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Date: October 27, 2016
Symbol: EPC-DO-16-312
LA-UR: 16-27951
Locates Action No.: N/A

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 John E. Kieling:

Subject: Request for 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) for a Class 1 Permit Modification (requiring prior approval by the NMED-HWB) to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit) issued to the Department of Energy (DOE) and Los Alamos National Security, LLC (collectively the Permittees) in November, 2010. The Permittees request to revise Table K-1 of Attachment K, *Listing of SWMUs and AOCs* to identify four existing SWMUs and one existing AOC, as 10 new Solid Waste Management Units (SWMUs) and two new Areas of Concern (AOCs) respectively, as shown in redline in Attachment 1. Under this proposed revision, the SWMUs and AOC presently encompassing private property designated as Parcel ID 1033112480275, as well as property owned by the DOE and/or other private owners, would be designated as two or three new SWMUs or AOCs, each located on property owned by a single entity. The property designated as Parcel ID 1033112480275 (hereafter, "the former Los Alamos Inn Property") is the location of the former Los Alamos Inn and is currently owned by the Los Alamos Investors, LLC.

The proposed modification is requested to allow the Permittees to expedite the requests for certificates of completion (CoCs) for the newly designated SWMUs and AOCs located on the former Los Alamos Inn property. This outcome would also assist in transitioning the former Los Alamos Inn property from its current

vacant status to an economically productive use. The SWMUs and AOCs included in this permit modification request are part of the Upper Los Alamos Canyon Aggregate Area. The Upper Los Alamos Canyon Aggregate Area Phase II Investigation Report, which will document completion of corrective actions in the aggregate area, is due to the NMED-HWB by September 30, 2018. In order to facilitate commercial development of this site, CoCs for the portions of the SWMUs and AOCs located within the footprint of the former Los Alamos Inn property must be obtained well in advance of this date.

The proposed modification has been prepared in accordance with the New Mexico Administrative Code, Title 20, Chapter 4, Part 1 (20.4.1.900 NMAC) [incorporating Code of Federal Regulations (CFR), Title 40 § 270.42], revised March 1, 2009. The modification addresses the potential schedule of corrective actions rather than the scope. Therefore, this modification meets the requirements set forth in 40 CFR, §270.42 Appendix I, Item A.5 and is hereby being submitted as a Class 1 modification requiring prior approval by the NMED-HWB.

The permit modification request includes this letter and an enclosure containing a description of the proposed permit modification, text edits of Table K-1 (Attachment 1 of the Enclosure 1) and figures depicting the specific change to the SWMU boundaries (Attachment 2 of Enclosure 1). Accordingly, a signed certification page is also included (Attachment 3 of the Enclosure 1). Three hardcopies and one electronic copy of this submittal will be delivered to the NMED-HWB.

If you have comments or questions regarding this permit modification, please contact Cheryl Rodriguez at (505) 665-5330 or Mark Haagenstad at (505) 665-2014.

Sincerely,

Sincerely,



John C. Bretzke
Division Leader
Environmental Protection & Compliance Division
Los Alamos National Security LLC



David S. Rhodes
Director, Office of Quality & Regulatory Compliance
Environmental Management
Los Alamos Field Office

JCB:DSR:MPH/TD:lm

Enclosures 1: Class 1 Permit Modification Description and Figures

Cy: Laurie King, USEPA/Region 6, Dallas, TX, (E-File)
Shelly Lemon, NMED/SWQB, Santa Fe, NM, (E-File)
Neelam Dhawan, NMED/HWB, Santa Fe, NM, (E-File)
Siona Briley, NMED/HWB, Santa Fe, NM, (E-File)
Stephen M. Yanicak, NMED/DOE/OB, (E-File)
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Cy (continued):

Douglas E. Hintze, EM-LA, (E-File)
David S. Rhodes, EM-LA, (E-File)
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ENCLOSURE 1

**CLASS 1 PERMIT MODIFICATION DESCRIPTION, PERMIT CHANGES AND
FIGURE UPDATES**

Proposed Permit Modification Summary

Solid Waste Management Units (SWMUs) 01-001(d), 01-001(s), 01-002(a)-00 and 01-006(h) and AOC 01-003(b) are currently listed in Attachment K, Table K-1 of the Los Alamos National Laboratory Hazardous Waste Facility Permit (the Permit). These sites are each currently located on property owned by more than one entity. The Permittees propose to split these 5 sites into 12 newly-designated sites based on property ownership. The newly-designated sites will consist of those portions of the existing sites located exclusively on: 1) the privately-owned former Los Alamos Inn property; 2) other privately-owned property; or 3) DOE property. The proposed changes to Table K-1 are shown in redline in Attachment 1 and Figure 1 in Attachment 2 of this permit modification request.

