

54



Environmental Protection & Compliance Division
Los Alamos National Laboratory
 PO Box 1663, K491
 Los Alamos, New Mexico 87545
 (505) 667-2211



Environmental Management
Los Alamos Field Office
 1900 Diamond Drive, M984
 Los Alamos, New Mexico, 87544
 (505) 665-5820/Fax (505) 665-5903



Date: AUG 01 2017
Symbol: EPC-DO: 17-283
LA-UR: 17-25530
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

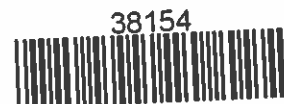
SUBJECT: Transmittal of Class 1 Permit Modification Request to Include Dome 224 within the Los Alamos National Laboratory Hazardous Waste Facility Permit

Dear Mr. Kieling:

The purpose of this letter is to submit a Class 1 permit modification request to include a structure within the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit issued to the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), collectively the Permittees, in November 2010. Removal of the structure was included in a previous permit modification request (EPC-DO-16-288), and was approved on January 20, 2017 (HWB-LANL-16-050). The permit modification request provides proposed revisions to Permit Part 3 and Permit Attachments A, D, E, G.8, G.9, J, and N.

As required by Permit Section 3.1(3), this permit modification request has been prepared in accordance with the Code of Federal Regulations, Title 40 (40 CFR) § 270.42(a)(2) as a permit modification requiring prior approval from the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB). This Class 1 permit modification request consists solely of changes associated with the re-inclusion of Dome 224 to a permitted unit and administrative changes associated with the previous removal in accordance with 40 CFR § 270.42, Appendix I, Item A.1. The Permittees have determined that the structure (Dome 224) will not be removed from the permitted unit at Technical Area 54, Area G, Pad 5 at this time; therefore, the structure designation must be returned within the figures of the unit. Permit Section 3.1(3) requires that all figures accurately reflect the location of all buildings and structures, regardless of whether they manage hazardous waste.

Included in this permit modification request package is the transmittal letter, a signed certification page, and an enclosure that provides a description of the proposed changes and pages of revised text and/or figures from Permit Part 3 and Permit Attachments A, D, E, G.8, G.9, J, and N.



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 the entire Permit Part or Permit Attachment. The electronic copy, provided only to the NMED-HWB, contains a reproduction of the hardcopy in portable document format (pdf) along with all the word processing files used to create the hardcopy.


Upon approval by the NMED-HWB, this permit modification 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 approval of this permit modification request. If you have comments/questions or would like to meet regarding this submittal, please contact Mark P. Haagenstad, LANS, at (505) 665-2014 or David S. Rhodes, Environmental Management Los Alamos Field Office, at (505) 665-5325.

Sincerely,



John C. Bretzke
Division Leader

Sincerely,



David S. Rhodes
Director, Office of Quality & Regulatory Compliance

JCB/DSR/MPH: am

Enclosures 1: Class 1 Permit Modification Request to Include Dome 224 at Technical Area 54, Area G, Pad 5 within the Los Alamos National Laboratory Hazardous Waste Facility Permit

Copy: Laurie King, USEPA/Region 6, Dallas, TX (E-File)
Butch Tongate, NMED, Santa Fe, NM, (E-File)
J. C. Borrego, NMED, Santa Fe, NM, (E-File)
Neelam Dhawan, NMED/HWB, Santa Fe, NM, (E-File)
Siona Briley, NMED/HWB, Santa Fe, NM, (E-File)
David J. Nickless, EM-WM, (E-File)
Douglas E. Hintze, EM-LA, (E-File)
Kimberly Davis Lebak, NA-LA, (E-File)
Peter Maggiore, NA-LA, (E-File)
Jody M. Pugh, NA-LA, (E-File)
Adrienne Nash, NA-LA, (E-File)
Karen E. Armijo, NA-LA, (E-File)
Jordan Arnsward, NA-LA, (E-File)
Darlene S. Rodriguez, NA-LA, (E-File)
Craig S. Leasure, PADOPS, (E-File)
William R. Mairson, PADOPS, (E-File)
Michael T. Brandt, ADESH, (E-File)
Raeanna Sharp-Geiger, ADESH, (E-File)
Randall M. Erickson, ADEM, (E-File)

Copy:

Enrique Torres, ADEM, (E-File)
David J. Funk, ADEM, (E-File)
Andrew R. Baumer, ADEM-PDO, (E-File)
Cheryl D. Cabbil, ADNHHO, (E-File)
Leslie K. Sonnenberg, EWMO-DO, (E-File)
Stephanie Q. Griego, EWMO-DO, (E-File)
Davis V. Christensen, WD-SRS, (E-File)
Kenneth M. Hargis, WD-WPE, (E-File)
David E. Frederici, WD-WPE, (E-File)
Mark P. Haagenstad, EPC-CP, (E-File)
Ellena I. Martinez, EPC-CP, (E-File)
Victoria R. Baca, DESHS-EWMS (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
emla.docs@em.doe.gov, (E-File)
locatsteam@lanl.gov, (E-File)
epc-correspondence@lanl.gov, (E-File)
adesh-records@lanl.gov, (E-File)
rcra-prr@lanl.gov, (E-File)

ENCLOSURE 1

**Class 1 Permit Modification Request to Include Dome 224 at
Technical Area 54, Area G, Pad 5 within the Los Alamos
National Laboratory Hazardous Waste Facility Permit**

EPC-DO: 17-283

LA-UR-17-25530

Date: AUG 01 2017

Class 1 Permit Modification Request to Include a Structure at Technical Area 54, Area G, Pad 5

This document consists of a Class 1 permit modification request for the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit) issued to the Department of Energy and the Los Alamos National Security, LLC, collectively known as the Permittees, in November 2010 (EPA ID # NM0890010515). All proposed revisions are included in Attachment 1 with red editing marks to indicate changes within Permit Part 3, as well as Permit Attachments A, D, E, G.8, G.9, and J. These changes, as well as the replacement figures for Attachments G.8, G.9 and N, are provided in this modification. A signed certification, as required by Title 40 of the Code of Federal Regulations (40 CFR) § 270.11, is provided in Attachment 2.

Description

The purpose of this modification submittal is to describe the re-inclusion of a structure (Dome 224) at a permitted unit located at Technical Area (TA) 54. The removal of Dome 224 was proposed and approved in a previous permit modification (*See* EPC-DO-16-288 and HWB-LANL-16-050); however, the Permittees have determined that removal of Dome 224 will not occur this fiscal year. All work within the area was paused while an appraisal of the potential for a safety situation elsewhere at the permitted unit was performed. Although evaluations associated with prohibiting the waste containers located at TA-54, Area G, Pad 5 to exposure from work-related energy sources and ensuring all personnel are out of range in the event a hazard occurs are complete, the Permittees continue to evaluate options for future management. Dome 224 will not be decommissioned until a path forward for the waste containers is determined, and the Permit must be changed to include the structure so that the figures in Attachments G and N of the Permit accurately reflect all structures located at the unit.

