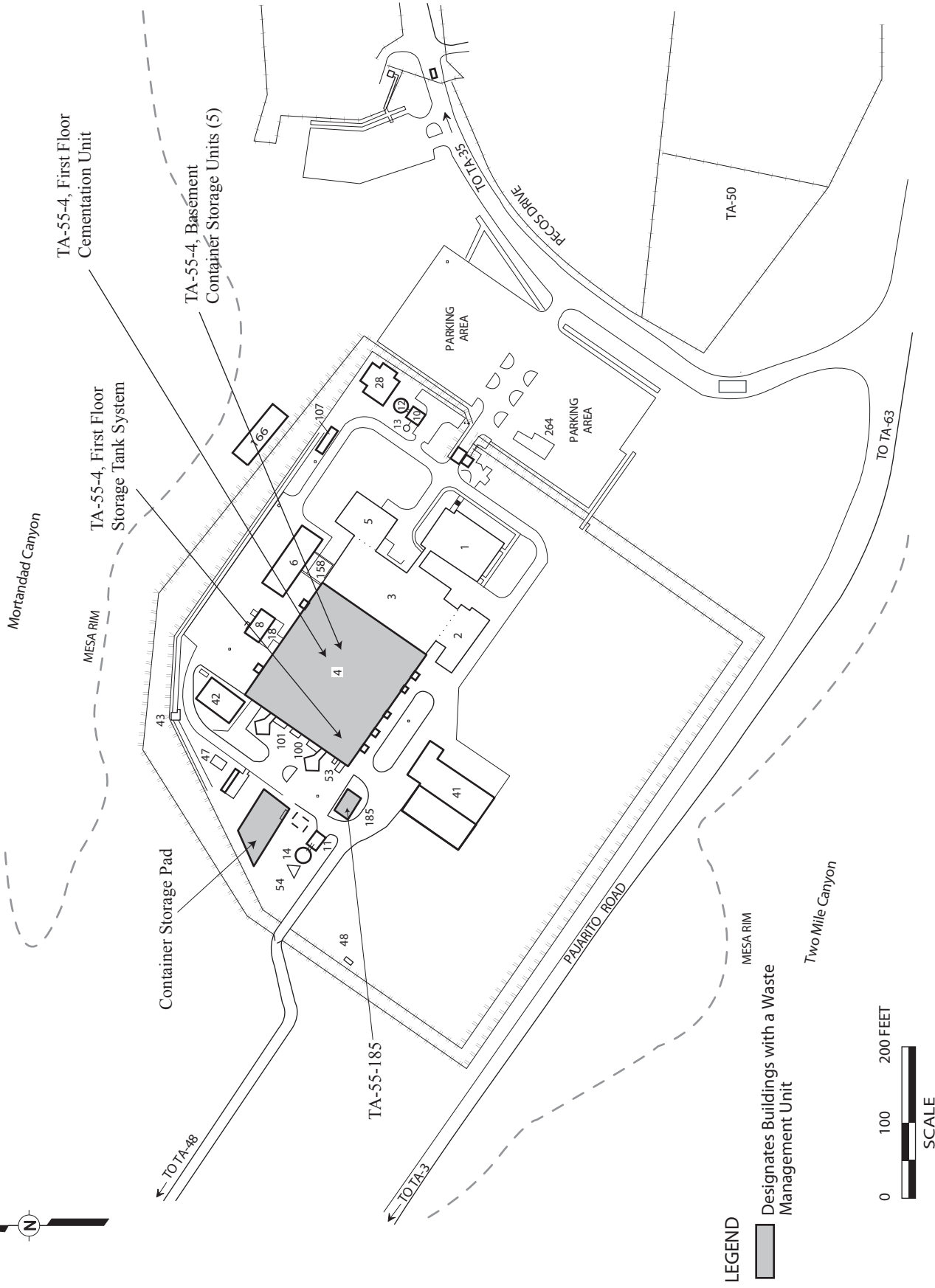
LEGEND

Areas where hazardous and/or mixed waste is stored and/or treated

Security Fence



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



TA-55-4, First Floor
Cementation Unit

TA-55-4, Basement
Container Storage Units (5)