Rationale for Proposed Modification

SWMUs 01-001(d), 01-001(s), 01-002(a)-00 and 01-006(h) and AOC 01-003(b) each encompass the privately-owned property designated as Parcel ID 1033112480275 (former Los Alamos Inn property), as well as property owned by other private entities and/or DOE. The former Los Alamos Inn property is currently for sale for commercial development; however, sale and commercial development of this property is contingent upon receipt of Certificates of Completion (CoCs) under the June 2016 Compliance Order on Consent (Consent Order). To facilitate receipt of CoCs, the Permittees have expedited corrective actions at the portions of the SWMUs and AOC located on the former Los Alamos Inn property.

An investigation report is being prepared for these specific sites and will be submitted to NMED for review and approval. Upon approval of the Los Alamos Inn property investigation report, CoCs will be requested from NMED. Completion of corrective actions at the newly designated SWMUs and AOCs located on DOE property or other private property will be documented in the Upper Los Alamos Canyon Aggregate Area Phase II Investigation Report.

Corrective actions on the other-privately-owned and DOE-owned portions cannot be completed on a schedule consistent with the schedule for the sale and commercial development. Because the SWMUs and AOC are identified as single sites in Table K-1, corrective actions for each site must be completed before a CoC can be requested for that site. To facilitate the schedule for commercial development, the Permittees are proposing to modify Table K-1 to identify the former Los Alamos Inn property-owned, other privately-owned, and DOE-owned portions of the SWMUs and AOC as separate sites. This modification will allow the Permittees to request CoCs for the former Los Alamos Inn portions of the sites prior to completion of corrective actions on the other privately-owned and DOE-owned portions to allow commercial use development on the portion of the sites for which corrective actions are complete.

This permit modification request addresses the following SWMUs and AOC and the associated newly-designated two or three new SWMUs or AOCs:

- SWMU 01-001(d) (Figure 2)
 - SWMU 01-001(d1) – Former Los Alamos Inn property
 - SWMU 01-001(d2) – Other private property
 - SWMU 01-001(d3) – DOE property
- SWMU 01-001(s) (Figure 3)
 - SWMU 01-001(s1) – Former Los Alamos Inn property
 - SWMU 01-001(s2) – Other private property
- SWMU 01-002(a)-00 (Figure 4)
 - SWMU 01-002(a1)-00 – Former Los Alamos Inn property
 - SWMU 01-002(a2)-00 – Other private property
- SWMU 01-006(h) (Figure 5)
 - SWMU 01-006(h1) – Former Los Alamos Inn property
 - SWMU 01-006(h2) – Other private property
 - SWMU 01-006(h3) – Other private property
- AOC 01-003(b) (Figure 6)
 - AOC 01-003(b1) – Former Los Alamos Inn property
 - AOC 01-003(b2) – DOE property and other private property

The above changes are shown in redline text in Table K-1 of Attachment 1 of this permit modification request. As shown in the figures included in Attachment 2, the boundaries of the existing SWMUs and AOC are identical to the combined boundaries of the newly-designated SWMUs and AOCs (Figures 1–6). Corrective actions for the newly-designated SWMUs and AOCs located on property owned by DOE and other private owners will continue to be subject to the provisions of the Consent Order. Therefore, the proposed modification will continue to ensure that all potential contamination associated with the sites is addressed and would not reduce the protection of public health and the environment.