Basis

This modification has been prepared in accordance with 40 CFR § 270.42(a)(2) as required by Permit Section 3.1(3). The permit condition at Permit Section 3.1(3) requires that buildings or structures located at permitted units be accurately reflected within the figures in Attachments G and N of the Permit. Proposed changes to figures and text reflect the Dome 224 location at the permitted unit, the addition of permit conditions specific to operations and maintenance of the dome, and the location of emergency equipment within the dome. Additionally, the request includes other administrative changes associated with the addition of Dome 224 back into the Permit in accordance with 40 CFR § 270.42, Appendix I, Item A.1.

Discussion of Changes

Proposed permit changes are described below and the applicable changes are shown within Attachment 1 of this document with red editing marks to indicate changes.

Permit Part 3, *Storage in Containers*

Changes include the re-addition of permit conditions and a Permit Section associated specifically with the sump in Dome 224 (Permit Section 3.12.1(1), *Area G* and Permit Section 3.12.3.7, *Dome 224*) because the permit conditions continue to be applicable for the dome. The conditions concern removal of liquids from the sump within 24 hours of discovery and provide the requirement that secondary containment pallets be used for storage of containers with liquids in the dome.

Attachment A, *Technical Area (TA) – Unit Descriptions*

Language descriptive of Dome 224 as a structure used for storage of hazardous waste was added to Section A.4.2.5, *Pad 5*.

Attachment D, *Contingency Plan*

“TA-54-224” was added to the list of locations of emergency equipment within Table D-2, *TA-54 Area G, Emergency Equipment*.

Attachment E, *Inspection Plan*

A note specific for the inspections conducted at Dome 224 was added to the Inspection Record Form instructions in the description of Item #15 of the form.

Attachment G.8, *Technical Area 54, Area G, Pad 5 Outdoor Container Storage Unit Closure Plan*

Proposed changes revert to the language within the closure plan as it was prior to the request for removal of the dome from the permitted unit. The description of the dome within Section 2.0, *Description of Unit to be Closed*, was changed to present tense and additions were included in Section 6.1, *Soil Sampling and Decontamination Verification Sampling Activities*. None of the required sample locations have been changed from the approved closure plan, and the Dome 224 footprint has been included on Figure G.8.1: *Technical Area 54, Area G, Pad 5, Outdoor Containers Storage Unit Soil Sampling Grid and Additional Sampling Locations*.

Attachment G.9, *Technical Area 54, Area G, Pad 6 Outdoor Container Storage Unit Closure Plan*

Figure G.9-1: *Technical Area 54, Area G, Pad 6 Outdoor Container Storage Unit Sampling Grid and Additional Sampling Locations* has been revised to include Dome 224 at Technical Area 54, Area G, Pad 5.

Attachment J, *Hazardous Waste Management Units*

The proposed revision to Table J-1, *Active Portion of the Facility*, includes Dome 224 on TA-54, Area G, Pad 5.

Attachment N, *Figures*

Figure 8: *Technical Area 54, Area G, Security Fences, Entry Gates, and Entry Stations*; Figure 27: *Technical Area 54, Area G, Container Storage Units*; and Figure 33: *Technical Area (TA)-54, Area G, Pad 6, (Domes 153 & 283)* were revised to include Dome 224. Also, Figure 32 within Attachment N was revised to include the Dome 224 structure on the permitted unit and the title of the figure was changed to “Figure 32: Technical Area (TA)-54, Area G, Pad 5 (Domes 49 and 224; and Storage Sheds 114, 145, 146, 177, 1027, 1028, 1030, and 1041)”.

Attachment 1

Text Changes and Replacement Figures for Permit Part 3 and Permit Attachments A, D, E, G.8, G.9, J, and N

3.1	GENERAL CONDITIONS	63
3.2	CONDITION OF CONTAINERS	63
3.3	ACCEPTABLE STORAGE CONTAINERS	64
3.4	COMPATIBILITY OF WASTE WITH CONTAINERS	64
3.5	MANAGEMENT OF CONTAINERS	64
3.5.1	Storage Configuration and Minimum Aisle Space	65
3.6	WASTE CONTAINER LABELING	65
3.7	CONTAINMENT SYSTEMS	65
3.7.1	Containers with Free Liquids	66
3.7.2	Containers without Free Liquids	67
3.8	INSPECTION SCHEDULES AND PROCEDURES	67
3.9	VOLATILE ORGANIC AIR EMISSIONS	68
3.10	TA-3 CONTAINER STORAGE REQUIREMENTS	69
3.10.1	General Operating Conditions	69
3.10.2	Secondary Containment	69
3.11	TA-50 CONTAINER STORAGE REQUIREMENTS	69
3.11.1	General Operating Conditions	69
3.11.2	Preventing Hazards in Loading/Unloading	69
3.11.3	Preventing Run-on	69
3.12	TA-54 CONTAINER STORAGE REQUIREMENTS	70
3.12.1	General Operating Conditions	70
3.12.2	Preventing Run-on and Run-off	71
3.12.2.1	Domes 153 & 283	71
3.12.2.2	Storage Shed 8	71
3.12.2.3	TA-54-33	71
3.12.3	Secondary Containment	71
3.12.3.1	TA-54-32	71
3.12.3.2	TA-54-35	71
3.12.3.3	TA-54-36	72
3.12.3.4	TA-54-58	72
3.12.3.5	TA-54-39 and Containment Pad	72
3.12.3.6	Storage Sheds 144, 145, 146, and 177	72
3.12.3.7	Dome 224	72
3.13	TA-55 CONTAINER STORAGE REQUIREMENTS	73
3.13.1	General Operating Conditions	73
3.14	TA-63 CONTAINER STORAGE REQUIREMENTS	73
3.14.1	General Operating Conditions	73
3.14.2	Retention Basin	75
3.14.3	Subsurface Vapor Monitoring	77
PART 4: TA-55 STORAGE IN TANKS AND TREATMENT BY STABILIZATION		83
4.1	GENERAL CONDITIONS	83
4.2	EXISTING TANK SYSTEM INTEGRITY	83

3.12 TA-54 CONTAINER STORAGE REQUIREMENTS

3.12.1 General Operating Conditions

The Permittees shall ensure that storage of hazardous waste in containers at TA-54 occurs only in the permitted unit at Area L, the nine permitted units at Area G, the two permitted units at TA-54 West, and as identified in Attachment A (*Technical Area Unit Descriptions*) and Attachment J (*Hazardous Waste Management Units*).

