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Symbol: ALDESHQ-26-007
Date: February 25, 2026

Mr. JohnDavid Nance, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
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Subject: Los Alamos National Laboratory's Compliant Completion of Flanged Tritium Waste Container Operations

Dear Mr. Nance:

The U.S. Department of Energy (DOE) National Nuclear Security Administration (NNSA) and Triad National Security, LLC (Triad), collectively the Permittees, completed operations related to four flanged tritium waste containers (FTWCs). The containers required pressure mitigation to protect worker safety, human health, and the environment. The Los Alamos National Laboratory (Laboratory or LANL)[1] addressed the safety risk arising from the radioactive component of the FTWCs, placed the FTWCs in stable and safe configurations, moved the FTWCs from Laboratory Area G to the Laboratory Weapons Engineering and Tritium Facility, ensured that the containers were closed in a certified manner, and shipped the FTWCs offsite for permanent disposal. The FTWC operations were conducted in compliance with all applicable laws, were conducted in conformance with the New Mexico Environment Department's (NMED) Temporary Authorization, were performed safely, and were performed in a manner protective of human health and the environment.

The FTWCs operations followed LANL's Temporary Authorization and satisfied the NMED's "criteria" and "non-negotiable modifications" included in its approval of the Temporary Authorization. Prior to conducting the FTWC operations, DOE and Triad requested NMED's approval for Temporary Authorization to store and repackage the FTWCs at the Weapons Engineering and Tritium Facility following pressure mitigation operations.[2] DOE and Triad

[1] Triad manages and operates the Los Alamos National Laboratory on behalf of the DOE NNSA.
[2] Pressure mitigation operations are governed by the Atomic Energy Act (AEA), 42 U.S.C. § 2011, *et seq*., pursuant to which the Laboratory's FTWC operations complied, and by the U.S. Environmental Protection Agency (EPA), which approved the FTWC operations pursuant to EPA's National Emission Standards for Hazardous Air Pollutants

satisfied the Temporary Authorization requirements specified in 40 C.F.R. § 270.42(e) and demonstrated the operations' compliance with the 40 C.F.R. Part 264 standards, which define the acceptable management of hazardous waste.

NMED found that "Permittees [DOE and Triad] request [for Temporary Authorization was] consistent with the applicable requirements of 40 C.F.R. § 270.42(e)(3)." But NMED determined that it "w[ould] not act" on the Temporary Authorization request until four "criteria" were successfully met.[3] These four criteria were:

1. Independent Technical Review. The Permittees shall obtain an independent, third-party technical review for alternative options for the depressurization of the FTWCs. The independent, third-party technical review report shall be provided to the U.S. Environmental Protection Agency (EPA) Region 6 and the NMED. Such a report shall be a matter of public record and made available to the public on the Permittees website.

An Independent Technical Review was conducted. The independent technical report discussed the various alternatives to conducting the FTWC operations and concluded that depressurization in place at Area G "[p]rovided the safest option to workers, the public, and the environment and poses very low risk of offsite exposure to the public." The independent technical report was provided to EPA and NMED, made available on the Laboratory's website, and made available to the public in advance of the August 20, 2025, Public Meeting. NMED acknowledged receipt of the Review in their September 4, 2025, letter to DOE and Triad[4].

2. Public Meeting. The Permittees shall host a public meeting for interested stakeholders. The meeting must include a review of the independent, third-party technical review for alternative options; the preferred treatment process; and a discussion of the safety mechanisms and contingencies that will be utilized to ensure the protection of human health and the environment during operations. The public meeting must provide an opportunity for the public to ask questions and receive answers or to provide comments for the consideration by the Permittees. The Permittees shall provide at least seven (7) business days of public notice prior to hosting the public meeting and shall provide reasonable accommodation for meaningful participation.

A notice for the public meeting was provided to the public 13 days prior to the public meeting. The Public Meeting occurred August 20, 2025. At the Public Meeting, DOE and Triad discussed the FTWC operations and the Independent Technical Review and report and subject matter

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(NESHAP), 40 C.F.R. Part 61, Subparts A and H, Standards for Emissions of Radionuclides Other than Radon from Department of Energy Facilities.