ATTACHMENT 1
REDLINE OF TABLE K-1

Table K-1

SWMUs and AOCs Requiring Corrective Action

AOC	C-00-011	Pajarito Canyon
AOC	C-00-012	Three Mile Canyon
AOC	C-00-013	Potrillo Canyon
AOC	C-00-014	Canon de Valle Canyon
AOC	C-00-015	Fence Canyon
AOC	C-00-016	Water Canyon
AOC	C-00-017	Indio Canyon
AOC	C-00-018	Ancho Canyon
AOC	C-00-019	Chaquehui Canyon
AOC	C-00-020	Mortar impact area
AOC	C-00-021	DP Canyon
AOC	C-00-037	Landfill, Bandelier, NM
AOC	C-00-038	Surface Disposal, Bandelier, NM
AOC	C-00-041	Asphalt and tar remnant site
AOC	C-00-042	Former Underground Storage Tank
AOC	C-00-043	Former Manhole
AOC	C-00-044	Soil contamination
TA-1		
SWMU	01-001(a)	Septic Tank 134
SWMU	01-001(b)	Septic Tank 135
SWMU	01-001(c)	Septic Tank 137
SWMU	01-001(d1)	Soil contamination from Septic Tank 138
SWMU	01-001(d2)	Soil contamination from Septic Tank 138
SWMU	01-001(d3)	Soil contamination from Septic Tank 138
SWMU	01-001(e)	Septic Tank 139
SWMU	01-001(f)	Septic Tank 140(hillside)
SWMU	01-001(g)	Septic Tank 141
SWMU	01-001(o)	Waste Line
SWMU	01-001(s1)	Waste Line
SWMU	01-001(s2)	Waste Line
SWMU	01-001(t)	Waste Line
SWMU	01-001(u)	Waste Lines
SWMU	01-002(a1)-00	Waste Lines
SWMU	01-002(a2)-00	Waste Lines
SWMU	01-002(b)-00	Outfall associated with TA-01 (Located in former TA-45)
SWMU	01-003(a)	Landfill
AOC	01-003(b1)	Surface Disposal Site
AOC	01-003(b2)	Surface Disposal Site
AOC	01-003(c)	Surface Disposal Site
SWMU	01-003(d)	Surface Disposal Site
SWMU	01-003(e)	Surface Disposal Site
SWMU	01-006(a)	Drainline and Outfall
SWMU	01-006(b)	Drainline and Outfall
SWMU	01-006(c)	Drainlines and Outfall
SWMU	01-006(d)	Drainline and Outfall
AOC	01-006(e)	Drainlines and Outfall
AOC	01-006(g)	Storm drains and outfalls
SWMU	01-006(h1)	Storm drain and outfall

Table K-1

SWMUs and AOCs Requiring Corrective Action

SWMU	01-006(h2)	Storm drain and outfall
SWMU	01-006(h3)	Storm drain and outfall
SWMU	01-006(n)	Storm drain and outfall
SWMU	01-006(o)	Storm drains and outfalls
SWMU	01-007(a)	Soil contamination associated with TA-1 Buildings and Structures
SWMU	01-007(b)	Soil contamination associated with TA-1 Buildings and Structures
SWMU	01-007(c)	Soil contamination associated with TA-1 Buildings and Structures
SWMU	01-007(d)	Soil contamination associated with TA-1 Buildings and Structures
SWMU	01-007(e)	Soil contamination associated with TA-1 Buildings and Structures
SWMU	01-007(j)	Soil contamination associated with TA-1 Buildings and Structures
AOC	01-007(k)	Soil Contamination Area
SWMU	01-007(l)	Soil contamination associated with TA-1 Buildings and Structures
TA-2		
AOC	02-003(a)	Soil contamination associated with former valve house and gaseous effluent line
AOC	02-003(b)	Soil contamination associated with former condensate trap
AOC	02-003(c)	Soil contamination associated with former delay system
AOC	02-003(d)	Soil contamination associated with former gaseous effluent line
AOC	02-003(e)	Soil contamination associated with former holding tank (near water boiler reactor)
AOC	02-004(a)	Former Omega West reactor facility
AOC	02-004(b)	Former Reactor facility effluent storage tank TA-2-54
AOC	02-004(c)	Former Reactor facility effluent storage tank TA-2-55
AOC	02-004(d)	Former Reactor facility effluent storage tank TA-2-56
AOC	02-004(e)	Former Reactor facility acid pit TA-2-53
AOC	02-004(f)	Former Reactor facility equipment building
AOC	02-004(g)	Soil contamination associated with former aboveground tank
SWMU	02-005	Soil contamination from Drift loss, cooling tower blowdown
SWMU	02-006(a)	Former French drain
SWMU	02-006(b)	Former Acid waste line
AOC	02-006(c)	Former Drainline
AOC	02-006(d)	Drainline
AOC	02-006(e)	Former sump
SWMU	02-007	Soil contamination from former septic system
SWMU	02-008(a)	Outfall from Structure 02-49
AOC	02-008(c)	Outfall from Building 2-1
SWMU	02-009(a)	Soil contamination associated with former water boiler reactor
SWMU	02-009(b)	Soil contamination associated with former water boiler reactor
SWMU	02-009(c)	Soil contamination associated with condensate trap and leachfield
AOC	02-009(d)	Soil contamination
AOC	02-009(e)	Soil contamination (duplicate of SWMU 02-009(c))
AOC	02-010	Soil contamination associated with former chemical stack 2-3
AOC	02-011(a)	Storm drains associated with former Building 2-1
AOC	02-011(b)	Former drains
AOC	02-011(c)	Storm drain
AOC	02-011(d)	Outfall from Building 2-44