Area G

(1) The Permittees shall remove all fluids above the HDPE liner at Area G, Dome 224 within 24 hours of discovery (see 40 CFR § 270.32(b)(2)). The Permittees shall include a record of the evacuation in the Facility's Operating Record including a complete chemical analysis of the fluid.

(+2) The Permittees shall ensure that at Area G, all containers storing hazardous waste with free liquids are stored on secondary containment pallets, except inside the following structures: Domes 230, and Sheds 144, 145, 146, 177, 1027, 1028, 1029, and 1041.

Area L

(1) The 10,000 gallon holding tank at Area L, Dome 215 shall be inspected monthly and any detected fluids shall be characterized and removed within 3 days. The Permittees shall include a record of all holding tank inspections and evacuations in the Facility's Operating Record, including a complete chemical analysis of the tank contents (see 40 CFR § 270.32(b)(2)).

(2) The Permittees shall ensure that at Area L, all containers storing hazardous waste with free liquids are stored on secondary containment pallets, except when inside the following structures: Sheds 31, 68, 69, 70; concrete pad with canopy TA-54-32; concrete pads TA-54-35, TA-54-36, TA-54-58; and building TA-54-39 (Room 101 and South Containment Pad).

TA-54 West

The Permittees may store mixed TRU wastes in sealed Nuclear Regulatory Commission (NRC) certified Type-B shipping containers at the TA-54 West Outdoor permitted unit without secondary containment and weather protection.

The Permittees may use the Outdoor Pad excess storage capacity listed in Attachment J, Table J-1, only as specified in Permit Attachment A, Section A.4.3.2 (see 40 CFR § 270.32(b)(2)).

3.12.3.3 TA-54-36

The Permittees shall treat the concrete berms and the base of the concrete pad with chemical-resistant epoxy filler-sealer and protective coating, providing an impervious seal to contain any potential leaks, spills, or accumulation of precipitation. The Permittees shall maintain the chemical-resistant epoxy and protective coating in accordance with Permit Section 3.7.1 and the manufacturer's specifications.

3.12.3.4 TA-54-58

The Permittees shall treat the concrete berms and the base of the concrete pad with chemical-resistant epoxy filler-sealer and protective coating, providing an impervious seal to contain any potential leaks, spills, or accumulation of precipitation. The Permittees shall maintain the chemical-resistant epoxy and protective coating in accordance with Permit Section 3.7.1 and the manufacturer's specifications.

3.12.3.5 TA-54-39 and Containment Pad

3.12.3.5.i Room 101

The Permittees shall treat the curb and floor of this 878 square foot room with chemical-resistant epoxy filler-sealer and protective coating, providing an impervious seal to contain any potential leaks, spills, or accumulation of precipitation. The Permittees shall maintain the chemical-resistant epoxy and protective coating in accordance with Permit Section 3.7.1 and the manufacturer's specifications.

3.12.3.5.ii Containment Pad

The Permittees shall treat the concrete floor and curb with chemical-resistant epoxy filler-sealer and protective coating, providing an impervious seal to contain any potential leaks, spills, or accumulation of precipitation. The Permittees shall maintain the chemical-resistant epoxy and protective coating in accordance with Permit Section 3.7.1 and the manufacturer's specifications.

3.12.3.6 Storage Sheds 144, 145, 146, and 177

The Permittees shall ensure the interior of each shed and sump is treated with chemically-resistant epoxy paint. The Permittees shall maintain the chemically-resistant epoxy paint in accordance with Permit Section 3.7.1 of this Permit Part and the manufacturer's specifications.

3.12.3.7 Dome 224

The Permittees shall not rely on the engineered high-density polyethylene (HDPE) liner in Dome 224 as a method of secondary containment and shall instead store all hazardous waste containers holding free liquids on secondary containment pallets.

ATTACHMENT A
TECHNICAL AREA (TA) - UNIT DESCRIPTIONS

Pad 10 asphalt

Pad 10 is primarily used for storage of feed stock and empty drums for the transuranic waste characterization activities. Additionally, storage of oversized mixed wastes in transportainers and metal boxes can occur on the pad.

A.4.2.5 Pad 5

This asphalt pad consists of former pads 5, 7, and 8, located on the south-central portion of Area G, has one dome and eight sheds (*see Figure 32 in Attachment N (Figures)*) associated with it. Former Pad 5 is approximately 500 feet long, 65 feet-wide, and 4 inches thick. It is sloped approximately 2% from north to south. Former Pad 8 is approximately 150 feet long, 95 feet-wide, and 3 inches thick. It is sloped approximately 1% from west to east. Former Pad 7 is approximately 200 feet long, 64 feet-wide, and 4 inches thick. It is sloped approximately 1% from west to east.

Dome 49

Storage dome 49, located on former Pad 5, is 440 feet long and 60 feet wide and has a peak height of approximately 26 feet (*see Figure 32 in Attachment N (Figures)*). The design and materials of construction for Dome 49 are the same as the other domes at TA-54. The dome is equipped with a double-panel rolling door at the north end of the dome and six personnel doors to allow for adequate access both by vehicles and by personnel. The interior perimeter of the dome is surrounded by a 6-inch-high, 8-inch-wide asphalt curb which helps prevent run-on into and runoff from the dome. An asphalt ramp located at the vehicle entrance to Dome 49 allows vehicles and container handling equipment to pass safely over the curb. The dome is anchored to Pad 5 with standard drift pins.

A maintenance gate is located along the fence-line west of Dome 49. The gate is not used for general access to the area, but is used by authorized personnel to access areas outside of the Area G fence-line to clear vegetation necessary to minimize fire hazards. The gate is chain-link and approximately eight feet tall with razor wire on the top. The gate is not equipped with a badge reader and is locked at all times unless used by authorized personnel for maintenance purposes.

Dome 224

Storage Dome 224, located on former pad 8, is approximately 110 feet long and 60 feet wide, with a peak height of 26 feet (*see Figure 32 in Attachment N (Figures)*). The design and materials of construction for dome 224 are the same as other domes at TA-54. This dome is anchored to Pad 8 with anchor bolts. It is equipped with a single-panel roll-up door at the north end and four personnel doors to allow adequate access by vehicles and by personnel. A 1-foot, 8-inch wide by 2-feet, 4-inch deep concrete ring wall surrounds the interior of dome 224. A high-density polyethylene (HDPE) liner exists below the asphaltic pad within the dome.

