Permit

Los Alamos
NATIONAL LABORATORY
EST 1943

Environmental Protection Division
Environmental Compliance Programs (ENV-CP)
PO Box 1663, K490
Los Alamos, New Mexico 87545
(505) 667-0666

National Nuclear Security Administration
Los Alamos Field Office, A316
3747 West Jemez Road
Los Alamos, New Mexico, 87545
(505) 667-5794/Fax (505) 667-5948

Date: DEC 1 7 2015
Symbol: ENV-DO-15-0343
LA-UR: 15-29370
Locates Action No.: N/A

RECEIVED

NMED
Hazardous Waste Bureau

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

Dear Mr. Kieling:

Subject: Notification of Class 1 Modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit Contingency Plan, EPA ID # NM0890010515

The purpose of this letter is to notify the New Mexico Environment Department's Hazardous Waste Bureau (NMED-HWB) of a Class 1 permit modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit). This Permit was issued to the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), the Permittees, in November 2010. This permit modification provides revisions to Attachment D, *Contingency Plan* by updating a name and address, removing a redundant sentence from the Technical Area (TA) Area L communication equipment section, and updating the TA-3 emergency equipment to clarify and update the names of emergency response organizations.

The proposed changes have been prepared in accordance with the Code of Federal Regulations [CFR], Title 40 (40 CFR) § 270.42(a)) and 270.42, Appendix I, Items A.1, B.6.b and B.6.d.

This permit modification includes this letter and an enclosure with two attachments. Enclosure 1 contains a description of the necessary permit modification, text edits in redline strike-out, and a signed certification page. Three hard copies and one electronic copy of this submittal will be delivered to the NMED-HWB. The hardcopy submittal contains pages or sections where text has been changed rather than copies of full attachments of the Permit. The electronic copy, provided only to the NMED-HWB, contains a reproduction of the hardcopy in portable document format (PDF) and the word processing files used to create the hardcopy.

Upon submittal of this Class 1 permit modification, the modification will become effective and notice will be sent to the NMED-HWB-maintained LANL facility mailing list in accordance with 40 CFR § 270.42(a)(1)(ii) within ninety days of the transmittal of this permit modification.

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

Sincerely,

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

Sincerely,

Kimberly Davis Lebak
Manager
Los Alamos Field Office
U.S. Department of Energy

AMD:KDL:MPH:CLJ/lm

Enclosures: (1) Class 1 Permit Modification Notification: Updates associated with Attachment D, Contingency Plan of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, December 2015 and Certification

Cy: Laurie King, USEPA/Region 6, Dallas, TX, (E-File)
Dave Cobrain, NMED/HWB, Santa Fe, NM, (E-File)
Neelam Dhawan, NMED/HWB, Santa Fe, NM (E-File)
Siona Briley, NMED/HWB, Santa Fe, NM (E-File)
Peter Maggiore, LASO-OOM, (E-File)
Lisa K. Cummings, LASO-OC, (E-File)
Gene E. Turner, LASO-NS-LP, (E-File)
Jordan Arnswald, LASO-NS-PI, (E-File)
Kirsten Laskey, EM-LA, (E-File)
Craig S. Leasure, PADOPS, (E-File)
Amy E. De Palma, PADOPS, (E-File)
Michael T. Brandt, ADESH, (E-File)
Raeanna Sharp-Geiger, ADESH, (E-File)
Alison M. Dorries, ENV-DO, (E-File)
Mark P. Haagenstad, ENV-CP, (E-File)
Cathy Juarez, ENV-CP, (E-File)
Lyle W. Cary, SEO-DO, (E-File)
Marla J. Brooks, SEO-3, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
locatesteam@lanl.gov, (E-File)
rcra-prr@lanl.gov, (E-File)
epccat@lanl.gov, (E-File)
env-correspondence@lanl.gov, (E-File)

ENCLOSURE 1

Class 1 Permit Modification Notification: Updates Associated with Attachment D, Contingency Plan of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, December 2015 and Certification

ENV-DO-15-0343

LA-UR-15-29370

Date: DEC 1 7 2015

Permit Modification Notification

This document contains a notification for a Class 1 Permit Modification to update the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit). The text modifications are provided herein and have been made to the Permit by the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), collectively the Permittees. The modifications to the text of the Permit have been identified using red text and red lines through the texts for deletions.