ATTACHMENT 2

FIGURES

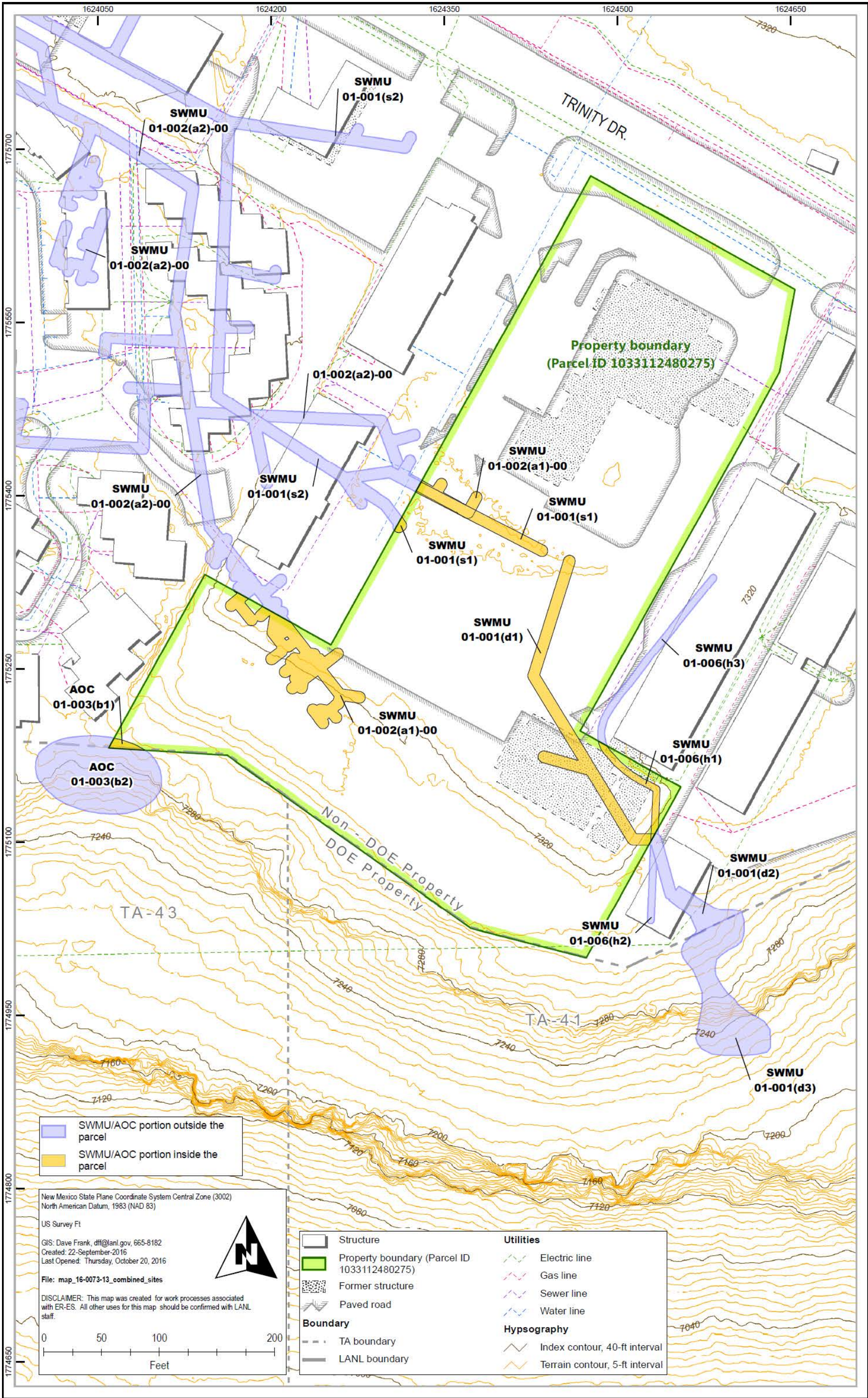


Figure 1. Overview of proposed new SWMUs and AOCs