ATTACHMENT D
CONTINGENCY PLAN

TABLE D-2

TA-54 AREA G

Emergency Equipment

FIRE CONTROL EQUIPMENT

ABC and/or BC rated fire extinguishers are available at TA-54-8, TA-54-33, TA-54-48, TA-54-49, TA-54-153, [TA-54-224](#), TA-54-229, TA-54-230, TA-54-231, TA-54-232, TA-54-283, TA-54-375, and TA-54-412, and on Pads 1, 9 and 10.

Description of General Capabilities:

These portable, manually operated fire extinguishers may be used by any qualified employee in the event of a small fire. For larger fires, the Emergency Operations and Support Center (EOSC) and the Los Alamos Fire Department (LAFD) are alerted.

Flame or smoke detection equipment and fire alarm pull stations are located within structures at TA-54-229, TA-54-230, TA-54-231, and TA-54-232.

Ultra-violet detectors, smoke and audible devices are located within structure TA-54-153.

Dry-chemical fire suppression systems are available at TA-54-1027, TA-54-1028, TA-54-1030, and TA-54-1041.

A dry-pipe fire suppression system is available at TA-54-412.

Fire alarm pull stations are available at TA-54-33, TA-54-48, TA-54-49, TA-54-153, [TA-54-224](#), TA-54-229, TA-54-230, TA-54-231, TA-54-232, TA-54-283, TA-54-375, and TA-54-412.

Description of General Capabilities:

Fire alarms may be activated by any employee in the event of a fire to notify the LAFD and the EOSC. The EOSC and LAFD are also notified upon activation of the flame or smoke detectors.

Several fire hydrants are located in Area G. These fire hydrants will supply water at an adequate volume and pressure to satisfy the requirements of 40 CFR 264.32(d)

SPILL CONTROL EQUIPMENT

Spill control stations and/or portable spill kits are located at TA-54-8, TA-54-33, TA-54-48, TA-54-49, TA-54-153, [TA-54-224](#), TA-54-229, TA-54-230, TA-54-231, TA-54-232, TA-54-283, TA-54-375, and TA-54-412.

Each spill kit generally includes bags of absorbent and an inventory of tools and supplies.

COMMUNICATION EQUIPMENT

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

Emergency paging system- loud speakers located throughout the site.

Evacuation alarm buttons are located at or near TA-54-33, TA-54-48, TA-54-49, TA-54-153, [TA-54-224](#), TA-54-229, TA-54-230, TA-54-231, TA-54-232, TA-54-283, TA-54-375, TA-54-412, Pads 1, 9 and 10 and at various muster stations.

Description of General Capabilities:

Loud speakers, paging telephones equipped with public address capabilities, and alarms located throughout Area G can be used to notify personnel of an emergency. The emergency paging system can also be utilized to alert workers of appropriate response actions. Evacuation alarms have horns mounted on telephone poles throughout Area G that emit an audible alarm that can be heard throughout Area G. Employees can also be notified of an emergency situation and appropriate response action through the use of a text message sent on the emergency alpha-numeric pagers or cellular telephone, or by two-way radio.

DECONTAMINATION EQUIPMENT

Portable eyewash stations are located at permitted units located at TA-54 Area G during waste management operations involving free liquids.

One permanent, hard-plumbed eyewash station and a safety shower is located in TA-54-33.

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

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) being managed should be obtained prior to working with hazardous or mixed waste to determine if the application of water is indicated for decontamination.

PERSONAL PROTECTIVE EQUIPMENT

Personnel at Area G are required to use appropriate personal protective equipment (PPE) to protect themselves from the hazards found in the workplace under normal conditions. This PPE may include gloves, steel-toed shoes, and safety glasses. Additional PPE may be required during an unusual hazardous situation and can be found in the spill kits or at various locations throughout the site.

ATTACHMENT E
INSPECTION PLAN

8. Communication equipment must be inspected in order to ensure availability and proper operating condition for each piece of equipment (e.g., telephones, radios, and alarms). Equipment must be present in accordance with the appropriate contingency plan.
9. Required signs must be legible and prominently posted in accordance with 40 CFR § 264.14(c) and/or the permit as applicable. Warning signs at all gates and perimeter fences where present around permitted units, must be posted in bilingual (In English and Spanish), must be visible from a distance of at least 25 feet and from all angles. Warning signs along shared boundaries with the Facilities permitted unit and the pueblo of San Ildefonso shall be posed in the appropriate dialect of Tewa, equivalent to the bilingual warning signs (See Permit Section 2.5.1 (Warning Signs)). Signs at large outdoor storage areas will be inspected no less than two times per year to evaluate for deterioration.
10. Site security must be verified. Items such as fences, gates, locks, and other access control equipment (as appropriate) should be checked for proper operating condition or mitigative measures (e.g., attendants, locks, prohibited or controlled roadway access). (See Permit Section 2.5 (Security))
11. Roads, process floors, and other work surfaces at TSDs must be inspected for any conditions that could lead to a spill or an accident. Inspection includes structures and base materials and malfunctions, deterioration (e.g., tears in dome fabric), operator errors, and discharges.
12. Hazardous or mixed waste TSDs must have fire control and spill control equipment. Equipment must be present, in proper operating condition, and appropriate for the material in question. Hose bibs, where present, should be inspected for proper operating condition and adequate pressure. Outdoor fire-water supply systems must be checked for freezing and damage. Equipment must be inspected and present in accordance with the appropriate inspection and contingency plans. (Attachment D (contingency Plan) of the Permit includes a list of required equipment specific to each permitted unit.)
13. Where present, eyewashes and safety showers must be inspected to ensure proper operating condition or that scheduled routine inspections have been conducted and documented as indicated at the eyewash or safety shower. Outdoor locations must be checked for freezing.
14. Wind socks, where present at outside TSDs, must be inspected to ensure that they are in proper operating condition/functional and checked for damage.
15. Secondary containment structures for hazardous or mixed waste operations must be inspected to verify proper operating condition and to ensure adequate capacity. Structures must also be inspected for the presence of standing water or hazardous/mixed waste or any other indication of a spill (i.e. discolored vegetation, soil, or concrete). For certain operations, secondary containment includes inspection of gloves, gloveboxes, hoods, and ventilation systems. For locations where inflatable “Porta Berms” are used, inspectors must ensure that they are adequately inflated. All monitoring and leak detection systems must also be checked. (Note: Dome 224 must be checked for liquids even though the liner is not considered secondary containment.)
16. Loading and unloading areas must be inspected daily when in use for signs of damage or deterioration that may lead to an accident or spill. This includes asphalt covered areas and areas where containers or tanks are handled or the contents thereof are transferred, including doorways or entry ways (Permit Section 2.6.1).