Description

This modification includes Attachment 1 that provides updates within Attachment D, *Contingency Plan*; changes within D.1.1 updating the emergency managers and contact information, and changes to Table D-1 of both the Technical Area (TA) TA-3 and TA-54 Area L emergency equipment list. A certification page in accordance with the requirements of Title 40 of the Code of Federal Regulations (40 CFR) § 270.11 is included in Attachment 2.

Within Section D.1.1., a replacement emergency manager has been incorporated. The description of contingency planning at TA-3 has been updated to reflect changes to the facility-specific response plan name and to reflect that the facility specific response team has been deferred directly to the institutional response which is reflected within the rest of the *Contingency Plan*. Changes to the emergency equipment list reflect the accurate number of fire hydrants within the vicinity and reflect that appropriate fire extinguishers that will be present at the unit, and will be functionally equivalent and appropriate for the waste stored within the unit. Lastly, redundant language about communication equipment has been removed from Table D-1, TA-54, Area L, Emergency Equipment.

Basis

This permit modification incorporates updated information and makes emergency equipment changes that meet the conditions for Class 1 permit modifications listed within Appendix I of 40 CFR §270.42 and has been drafted accordance with 40 CFR § 270.42 (a)(1). Attachment D, *Contingency Plan,* requires updates that meet the conditions of the following items specified in 40 CFR §270.42, Appendix I:

1. Item B.6.d - organizational name and contact updates,
2. Item B.6.b - upgrades and relocation of emergency equipment, and
3. Item A.1 - administrative and informational changes

Attachment 1

Revised Permit Text

ATTACHMENT D

CONTINGENCY PLAN

4. The IC (*e.g.*, SEO-3:EM Duty Officer) coordinates all groups and agencies responding to the emergency and personnel operating at the scene using the ICS. The General Hazardous Waste Emergency Notification Structure, illustrated on Figure D-1, is designed to expand and contract, as appropriate, to include the response groups/agencies needed to address any particular emergency. The EOSC provides notification to on-site and off-site groups and agencies for both response requests and information.

5. The IC may appoint and utilize a network of support personnel to assess, plan for, and mitigate emergencies. These personnel can include, but are not limited to, a Safety Officer, a Public Information Officer, and a Liaison Officer that report directly to the IC and are responsible for issues related to safety, information, and the interaction of various groups associated with the overall emergency. Also reporting directly to the IC are an Operations Section Chief, Logistics Section Chief, Planning Section Chief, and an Administrative Section Chief. The Operations Section Chief oversees the Fire Branch, the Emergency Medical Services Branch, and the Hazardous Material Group, and is responsible for mitigating the emergency response. The Logistics Section Chief is responsible for providing support personnel and equipment necessary for the emergency response. The Planning Section Chief is responsible for planning the mitigation and recovery activities for the emergency. The Administrative Section Chief is responsible for keeping records of expenditures. These ICS positions are listed in Figure D-1. The appropriate ICS positions will be activated as the emergency warrants. During an emergency at the Facility, assistance may be provided to the IC and the IC's appointees by a large variety of response groups/agencies. The responsibilities and/or assistance available from the various response groups/agencies are discussed briefly in Attachment Sections D.1.2 through D.1.7 and the appropriate representatives will be contacted during an emergency as appropriate.

6. The Permittees shall provide a copy of this Contingency Plan and any revisions to each of the emergency response groups/agencies (including the LAPD, LAFD, LAMC, and the State of New Mexico's Department of Homeland Security and Emergency Management (DHSEM) Area 3 Emergency Management Coordinator).