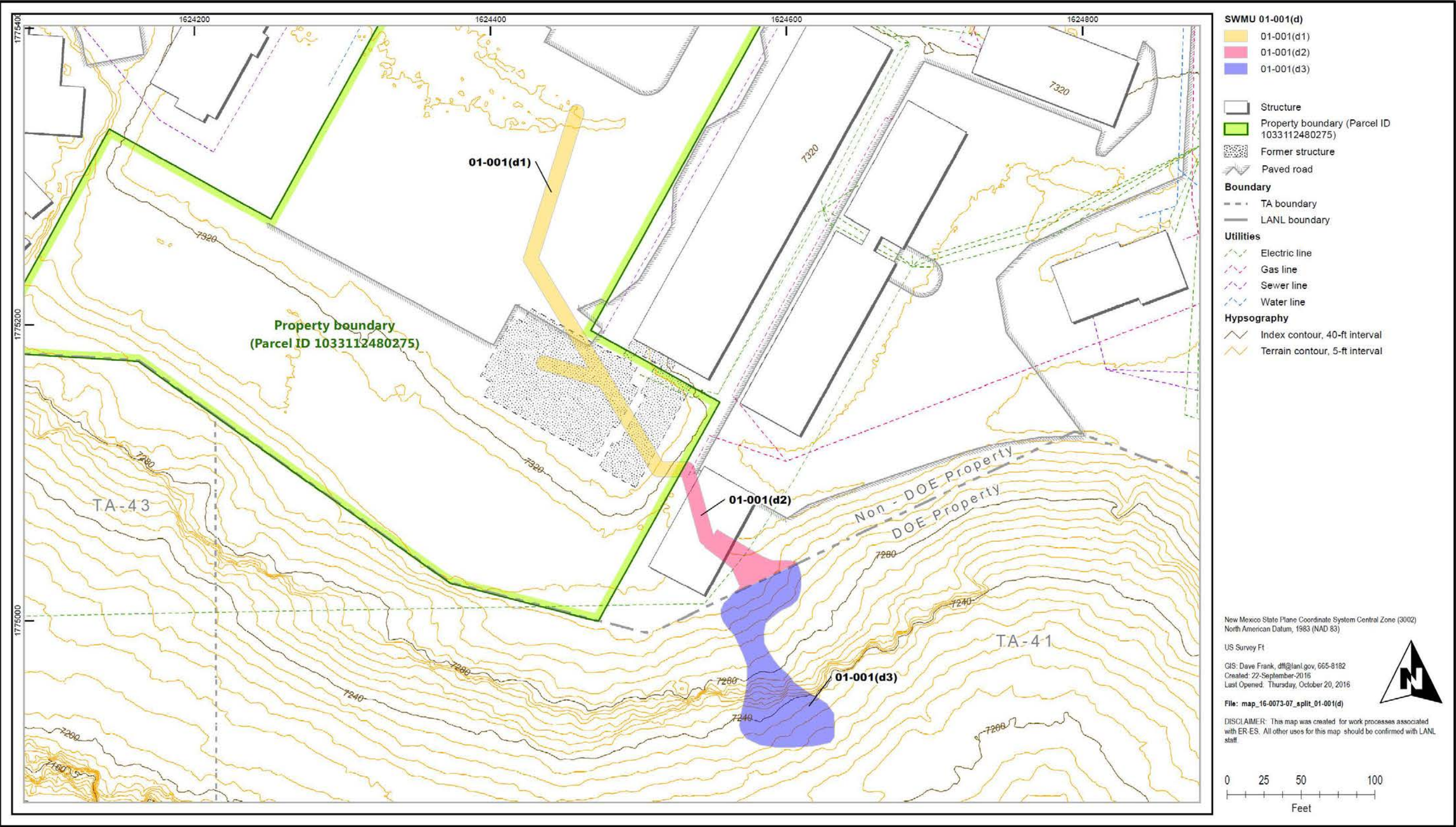


Figure 2. Proposed new SWMUs 01-001(d1), 01-001(d2), and 01-001(d3)