ATTACHMENT G.8
TECHNICAL AREA 54, AREA G, PAD 5
OUTDOOR CONTAINER STORAGE UNIT
CLOSURE PLAN

1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at Technical Area (TA)-54, Area G, Pad 5 at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264 Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions to the plan, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8 to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The permitted unit, which measures 850 feet long and 224 feet wide, is located in the western portion of Area G. It is four inches thick, is sloped 1-2%, and is comprised of three asphalt pads (Pad 5 and older Pads 7 and 8). There ~~have been~~ are ten structures associated with the permitted unit: two domes (~~former~~ Domes 224 and Dome 49) and eight sheds (sheds 144, 145, 146, 177, 1027, 1028, 1030, and 1041). Rainwater flow at the permitted unit is directed across the pad by slope and drainage structures (*i.e.*, supplemental check berm, culvert, and sediment traps).

Storage Domes 49 and 224 ~~are~~ is used for the storage of hazardous waste. ~~They are~~ It is built of an aluminum framework of trusses covered with tension-fitted ultraviolet resistant, fire-retardant coated, polyester fabric and ~~is~~ are anchored to the permitted unit with drift pins and anchor bolts.

Dome 49 is 440 ft long and 60 ft wide, and has a peak height of approximately 26 ft. The dome is equipped with a double-panel rolling door at its north end and has six personnel doors to allow for adequate access both by vehicles and by personnel. The interior perimeter of the dome is surrounded by a 6-inch-high, 8-inch-wide asphalt curb, which helps prevent run-on into, and run-off from, the dome.

Dome 224 ~~was used for storage of hazardous waste at the unit. It was~~ is approximately 110 ft long and 60 ft wide, with a peak height of 26 ft and was built of an aluminum framework of trusses covered with tension-fitted ultraviolet resistant, fire-retardant coated, polyester fabric and was anchored to the permitted unit with drift pins and anchor bolts. It ~~was~~ is equipped with a single-panel roll-up door at the north end and four personnel doors to allow adequate access by vehicles and by personnel. A 1-ft, 8-inch wide by 2-ft, 4-inch deep concrete ring wall originally designed for secondary containment of liquids surrounding the interior of Dome 224. The asphalt floor ~~was~~ is sloped 0.5% towards a concrete sump in the center of the dome. The floor, sump, and curbs ~~were~~ are lined with a double layer of HDPE to contain any liquids that might accumulate. ~~The dome, concrete ring wall, and HDPE liners were removed from the permitted unit, demolished, and disposed of in 2017.~~

6.1 Soil Sampling and Decontamination Verification Sampling Activities

Soil sampling and decontamination verification sampling activities will be conducted at the permitted unit in order to verify that soils at the permitted unit, that structures, such as the storage sheds situated on the permitted unit, and equipment related to the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment related to the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from the following areas in each of the eight storage sheds:

- a. every wall;
- b. each floor;
- c. each ceiling; and
- d. each sump.

A total of 56 wipe samples will be collected. If there is liquid found in any of the sumps at the time of sample collection, liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of soil samples at the following locations:

- e. one soil sample in front of each of the storage sheds for a total of eight samples (*see* Permit Section 9.4.7.1.ii(1));
- f. one soil sample every 900 square feet of the permitted unit for a total of 95 samples (*see* Permit Section 9.4.7.1.ii(2));
- f.g. one sample at the sump located in Dome 224 (*see* Permit Section 9.4.7.1.ii(5)); and
- g.h. nine samples to address stormwater runoff (*see* Permit Section 9.4.7.1.ii(3) and discussion below for rationale of sample locations).

Figure G.8-1 illustrates these sampling locations.

~~If there is At the time of removal of Dome 224, a liquid sample was collected from found in the sump in Dome 224 at the time of the assessment, a liquid sample will be collected in accordance with Section 6.2.1 of this closure plan. Additionally, one soil sample was collected at the sump location in Dome 224 (*see* Permit Section 9.4.7.1.ii(5)). Documentation of these samples and analysis are kept as part of the Facility Operating Record and will be reviewed as part of closure of the permitted unit.~~

At the time of sampling, the precise locations of the grid samples will be selected randomly from within each 900 square foot sampling box (*see* Figure G.8-1). These locations will be determined by applying a sub-grid of potential sampling points and randomly choosing one. If the review or assessment determines the need to obtain additional samples within the area of the sampling box (*e.g.*, at asphalt cracks), these sample locations will be in addition to the grid sample locations.

Individual sample locations to address stormwater runoff have been sited by the specific drainage conditions at the permitted unit and are numbered from '1-9' on Figure G.8-1. Sample numbers '1' and '2' are situated to intercept water drainage from former Pad 7; '1' is located at a small supplemental check berm while '2' is at the main culvert draining from former Pad 7. Sample numbers '3', '8', and '9' address drainage from former Pad 8; '3' is located in the area in front of the ~~former location of the~~ main door of Dome 224 while 8 and 9 address the drainage from the rest of former Pad 8 on the east side where it is directed by the slope of that pad. Sample numbers '4', '5', '6', and '7' address the potential discharge points for drainage from the permitted unit (Pad 5) and Dome 49; '4' is located on the north side of the main door of Dome 49, '5' and '6' are situated in sediment traps located in the drainage from the west side of the permitted unit; and '7' is located in a combined drainage area for the east side of the permitted unit and west side of former '7.'

6.2 Sample Collection Procedures

Samples will be collected in accordance with the Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 1986 and EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

6.2.1 Liquid Sampling

Liquids will be collected and analyzed to determine if residual hazardous constituents remain in the sumps in the storage sheds at the permitted unit. Liquid samples will be collected using glass or plastic tubes, a composite liquid waste sampler, a bacon bomb, a bailer, or by pouring liquid into sample containers.

6.2.2 Wipe Sampling

Wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on structures or related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

6.2.3 Soil and Sediment Sampling

Soil and sediment samples will be collected and analyzed to determine if hazardous constituents are present in the soils and sediment at the permitted unit. Samples will be collected using a spade, scoop, auger, trowel, or other equipment as specified in approved methods for the type of analytes (*i.e.*, EPA 1996 or 2002) and from the appropriate depths as directed in Permit Section 9.4.7.1.ii. Samples will be kept at their at-depth temperature or lower, protected from ultraviolet light, sealed tightly in the recommended container, and analyzed within the specific holding times listed in Table G.8-4.