D.1.1 Emergency Operations-Emergency Management Group

1. The Permittees shall delegate the authority and responsibility for administering and implementing the Facility's emergency management program to the Security and Emergency Operations (SEO) Division, which includes SEO-3:EM. SEO Division personnel shall coordinate and issue the Facility's Los Alamos National Laboratory and Los Alamos Field Office Hazardous Materials Program Plan; SEO-3:EM provides response coordination for emergencies. SEO-3:EM provides a 24-hour Emergency Operations Support Center (EOSC) for the Facility and an Emergency Manager serving as the 24-hour Duty Officer to respond to emergencies, including hazardous and mixed waste releases. The Facility Emergency Manager (*i.e.,* the SEO-3:EM Duty Officer) is the functional equivalent of the Emergency Coordinator (40 CFR § 264.55). The SEO-3:EM maintains an Emergency Operations Center (EOC) in a ready condition, should a center be required. The primary EOC is located at TA-69, Building 33 (TA-69-33). An alternate mobile EOC is equipped and ready for immediate deployment. Should an

EOC be activated during an emergency, additional emergency personnel can be requested by the IC through the EOC.

2. Assignment as the SEO-3:EM Duty Officer is rotated. The Duty Officer can be reached 24 hours a day by contacting the EOSC at 667-6211.

3. The SEO-3:EM Duty Officer will respond to emergency incidents involving the release of hazardous or mixed waste to the environment, including spills, fires, and explosions. With input from the appropriate Facility groups, the SEO-3:EM Duty Officer shall initially assess the possible hazards to human health or the environment and, if assuming incident command, shall use whatever response personnel and/or emergency equipment necessary to control and contain the waste. In the event of an emergency, the SEO-3:EM Duty Officer typically becomes the IC with full responsibility for field activities. As described previously, the exception to this is when on-site personnel can adequately address the emergency and maintain incident command internally.

4. The SEO-3:EM Duty Officer responding to an emergency shall have access to various tools to include Emergency Actions Levels with prescribed protective actions and ChemLog with a current chemical inventory of the appropriate building(s) in the area in which the incident is occurring. These tools shall be maintained by the EOC with assistance from the facility manager where a waste management unit is located and shall be available at the EOC at TA-69; located on-site for use by emergency response personnel; and available to SEO-3:EM Duty Officers by computer. The various response groups shall obtain specific information relating to the facilities involved (including the layout of all affected buildings; the location of evacuation routes, equipment, and personnel; properties of the materials/wastes managed at the facility; and the hazards associated with these materials/wastes) from other site-specific information.

5. The Permittees shall ensure that the names, addresses, and telephone numbers listed below are the current Primary and Alternate Emergency Managers.

Primary:

Brenda Andersen
3926 A Alabama
Los Alamos, NM
(H) 505-662-4173
(W) 505-667-6211
(C) 505-699-1144

Alternates:

Ron Huerta
P.O. Box 923
Alcalde, NM
(H) 505-852-0286
(W) 505-667-6211
(C) 505-412-8434

~~Wil Martinez~~
~~120 A RA CR 92~~
~~Chimayo, NM~~
~~(H) 505-351-2340~~
~~(W) 505-667-6211~~
~~(C) 505-412-8135~~

Peter Salazar
912 Calle Quintana
Espanola, NM
(H) 505-747-1399
(W) 505-667-6211
(C) 505-500-2594

Dave McClard
23 Ojito Drive
Espanola, NM
(H) 505-412-8945
(W) 505-667-6211
(C) 505-699-0803

6. To assure timely notifications and immediate response during an emergency, the Permittees shall ensure that the telephone numbers 911 or 667-6211 are contacted to obtain the on-call SEO-3:EM Duty Officer.

D.1.2 Hazardous Materials Response

1. The Hazardous Materials (HAZMAT) Group is responsible for the aggressive mitigation of chemical, radiological, hazardous waste, and mixed waste emergencies, including field decontamination of responders and response equipment. At the request of the IC, the HAZMAT Group may provide limited field decontamination support for victims. The HAZMAT Group is capable of providing a decontamination station at the scene of a hazardous material incident to process people working in a contaminated area and is prepared to perform decontamination of personnel. The HAZMAT Group shall meet the training criteria for emergency response personnel specified in the Code of Federal Regulations, Title 29, §1910.120(q)(6)(iii), (iv), and (v). The HAZMAT Group acts as part of the ICS reporting directly to IC, or the Operations Section Chief if the position is staffed.