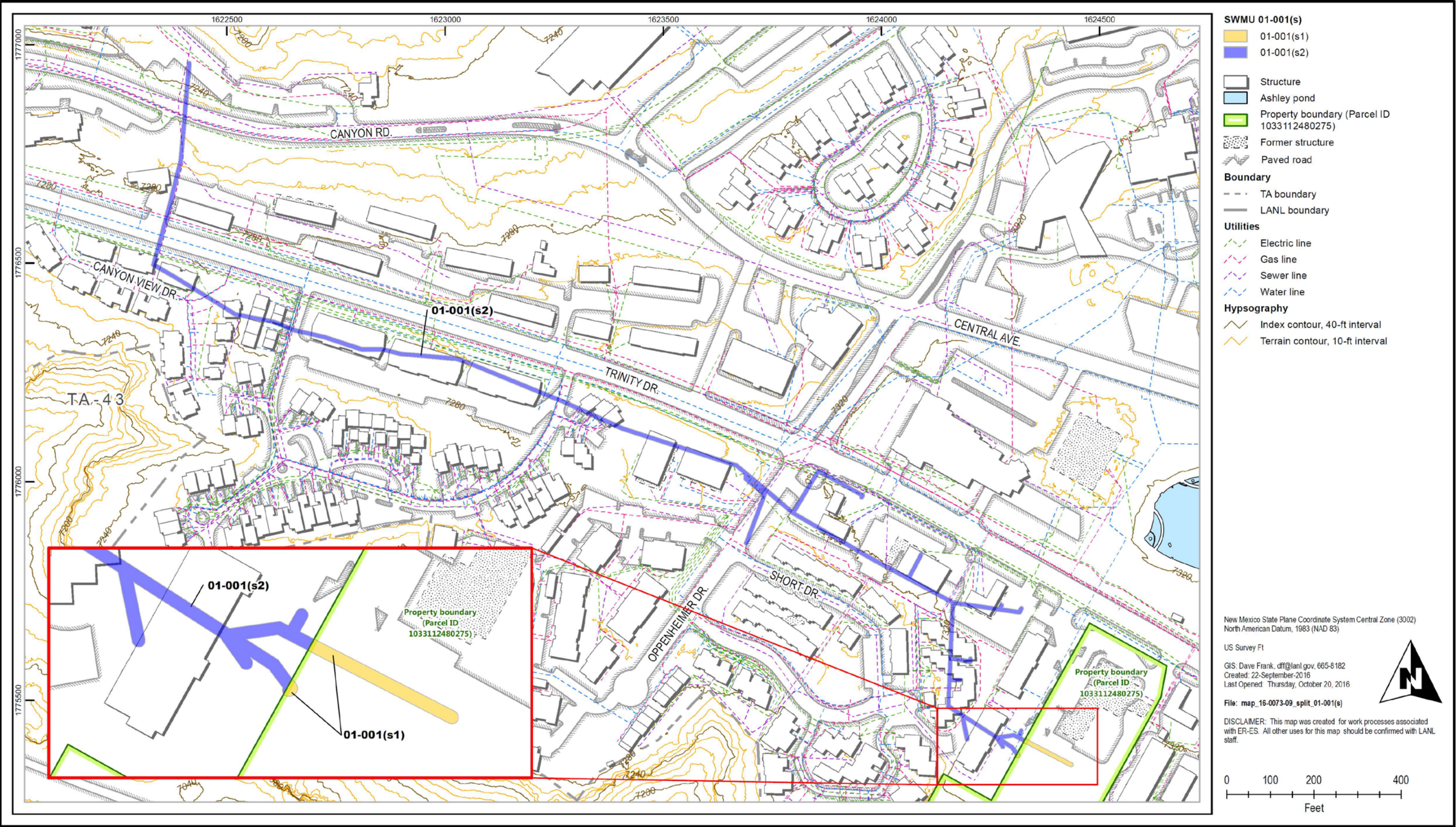


Figure 3. Proposed new SWMUs 01-001(s1) and 01-001(s2)