6.2.4 Cleaning of Sampling Equipment

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination

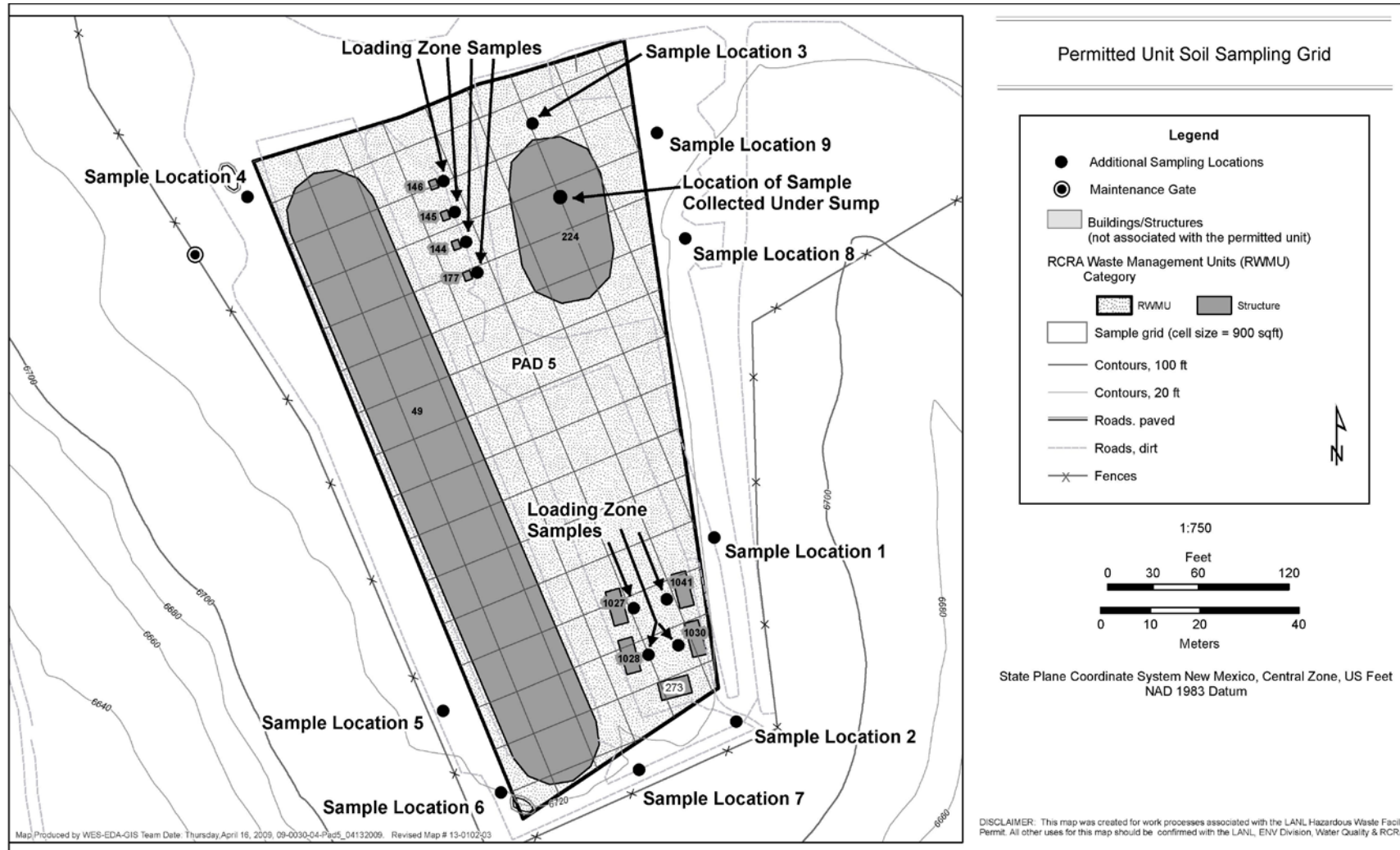


Figure G.8.1 Technical Area 54, Area G, Pad 5, Outdoor Container Storage Unit Soil Sampling Grid and Additional Sampling Locations