TA-55-4, First Floor
Storage Tank System

Container Storage Pad

TA-55-185

LEGEND

 Designates Buildings with a Waste Management Unit

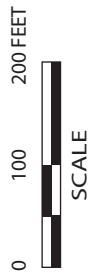
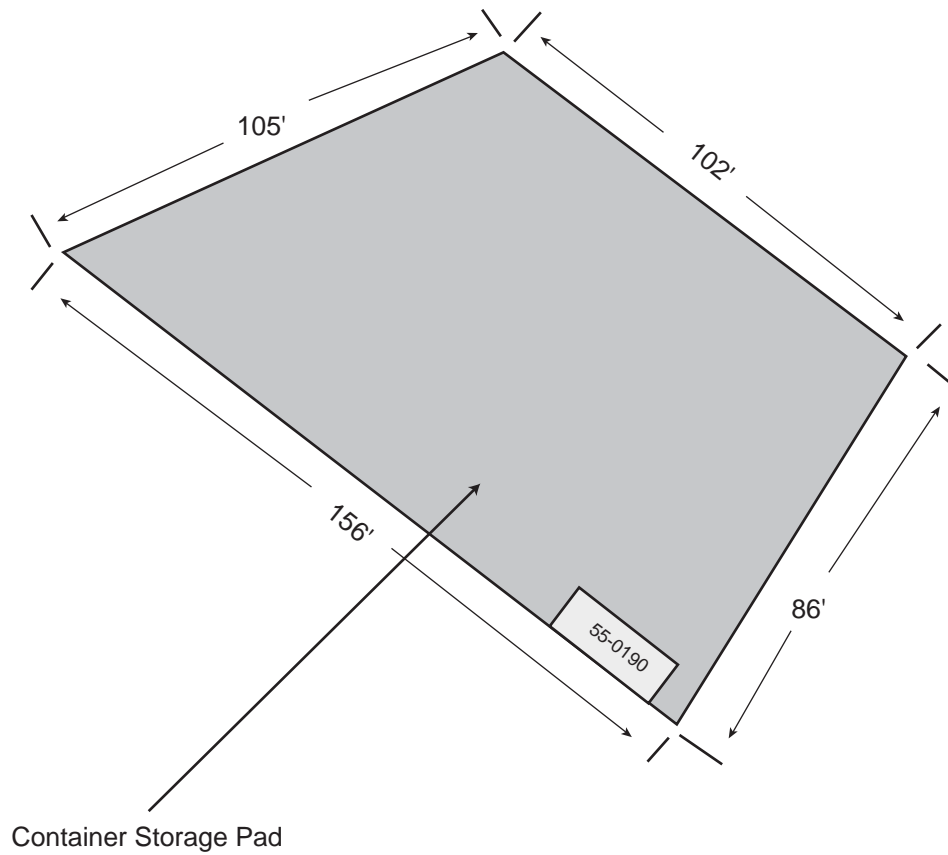


Figure 39
Technical Area (TA) 55, Building 4 Location Map



- LEGEND
- Designates Waste Management Unit
 - Structure



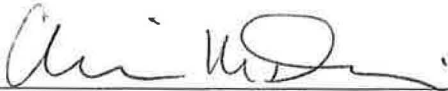
Note: TA-55-4 is located approximately 140 feet east of this container storage pad. Refer to Figure 39 for the general location of this container storage pad in relation to other buildings/structures at TA-55.

NOT TO SCALE

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

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.



5/10/12

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

Date Signed



6/12/12

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



John Kieling, Manager
RCRA Permits Management Program
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

JUN 13 2012



COPY

Dear Mr. Kieling:

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

The purpose of this letter is to request approval by the New Mexico Environment Department - Hazardous Waste Bureau (NMED-HWB) of a Class 1 Permit Modification and to provide Notice of a Class 1 Permit Modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit issued to the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) in November 2010.

Enclosed are the following Class 1 Permit Modifications:

- **Class 1 Permit Modification Notification:** Correct a non-substantive typographical error in Attachment G.26, Section 3 (closure plan). Section 3.0 contains an incorrect header with the word "Treated," and should be "Stored" to correctly reflect the nature of the unit. No treatment will occur at this unit, only storage (see Enclosure 1).
- **Class 1 Permit Modification With Prior Approval:** Revise figures in Attachment N (figures 10, 39, and 45) and Attachment G.26; add descriptions of the structure to Section A.5.6 in Attachment A, *TA – Unit Descriptions*; Sections 2.0 & 5.2.2 in Attachment G.26, *Technical Area 55 Outdoor Storage Pad Closure Plan*; and Table J-1 in Attachment J, *Hazardous Waste Management Units* (see Enclosure 2) (discussed below).

The first permit modification listed above is a correction of a typographical error as listed in Appendix I to the New Mexico Administrative Code (NMAC), 20.4.1.900 NMAC (incorporating 40 CFR § 270.42). The second proposed 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) added within the boundary of the permitted unit at TA-55 will not currently be used for storage of hazardous waste at the permitted unit. Instead, it will be used for generator storage as part of a less than 90 day accumulation area that is currently located within the boundary of the unit. Depictions and descriptions of the structure and