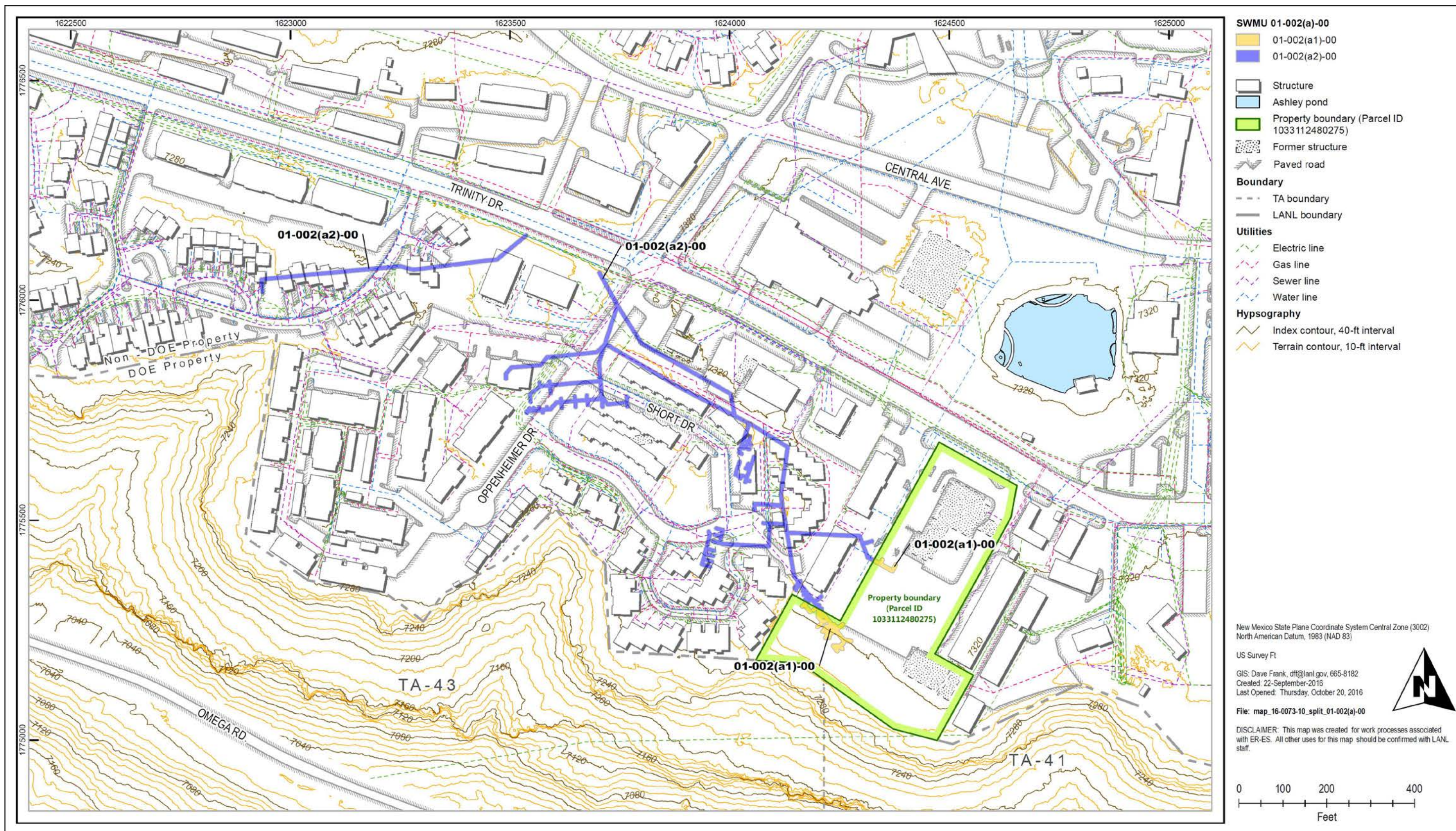


Figure 4. Proposed new SWMUs 01-002(a1)-00 and 01-002(a2)-00

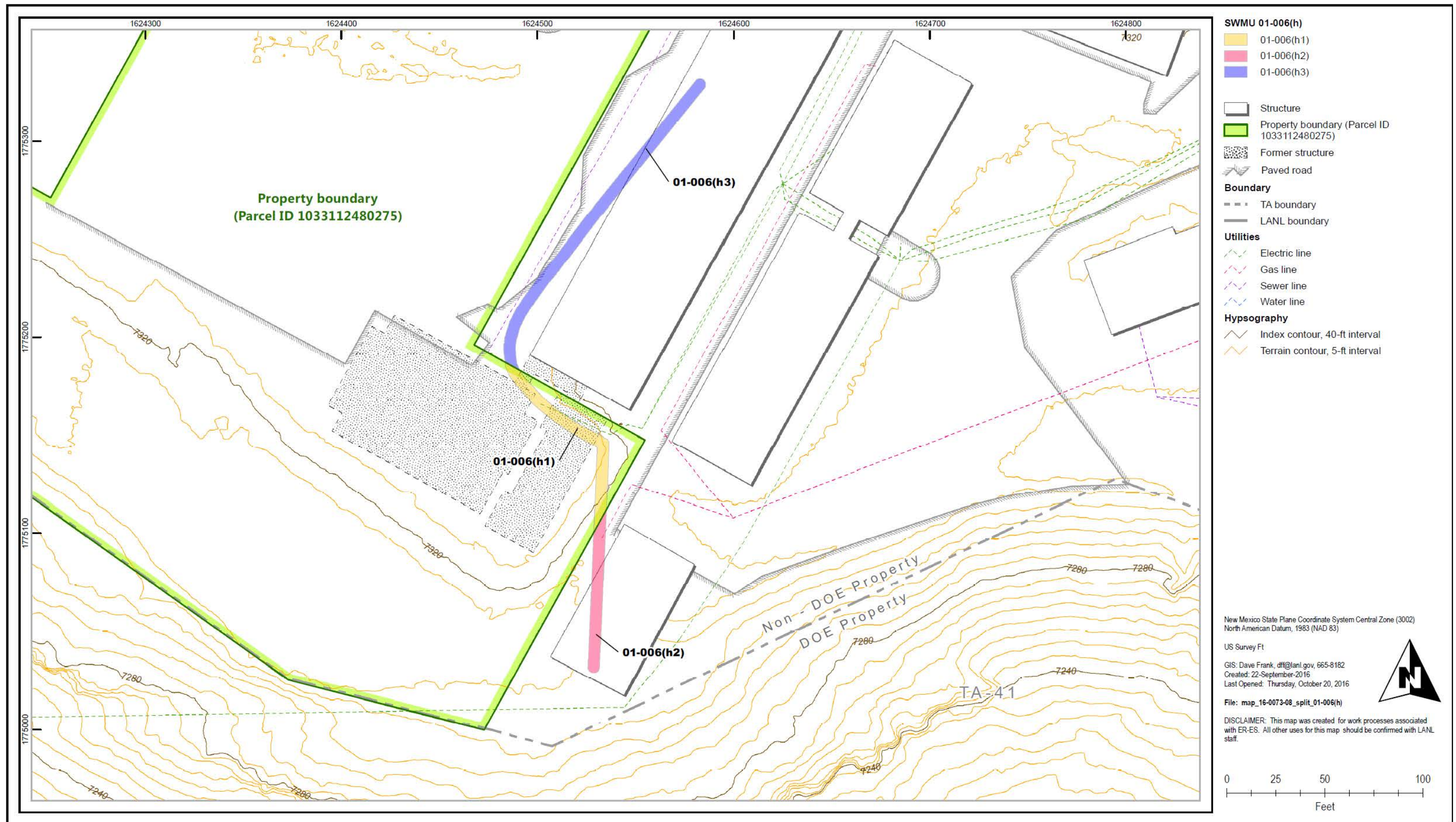