ATTACHMENT G.9
TECHNICAL AREA 54, AREA G, PAD 6
OUTDOOR CONTAINER STORAGE UNIT
CLOSURE PLAN

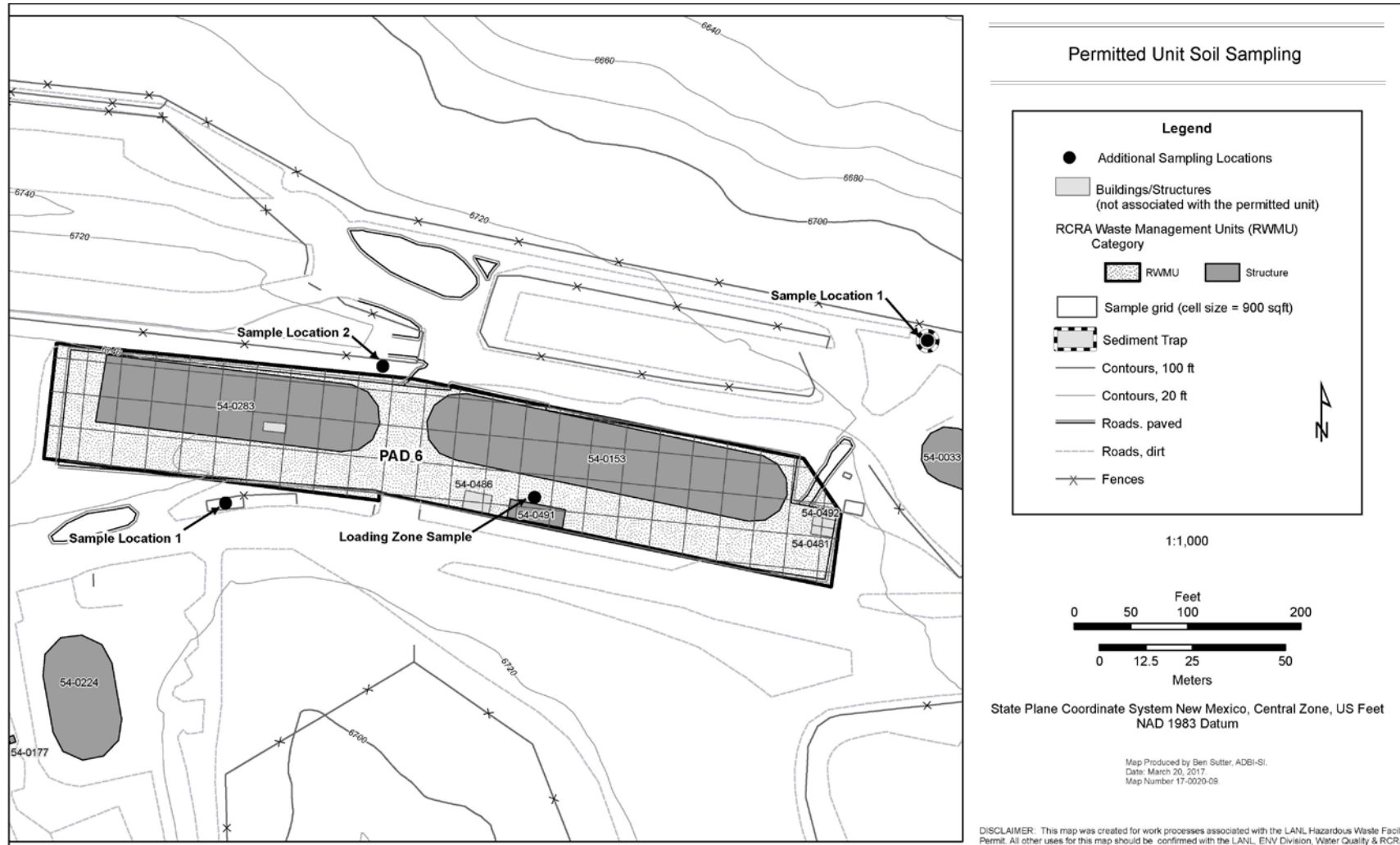


Figure G.9-1: Technical Area 54, Area G, Pad 6 Outdoor Container Storage Unit Sampling Grid and Additional Sampling Locations

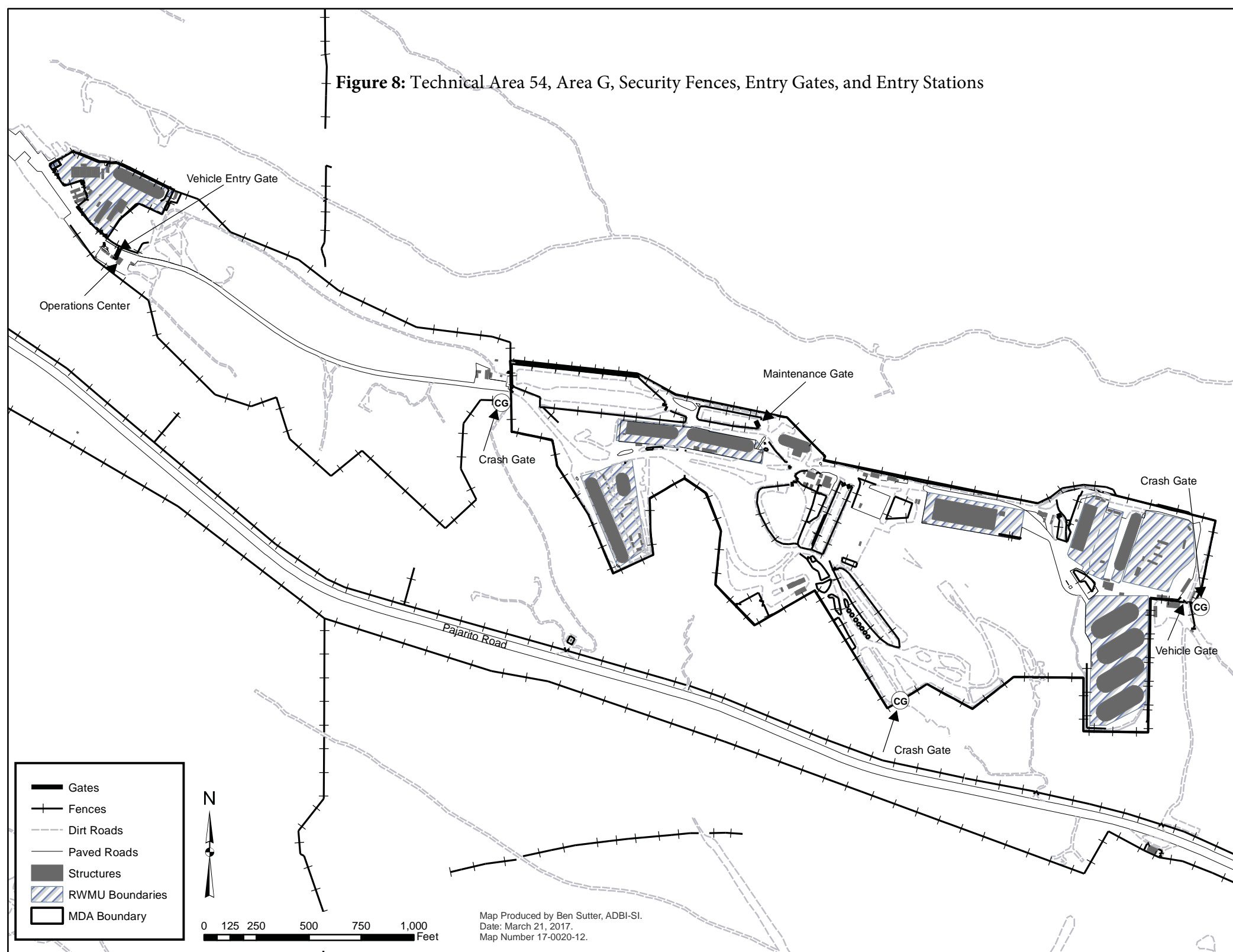
ATTACHMENT J
HAZARDOUS WASTE MANAGEMENT UNITS

Unit Identifier	Process Codes	Operating Capacity	General Information	Type of Unit
TA-54 Area G Pad 3	S01	213,840 gal	Includes Storage Dome 48 Approximately 17,000 square feet	Outdoor (associated with a regulated unit)
TA-54 Area G Pad 5	S01	623,480 gal	Includes Storage Domes <u>49 and 224</u> , and Storage Sheds 144, 145, 146, 177, 1027, 1028, 1030, and 1041 Pad 5 is a consolidation of former Pads 5, 7, and 8. Total square footage – 59,900	Outdoor (associated with a regulated unit)
TA-54 Area G Pad 6	S01	597,300 gal	Includes Storage Domes 153 and 283; Transportainer 491; and Storage Sheds 486, 522, 523, and 492. Approximately 62,700 square feet	Outdoor (associated with an regulated unit)
TA-54 Area G Pad 9	S01	1,446,720 gal	Includes Storage Domes 229, 230, 231, and 232; and Storage Sheds 574 and 484. Total square footage – 158,000	Outdoor (associated with a regulated unit)
TA-54 Area G Pad 10	S01	159,770 gal	Includes Transuranic (TRU) Waste Characterization Facilities: TA-54-0547 (SuperHENC), TA-54-0498 (LANL HENC), TA-54-0545 and 546 (Storage trailers), TA-54-0365 (Office Building Formerly MTGS), TA-54-0483 (Source Storage Trailer), and TA-54-1059 (Storage Trailer) Pad 10 is a consolidation of former Pads 2 and 4. Approximately 89,600 square	Outdoor (associated with a regulated unit)