[3] DOE and Triad dispute that NMED had any authority to impose these "criteria." NMED has no authority to regulate the radioactive component of the FTWCs (tritiated water, or the byproducts of the radiolysis of tritiated water) that caused the need to pressure mitigate the FTWCs. See Response to June 9, 2025, Letter, Temporary Authorization Los Alamos National Laboratory Hazardous Waste Facility Permit, Invocation of Dispute Resolution for Request for Waste Treatment, Storage, and Repacking Temporary Authorization (July 9, 2025) (https://permalink.lanl.gov/object/tr?what=info:lanl-repo/eprr/ESHID-603901).

[4] Approval with Modifications of Temporary Authorization Request Class 2 Permit Modification for Waste Treatment, Storage, and Repackaging of Four Flanged Tritium Waste Containers LANL Hazardous Waste Facility Permit Los Alamos National Laboratory EPA ID#NM NM0890010515 HWB-LANL-19-033 (https://permalink.lanl.gov/object/tr?what=info:lanl-repo/eprr/ESHID-603914)

experts were available to, and did, answer in-person and virtual public questions. A meeting summary was provided to NMED as required.

3. Tribal Consultation. The Permittees shall host a tribal consultation with interested tribal governments related to the independent, third-party technical review for alternative options; the preferred treatment process; and a discussion of the safety mechanisms and contingencies that will be utilized to ensure the protection of human health, environment, and cultural practices. This is in addition to any tribal consultation conducted by the NMED.

A Tribal Consultation meeting took place on August 20, 2025 prior to the public meeting. Twenty-seven tribes and pueblos were invited to participate in the Tribal Consultation and the Pueblos of Santa Clara, San Ildefonso, Cochiti, Jemez, San Felipe, Pojoaque, Tesuque, and Nambe were in attendance. One-on-one technical exchange meetings also occurred with the Pueblos of San Ildefonso and San Felipe, who requested individual meetings in response to a standing NNSA invitation to provide individual briefings on the FTWC operations. FTWC operations information including the independent technical report was provided in these consultations and discussions addressed alternative options and the safety mechanisms and contingencies used to ensure protection of human health, the environment, and cultural practices. DOE and Triad considered the tribal input, including providing additional technical information on the Laboratory's website.

4. Compliance Audit. The Permittees shall retain an independent third-party auditor to conduct a hazardous waste compliance audit of its operations. The independent, third-party auditor review report shall be provided to NMED. Such a report shall be a matter of public record and made available to the public on the Permittees website.

The Compliance Audit's scope was addressed with NMED at length prior to the audit's conduct to ensure the Audit's scope met expectations. The Compliance Audit was conducted and the compliance auditor's report was provided to NMED, made a matter of public record, and made available to the public on the Laboratory's website by August 18, 2025.

The Compliance Audit focused on the past procedures and the causes for the contents of the FTWCs to be packaged as mixed waste, as well as the compliance history for the FTWCs. The Compliance Audit found that the FTWCs were managed in a safe and compliant manner consistent with the New Mexico Hazardous Waste Act and its implementing regulations. The Compliance Audit further found that, "[w]hile initially packaged in accordance with the Area G Waste Acceptance Criteria (WAC) as low-level waste, a routine internal compliance audit raised a question about the application of the mass-balance provisions. Conservatively, LANL recategorized these four containers [the FTWCs] as mixed waste and began managing them in accordance with RCRA requirements. Subsequent process improvements have incorporated the audit functions into the Waste Compliance and Tracking System process, effectively preventing recurrence."

