

Permit



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Mr. John E. Kieling
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

RECEIVED

NOV 26 2014

NMED
Hazardous Waste Bureau

Dear Mr. Kieling:

Subject: Notification of Anticipated Noncompliance with the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, EPA ID No. NM890010515

The purpose of this letter is to notify the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) of an anticipated noncompliance as required by the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit). This notification is being made to the NMED-HWB by the U.S. Department of Energy National Nuclear Security Administration (NNSA), and the Los Alamos National Security, LLC (LANS) (collectively, the Permittees). Permit Section 1.9.11 states that the Permittees shall give advance written notice to the Department of any planned changes to any permitted unit at the Facility or activity which may result in noncompliance with Permit requirements (*see* 40 CFR § 270.30(1)(2)).

Enclosure 1 is a list of standard waste boxes (SWBs), currently covered under the *LANL Nitrate Salts-Bearing Waste Container Isolation Plan, Revision 2*, located at TA-54, Area G, that are currently being used as overpack containers for 55-gallon waste drums. The SWBs currently being stored have been assigned a U.S. Environmental Protection Agency (EPA) Hazardous Waste Number for ignitability (D001). Therefore, Permit Section 2.8.1 is applicable to management of these waste containers. Permit Section 2.8.1(4) requires the use of “non-sparking tools when managing hazardous waste containers that contain ignitable or reactive wastes.”



The Permittees will revise the *LANL Nitrate Salts-Bearing Waste Container Isolation Plan, Revision 2*, dated September 19, 2014 to reflect the activities below.

The aforementioned SWBs must be opened in order to obtain measurements with monitoring equipment and eventually remediate and/or manage the 55-gallon waste drums within the SWBs. To the extent possible, opening of the SWBs listed in Enclosure 1 will be conducted by use of non-sparking tools. These tools will be made of a combination of aluminum, bronze, copper and/or beryllium. However, the SWBs were designed to prevent the repeated opening and closing of the container, and the lid of the SWB is bolted into place and an adhesive is used to ensure the integrity of the closure. For these reasons, it is possible that the Permittees are unable to open the SWBs with the non-sparking tools, and would need to use other tools that may potentially cause a spark. Since the SWBs serve as overpack (i.e., an outer container) for the 55-gallon waste drums, it is unlikely that the waste within the 55-gallon drums would be affected by any potential sparking. However, if the use of potentially spark producing tools is required the Permittees will take the precautions to ensure safe management and minimize the potential hazard to the environment and human health. These precautions include the following:

- The SWBs will be opened in a PermaCon which is equipped with a fire suppression system, high-efficiency particulate air (HEPA) filtration, and is temperature controlled; and
- Prior to opening a hydrogen sample will be collected from each SWB to ensure that the hydrogen levels are below the lower flammable limit (LFL). If levels are above 80% (32,000 ppm) of the 4% (40,000 ppm) LFL for hydrogen the SWBs will not be opened.

This letter serves as a notification for the potential of an anticipated noncompliance associated with Permit Section 2.8.1(4). As it applies, tracking of this noncompliance will be included in the fiscal years 2014 and 2015 reporting of other noncompliances as required by Permit Section 1.9.14.

If you have comments or questions regarding this notification, please contact Gene E. Turner (DOE) at (505) 667-5794 or Mark Haagenstad at (505) 665-2014.

Sincerely,



Alison M. Dorries
Division Leader
Environmental Protection Division
Los Alamos National Security LLC

Sincerely,



Gene E. Turner
Environmental Permitting Manager
Environmental Projects Office
Los Alamos Field Office
U.S. Department of Energy

AMD:GET:TAD/lm

Enclosure 1: List of SWBs that Contain Ignitable Waste at TA-54 Area G

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ENCLOSURE 1

List of SWBs that Contain Ignitable Waste at
TA-54 Area G

ENV-DO-14-0275

LAUR-14-27144

Date: NOV 26 2014

Standard Waste Boxes with D001 Code Applied

#	SWB #	Cont Type
1	LA00000068430	SWB
2	LA00000068507	SWB
3	LA00000068567	SWB
4	LA00000068624	SWB
5	LA00000068631	SWB
6	LA00000068638	SWB
7	LA00000068685	SWB
8	LA00000069013	SWB
9	LA00000069015	SWB
10	LA00000069036	SWB
11	LA00000069298	SWB
12	LA00000069417	SWB
13	LA00000069445	SWB
14	LA00000069519	SWB
15	LA00000069520	SWB
16	LA00000069548	SWB
17	LA00000069553	SWB
18	LA00000069559	SWB
19	LA00000069568	SWB
20	LA00000069598	SWB
21	LA00000069604	SWB
22	LA00000069615	SWB
23	LA00000069616	SWB
24	LA00000069618	SWB
25	LA00000069620	SWB
26	LA00000069630	SWB
27	LA00000069633	SWB
28	LA00000069634	SWB
29	LA00000069635	SWB
30	LA00000069636	SWB
31	LA00000069637	SWB
32	LA00000069638	SWB
33	LA00000069639	SWB
34	LA00000069641	SWB
35	LA00000069642	SWB
36	LA00000069644	SWB
37	LA00000069645	SWB
38	LA00000070503	SWB
39	LA00000093605	SWB
40	LA00000094068	SWB
41	LA00000094227	SWB
42	SB02198	SWB
43	SB02203	SWB
44	SB50069	SWB
45	SB50073	SWB

46	SB50418	SWB
47	SB50431	SWB
48	SB50442	SWB
49	SB50443	SWB
50	SB50448	SWB
51	SB50451	SWB
52	SB50452	SWB
53	SB50522	SWB
54	SB50529	SWB
55	SB50559	SWB