NMED Briefing Objectives

1. Project Overview
2. Permit Modification Request Content and Schedule
3. Coordination/Integration between LANL and NMED
CURRENT TRU WASTE STORAGE AREA AT TA-54
TRU Waste Facility Functional Requirements

**Waste Generators**
- TA-55
- CMR (TA-3)
- RLWTF (TA-50)
- OSR (from off-site)

**EWM TRU Facility**
- Visual Examination (VE) Certified Drums
- Super HENC Characterization/Certification
- TRU RCRA Storage
  - SWB
  - SWB
  - OSB
  - SLB2

**RANT TA-54-38 Area**
- RCRA Pad
- F1 Staging
- RANT Building F5 Assemble Payload, Load

**Scope no longer in TWF Project**
- Decontamination
- Repackaging
- Size Reduction
- Loading to WIPP

**Ship To WIPP**
- SLB2, WIPP Cert @ SRS

Los Alamos National Laboratory
Operated by Los Alamos National Security, LLC for the U.S. Department of Energy’s NNSA
Planned TA-63 Layout
Storage Facility Design

TRANSURANIC (TRU) WASTE FACILITY

STORAGE & CHARACTERIZATION BUILDING

TYPICAL STORAGE BUILDING
TRU Waste Facility Design Features

- TWF is designed as a Category 2 Nuclear Facility
- Oversight by Defense Nuclear Safety Board (DNFSB)
- Rigorous Safety Analysis with Safety Class and Safety Significant Systems
- Six (6) storage buildings, steel-framed medium construction, 33’W x 60’L x 15’H
  - 240 Drums per bldg., stacked 3 high (5 total)
  - One of the storage buildings also used for gas sampling / analysis and larger waste container storage
- Characterization Pad for Non-Destructive and Radiography analysis trailers
- 1 RCRA permitted hazardous waste management unit
- Firewater/Storm Water Retention Pond
### TWF RCRA Permit Modification Schedule

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**JULY 2011** - LANL submits Permit Modification Request

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TWF RCRA Permit Modification Activities

- Seismic Geological Field Work & Report Analysis
- Design Funding Authorized
- Submit Seismic Hazards Report to NMED
- RCRA Team prepares TWF RCRA permit modification, LANL moderates pre-submittal public meeting
- Design Deliverables for RCRA Permit
- Incorporation of lessons learned from NMED NOD comments on previous
- Permit modification application submitted to NMED
- Publication of public comment notice
- Public Information Meeting
- End of Public Comment Period
- Permit modification approval timeframe
- NMED Approves and Issues TWF RCRA permit modification

Up to 12 Months
Permit Modification Request for TWF Project

- Request for approval by the New Mexico Environment Department (NMED) of a permit modification to the LANL Hazardous Waste Facility Permit to allow construction of the TRU Waste Facility (LANL submission July 2011).

- The PMR will contain extensive descriptions of the facility and waste management processes to enable NMED to approve subject to the New Mexico Hazardous Waste Act regulations.

- Informed Consent Campaign – The PMR process will include:
  - one-on-one Community and Tribal Government meetings,
  - pre-submittal public information meeting (June 27),
  - a comment period with public meeting (mid-August), and
  - a potential hearing to inform and obtain public input into the approval.
Recommendation for a Class 2 Permit Mod

- TRU waste facility provides replacement waste storage, no new capabilities, subject to existing permit conditions

- Compliant with regulations:
  - Permit Modification Classification at 40 CFR 270.42, Appendix I, F.1.b states "Modification or addition of container units: ...resulting in up to 25% increase in the facility's container storage capacity..." is a Class 2.
  - Applicability interpretation of the regulation is based on LANL permit (Part 1.8) and regulatory (40 CFR 260.10) definitions of "facility" and "hazardous waste management unit."
  - TWF facility will represent approximately 15% of LANL total capacity as listed in Table J-1 of the LANL permit, excluding Area G capacity (assumes Area G will be closed or capacity scheduled for removal from the permit).

- There is equal opportunity for public participation in both Class 2 and 3 PMRs.
Coordination/Integration between LANL and NMED

- Preliminary NMED concurrence with project and PMR content being sought.
- RCRA waste management function limited to storage.
- Key Support Documents (e.g., seismic report) submitted early for review.
- Facility Operations will be consistent with LANL-wide procedures approved in the new LANL permit.
- PMR development will incorporate comments raised in requests for additional information for the previous TA-52 TWF in 2007.
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Backup Slides