Additionally, since the generation of these waste containers in 2007, as part of corrective actions associated with the 2016 Settlement Agreement and Stipulated Final Order HWB-14-20, the Laboratory conducted comprehensive reviews and revisions of its waste management policy and training and all aspects of waste characterization, compatibility, and treatment processes

across the facility.[5] Corrective actions completed to prevent reoccurrence of waste characterization and treatment alleged noncompliance included a complete review and alignment of waste characterization processes and chemical compatibility evaluations as part of waste generation, the implementation of a more robust waste characterization re-evaluation process to ensure that activities or waste generating processes have not changed, review and update of waste management training for generators and waste management personnel, and improved communication with the NMED regarding waste treatment and waste management operations.[6] These corrective actions were implemented to improve safety awareness in waste compatibility, including prevention of creating waste containers that may need emergency venting and other emergency disposition.

Many of the updated waste management procedures were provided to the NMED as evidence of completion of the 2016 response actions conducted under the Stipulated Final Order. The Permittees continue to provide annual updates to the NMED regarding revisions to waste procedures, thus providing status regarding the Permittees' commitment to continuous improvement. These revision updates include the current status of procedures that were developed and implemented specifically to enhance safety and compliance in waste characterization, packaging, and storage operations at the Laboratory and include the LANL waste management policy, waste characterization, waste compatibility, characterization reviews, waste treatment reviews, compliance assurance practices, and documentation of operating record. As evidenced from the updates over the past 10 years,[7] the Laboratory is proactive in reviewing and reevaluating policies and procedures to keep Laboratory waste management practices in compliance.

Despite no legal requirement to do so, the Laboratory satisfied NMED's four criteria.[8] NMED agreed that the Laboratory satisfied these four criteria. "NMED reviewed the Request [for Temporary Authorization], and Criteria Response[9], and Tribal Feedback and Public Comments, and finds that the Request and Criteria meets the compliance with the standards of 40 CFR § 264, and § 270.42(e)(3)(ii)" and that "[u]pon review of the documentation provided by the Permittees, NMED finds the documentation sufficient to support the issuance of temporary authorization."

Despite recognizing that its criteria were satisfied and approving the Temporary Authorization request, NMED further imposed "non-negotiable modifications" on its Temporary Authorization approval in September 2025.[10] These non-negotiable modifications were:

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[5] Settlement Agreement and Stipulated Final Order HWB-14-20, Annual Report for Period Ending July 22, 2025 (EPA ID# NM0890010515) (https://permalink.lanl.gov/object/tr?what=info:lanl-repo/eprr/ESHID-603907)
[6] Response to Ordered Action 1; Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20 (https://srorlgreen.lanl.gov/object/tr?what=info:lanl-repo/eprr/ESHID-601353)
[7] Settlement Agreement and Stipulated Final Order HWB-14-20, Annual Report for Period Ending July 22, 2025 (EPA ID# NM0890010515) (https://permalink.lanl.gov/object/tr?what=info:lanl-repo/eprr/ESHID-603907)
[8] *See also* Los Alamos National Laboratory's Flanged Tritium Waste Container Temporary Authorization Request and Mitigation Project is Compliant with Law and Protective of Worker Safety, Public Health, and the Environment, and Should be Approved by August 29, 2025 (August 22, 2025) (https://permalink.lanl.gov/object/tr?what=info:lanl-repo/eprr/ESHID-603913)
[9] *See* supra n. 4.
[10] For reasons similar to NMED's lack of authority to impose "criteria," NMED had no authority to impose "non-negotiable modifications." *See* supra n. 3.

1. The Permittees shall ensure positive verification that the capture system AL-M1 has adequate capacity to fully and efficiently capture headspace gases. To prevent breakthrough, the Permittees will validate, between each FTWC depressurization evolution, that the AL-M1 loading ratings are not exceeded. Upon finding a loading risk, the Permittees will use an unloaded AL-M1 for the next FTWC.

Prior to and after every depressurization evolution, the Laboratory inspected the capture system AL-M1 and confirmed it posed no overloading or breakthrough risk and replaced as necessary.

2. The Permittees shall change the administrative hard stop emissions limit from 8 mrem to 6 mrem to the maximally exposed individual for the entire FTWC treatment process. This is below the EPA's CAP 88 standard.