TA-3

ATTACHMENT D

CONTINGENCY PLAN

TA-3

ATTACHMENT D

CONTINGENCY PLAN

Specific information on emergency response resources and release prevention/mitigation at TA-3 is provided below.

The CMR Building at the Facility has a facility-specific ~~Emergency Management Plan (EMP)~~Alarm/Emergency Response Instruction (AERI) to ensure that emergency planning and preparedness for the CMR Building are commensurate with the facility and the nature of work performed there and to provide sufficient subject matter experts at the facility, should an emergency occur.

The Alarm/Emergency Response Instruction ~~EMP~~ establishes the CMR Facility Emergency Response~~ Organization~~, which is comprised of a ~~facility Emergency Response Team (ERT~~), Facility Incident Command (FIC), and the CMR Operations Center. ~~The CMR ERT is a 2 member group of volunteer facility personnel trained to provide initial response to emergencies.~~ The FIC is comprised of division and line managers and key personnel who respond to pre-designated locations for the purpose of initial command and control of events that occur during CMR Building emergencies. The CMR Operations Center is the emergency communications focal point and has the responsibility of development and maintenance of alarm response instructions, notification lists, and call-out lists. When mitigation of the emergency is beyond the capabilities of CMR or when injuries occur or could potentially occur due to the emergency, EO-EM and the EO-EM Duty Officer is required to respond.

~~"The CMR Facility Emergency Management Plan Training for CMR Workers" (LANL, 1999).~~ The EMP has been superseded by the AERI which includes information on emergency equipment (*see* Table TA-3, D-1 of this Attachment Section); evacuation routes and primary and secondary evacuation assembly areas; and evacuation procedures for the FIC, persons wearing anti-C clothing, and persons in non-anti-C clothing. The CMR EMP also includes emergency categorization, lists of potential facility emergencies, their associated alarms, and the appropriate response to the emergency and/or the alarms. Evacuation routes, evacuation area locations, and emergency equipment are subject to change.

~~**REFERENCES**~~

~~LANL, 1999, "The CMR Facility Emergency Management Plan Training for CMR Workers," Los Alamos National Laboratory, Los Alamos, New Mexico~~

~~LANL, 1998, "Los Alamos National Laboratory General Part B Permit Application," Revision 1.0, Los Alamos National Laboratory, Los Alamos, New Mexico.~~

Table D-1

TA-3

Emergency Equipment

FIRE CONTROL EQUIPMENT

~~Dry chemical f~~Fire extinguishers are available in Rooms 9010, 9020, and 9030.

Description of General Capabilities:
Each fire extinguisher has a 10-pound minimum capacity and may be used by any qualified employee in the event of a small fire.

~~Nine~~ Twelve fire hydrants are located around the outside perimeter of Technical Area (TA) 3, Building 29 (TA-3-29). The nearest fire hydrants to Rooms 9010, 9020, and 9030 are located on the south side of Wing 9 and west of Wing 5.

Description of General Capabilities:
The fire hydrants supply water at an adequate volume and pressure to satisfy the requirements of 40 CFR § 264.32(d).

Fire alarm pull boxes are located in Rooms 9010 and 9020.

Description of General Capabilities:
Manually-operated fire alarms may be activated by any employee in the event of fire to notify the Los Alamos Fire Department (LAFD) and security personnel.

Sprinkler systems are located in Rooms 9010, 9020, and 9030.

Automatic thermal alarm systems are located in Rooms 9010, 9020, and 9030.

Description of General Capabilities:
The sprinkler systems and thermal alarm systems are heat activated. Security personnel and the LAFD are alerted when a system has been activated.

SPILL CONTROL EQUIPMENT

Spill control kits are located in Rooms 9010, 9020, and 9030. Spill kits include (but are not limited to) sorbent pillows, and/or absorbent.

Description of General Capabilities:
Sorbent is used in the event of a small spill.