Figure 5. Proposed new SWMUs 01-006(h1), 01-006(h2), and 01-006(h3)

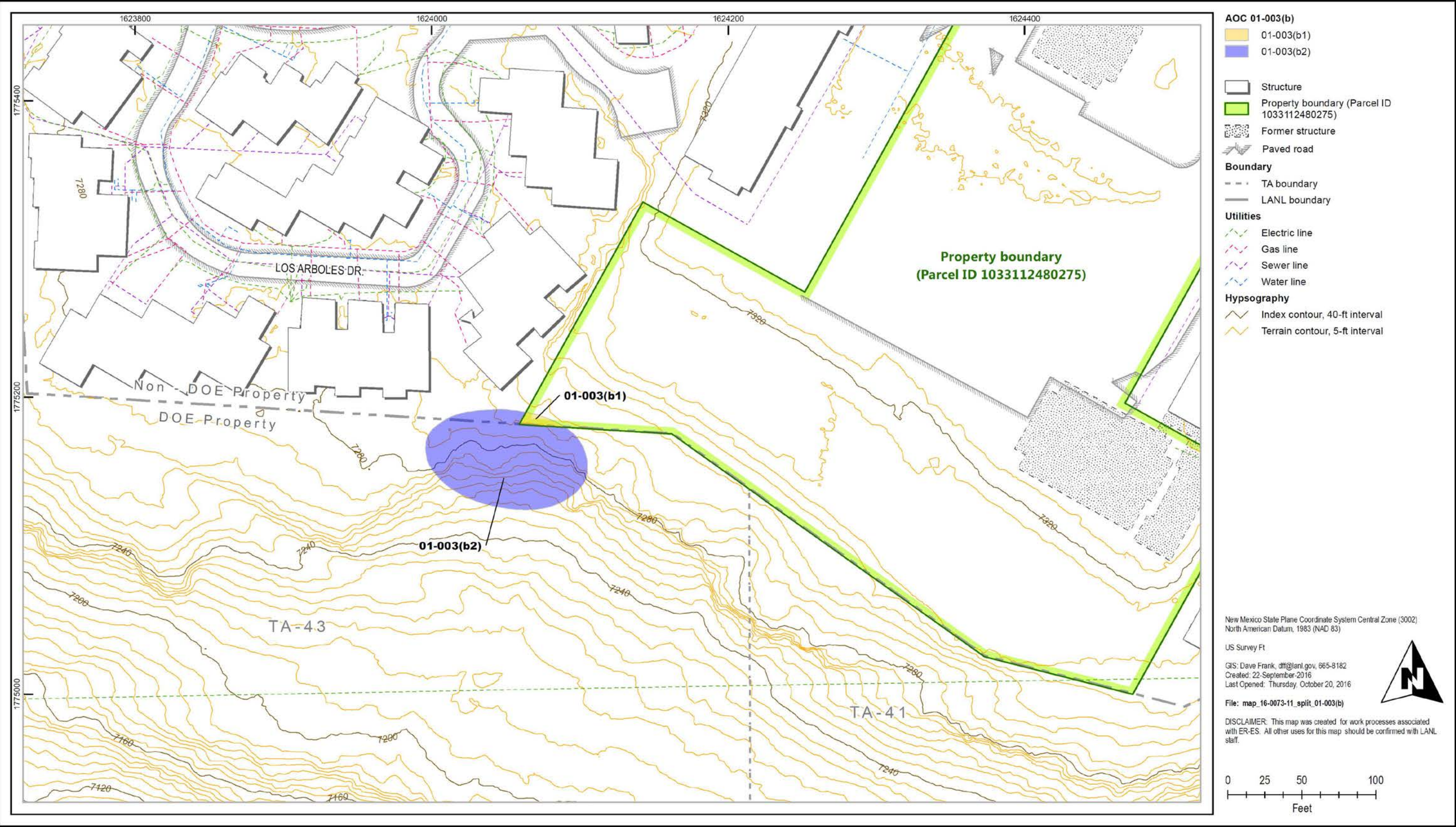


Figure 6. Proposed new AOCs 01-003(b1) and 01-003(b2)