The Laboratory reduced the hard stop emissions limit from 8 millirem to 6 millirem to the Maximally Exposed Individual (MEI) for the entire FTWC operations. Ultimately, the radiological dose to the hypothetical MEI from FTWC operations emissions was 0.012 millirem, which was based on numerous conservative assumptions and was only 0.2% of the reduced limit.

3. The Permittees shall notify the public and tribal communities in writing in English and Spanish no less than three days prior to commencing operations to allow surrounding communities and persons time to adjust their activities in an abundance of caution as they deem necessary.

The Laboratory provided the requested notice via email on September 9, 2025. Additionally, the Laboratory provided daily and sometimes hourly (as applicable) updates on the status and next steps of the FTWC operations on the Laboratory's website.[11]

4. Permittees shall communicate with the public and engage in tribal consultation following completion of the proposed activities. The Permittees shall provide meaningful public and government to government engagement. At a minimum, the Permittees shall conduct a post-activity meeting within 30 days of completing the treatment process and provide advance notification to the public about participation options. The Permittees shall provide audio and visual support during the meeting sufficient to allow unrestricted virtual attendance and commenting; and must provide information to be presented prior to the meeting for public access and review, including but not limited to sampling and modeling data. Within two days of this post-activity meeting, the Permittees shall post a recording of the public meeting. Within two weeks of this post-activity meeting, the Permittees shall post a comments and response table.

The Laboratory conducted a public meeting on December 9, 2025, within thirty days of dispositioning the FTWCs off-site.[12] Appropriate notice and technical support, and unrestricted in-person and virtual attendance, was provided and a recording of the public meeting and a comments and response table was posted to the Laboratory's website. Laboratory subject matter experts provided an overview of the FTWC operations, including diagrammatic and

[11] *See* Flanged Tritium Waste Containers | Los Alamos National Laboratory.
[12] The FTWC operations did not constitute treatment, but, rather, were operations to address radioactive safety, followed by the storage and shipment off-site for final disposal of waste. The public meeting occurred within 30 days of the dispositioning of the FTWCs off-site.

photographic representations, and discussed operational requirements, FTWC operations emissions, including the FTWC Radioactive Air Emissions Summary, Volume 1 Stack Emissions & Off-Site Dose Consequence, and application of the As Low as Reasonably Achievable principles. One post-operation tribal interaction was requested and completed with Tesuque Pueblo.

5. Permittees must publish a final report documenting the treatment process and all analytical results, including summaries of activities, lessons learned, and photographic documentation of the process to the public, along with any other information provided to EPA or NMED to demonstrate adherence to permit and this temporary authorization's conditions.

The Laboratory published the FTWC Radioactive Air Emissions Summary, Volume 1 Stack Emissions & Off-Site Dose Consequence on November 14, 2025.[13] [14] Volume 1 summarizes operations, documents emissions measurements, and reports radiological dose to the Maximally Exposed Individual (MEI) resulting from the FTWC operations. Over the course of 13 operational days, the FTWC operations had air emissions, conservatively estimated, of 123 curies of tritium (hydrogen-3). The radiological dose, conservatively estimated, to the hypothetical MEI from these emissions was 0.012 millirem, significantly below the 10 millirem limit established by EPA at 40 C.F.R. § 61, Subpart H, and significantly below NMED's requested 6 millirem limit. The dose to the hypothetical MEI was indistinguishable from background.

The Laboratory published the FTWC Radioactive Air Emissions Summary, Volume 2 Environmental Sampling & Expanded Plume Modeling on February 17, 2026.[15] Volume 2 summarizes downwind sampling results, explores different plume modeling scenarios, and addresses questions about age-dependent dose calculations. The report concludes that there were no measurable environmental effects from FTWC operations. There was no soil deposition measured, no change in tritium vapor concentrations measured at Airnet stations, and no measurable conversion of hydrogen gas to water vapor in the area. Comparing different plume models and evaluation scenarios, Volume 2 demonstrated that EPA's compliance model CAP88 provides a conservative, bounding assessment of public dose from airborne releases and radionuclides. No model indicated any health effects or regulatory issues from FTWC operations. Under all scenarios examined and for all receptor ages, public dose from FTWC emissions was less than 0.1 millirem.