COMMUNICATION EQUIPMENT

Telephones are located in the north enclosure of Room 9010, in Room 9020, and in Room 9030.

Paging phones and evacuation alarms are located in Rooms 9010, 9020, and 9030.

TA-54

ATTACHMENT D

CONTINGENCY PLAN

TABLE D-1

TA-54 AREA L

Emergency Equipment

FIRE CONTROL EQUIPMENT

Class ABC and BC rated fire extinguishers are located at Area L. Class D rated fire extinguishers are available at Area L if combustible metals are being managed. A dry-pipe sprinkler system is located at TA-54-215.

Dry chemical fire-suppression systems are located in storage sheds TA-54-68, TA-54-69, and TA-54-70.

> Description of General Capabilities:
> Fire extinguishers may be used by any qualified employee in the event of a small fire. The automatic dry-pipe sprinkler system is heat activated. Security personnel and the Los Alamos Fire Department (LAFD) are alerted when this system has been activated.

Fire alarm pull boxes are located inside TA-54-37, TA-54-39, TA-54-51, TA-54-60, TA-54-117, TA-54-210, and TA-54-221.

> Description of General Capabilities:
> Fire alarms may be activated by any employee in the event of a fire to notify the LAFD and security personnel.

Fire hydrants are located near the main site entrance to Area L and at the southeast corner of TA-54-62 inside Area L. These fire hydrants supply water at an adequate volume and pressure to satisfy 40 CFR § 264.32(d).

Freeze-proof faucets are located east of TA-54-31.

SPILL CONTROL EQUIPMENT

Spill equipment at TA-54 Area L includes the following:

- Shovels
- Oversized drums
- Absorbent (various locations on site)
- Heavy equipment from Area G available for any emergencies at Area L

Spill kits are located throughout Area L. Each kit includes bags of absorbent, caustic neutralizer, acid neutralizer, and an inventory of tools and supplies.

COMMUNICATION EQUIPMENT

Alpha numeric emergency pagers, cellular telephones with page/text capabilities, and/or two-way radios are given to employees working in the area. Personnel will carry cellular telephones, pagers or two-way radios or will have immediate access to communication equipment through visual or voice contact with another employee.

A fire alarm pull box is located at TA-54-215.

Emergency paging system-loud speaker located throughout the site. Evacuation alarms are located adjacent to the fenceline crash gates at Area L, at the northeast end of TA-54-32, the exterior west end of TA-54-215 and at TA-54-62.

~~Additional equipment includes two-way radios and cellular telephones.~~

Description of General Capabilities:
External and internal Laboratory communications which may be used in emergency situations are listed.
Fire alarm may be activated by any employee in the event of a fire to notify the LAFD and security personnel.
Employees can be notified of an emergency situation and appropriate response actions through the use of a text message sent on the emergency alpha-numeric pagers or cellular telephones with page/text capabilities.
The evacuation alarm is a pulsating sound that can be heard throughout Area L. The fire alarm is a double slow-whoop sound.
The emergency paging system can be utilized to alert workers of an emergency situation as well as appropriate response actions.

DECONTAMINATION EQUIPMENT

Emergency shower and eyewash stations are located immediately east of TA-54-31, at TA-54-215, at TA-54-39, and outside TA-54-39.

Safety Data Sheets (SDSs) are available hard copy or via online database at the facility.

Description of General Capabilities:
Emergency shower and eyewash stations are used by personnel who receive a chemical splash to the skin or eyes. Specific SDSs for the chemical(s) should be obtained prior to working with the chemical to determine if the application of water is indicated for decontamination.

PERSONAL PROTECTIVE EQUIPMENT

Personnel at Area L are required to use appropriate personal protective equipment (PPE) to protect themselves from the hazards found in the workplace under normal conditions. This PPE

Attachment 2

Certification

Document: Class 1 Contingency Plan Update
Date: December 2015

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.

12/10/15

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

Date Signed

12/16/15

Kimberly Davis Lebak
Manager, Los Alamos Field Office
National Nuclear Security Administration
U.S. Department of Energy
Owner/Operator

Date Signed