The Laboratory submitted a closure certification report on February 13, 2026[16]. The Weapons Engineering and Tritium Facility was temporarily permitted as part of the operations associated with the storage and potential repackaging of the FTWCs prior to their shipment offsite. The closure certification report summarizes the Laboratory's activities to meet Resource Conservation and Recovery Act (RCRA) closure requirements for temporary storage of the

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[13] FTWC Radioactive Air Emissions Summary, Volume 1 Stack Emissions & Off-Site Dose Consequence (https://permalink.lanl.gov/object/tr?what=info:lanl-repo/eprr/ESHID-603931)
[14] *See supra* n. 12 regarding the absence of treatment in the FTWC operations.
[15] FTWC Radioactive Air Emissions Summary, Volume 2 Environmental Sampling & Expanded Plume Modeling (https://permalink.lanl.gov/object/tr?what=info:lanl-repo/eprr/ESHID-603942)
[16] Transmittal of Los Alamos National Laboratory Closure Certification Report for Temporary Waste Treatment, Storage, and Repackaging Unit EPA ID #NM0890010515 (https://permalink.lanl.gov/object/tr?what=info:lanl-repo/eprr/ESHID-603940)

FTWCs at the Weapons Engineering and Tritium Facility. The closure certification report describes how closure activities were performed in accordance with the approved closure plan with deviations, as discussed in the closure certification report, and provides photographic documentation of the process. Analytical results from swipe samples were all non-detections for lead, which was the FTWC hazardous waste component. The Laboratory met the closure performance standards for the temporary storage area at the Weapons Engineering and Tritium Facility and it should be considered a clean closed unit.

6. In accordance with 40 CFR 270.42(a)(1)(ii), the Permittees must provide a notification of this permit modification to all persons on the LANL facility mailing list, maintained by the NMED Hazardous Waste Bureau, within ninety days of incorporation of this permit modification.

A mailing was completed to the NMED-maintained LANL facility mailing list, with a postmark date of November 13, 2025, to meet the requirement outlined in 40 C.F.R. § 270.42(a)(1)(ii).

7. The Permittees shall notify NMED, the EPA, tribal communities, and the public of any potential threat to public health within 15 minutes of any problems during the treatment process that result in an unanticipated release of tritium exceeding the conditions of this temporary authorization.

Though Triad was ready to provide notice, the Laboratory's FTWC operations resulted in no potential threat to public health and no unanticipated releases of tritium exceeding the conditions of the Temporary Authorization occurred.

The Laboratory has completed the FTWC operations. The Laboratory conducted the FTWC operations in compliance with all applicable law, in conformance with NMED's Temporary Authorization with its additive criteria. The FTWC operations were performed safely and were performed in a manner protective of human health and the environment.

Sincerely,

STEVEN A. COLEMAN (Affiliate)
Digitally signed by STEVEN A. COLEMAN (Affiliate)
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Steven A. Coleman
Associate Laboratory Director
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Triad National Security, LLC
Los Alamos National Laboratory

Sincerely,

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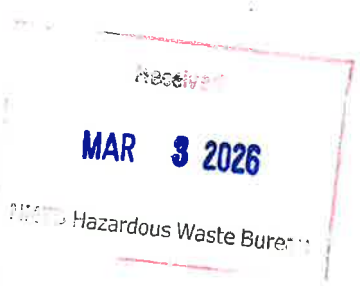
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[2] Pressure mitigation operations are governed by the Atomic Energy Act (AEA), 42 U.S.C. § 2011, *et seq.*, pursuant to which the Laboratory's FTWC operations complied, and by the U.S. Environmental Protection Agency (EPA), which approved the FTWC operations pursuant to EPA's National Emission Standards for Hazardous Air Pollutants