ATTACHMENT N

FIGURES

Figure 8: Technical Area 54, Area G, Security Fences, Entry Gates, and Entry Stations



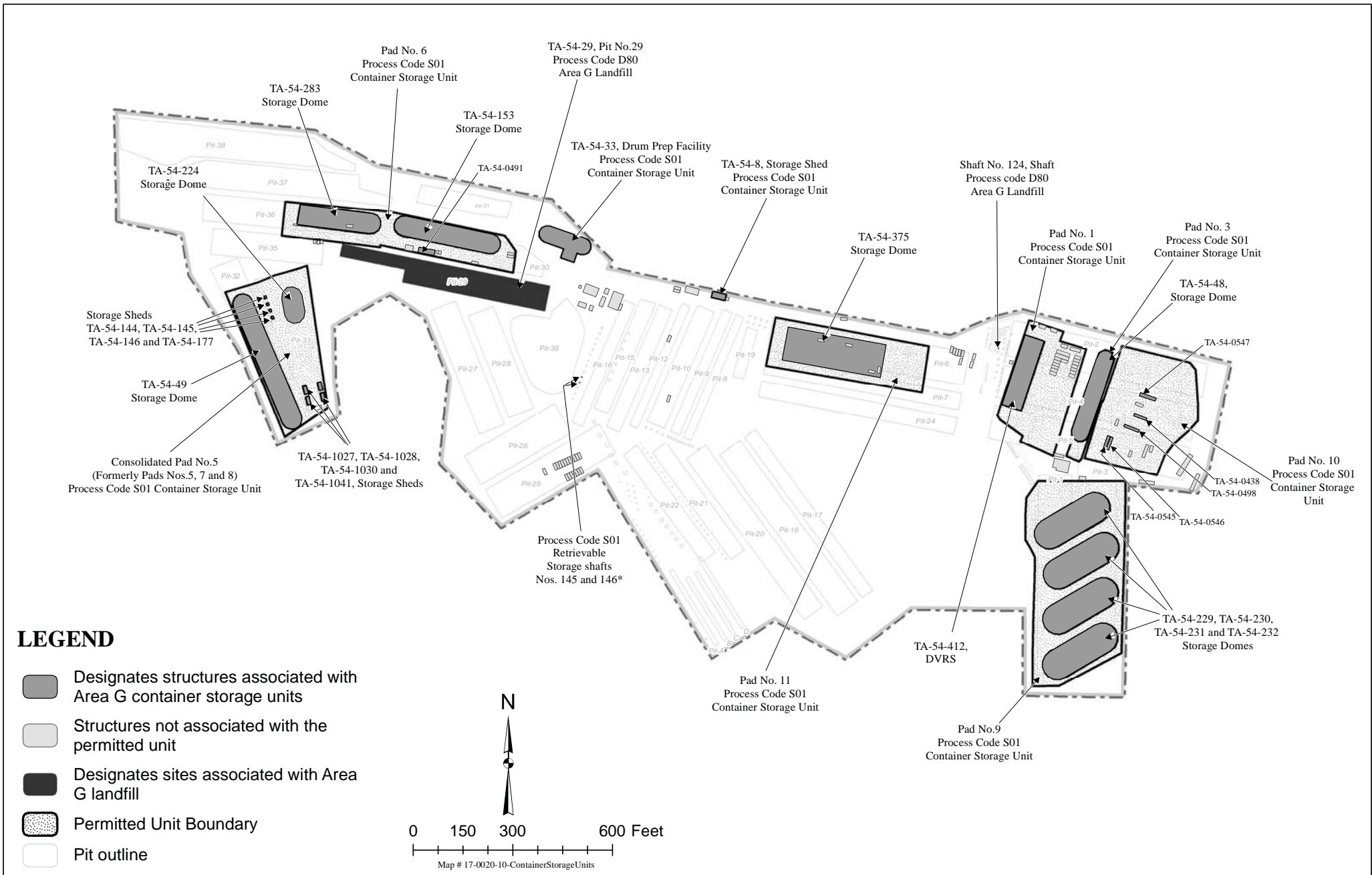


Figure 27: Technical Area 54, Area G, Container Storage Units

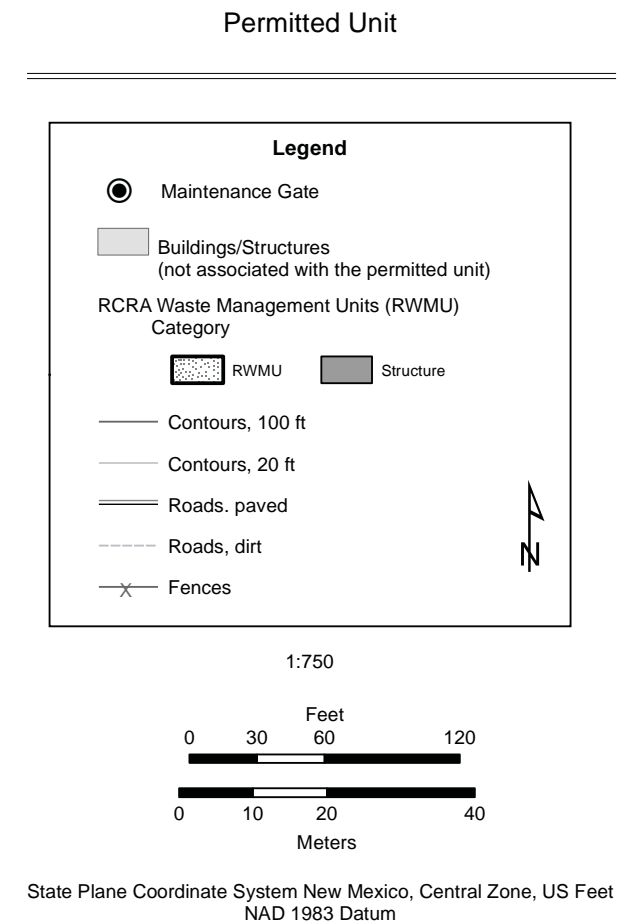
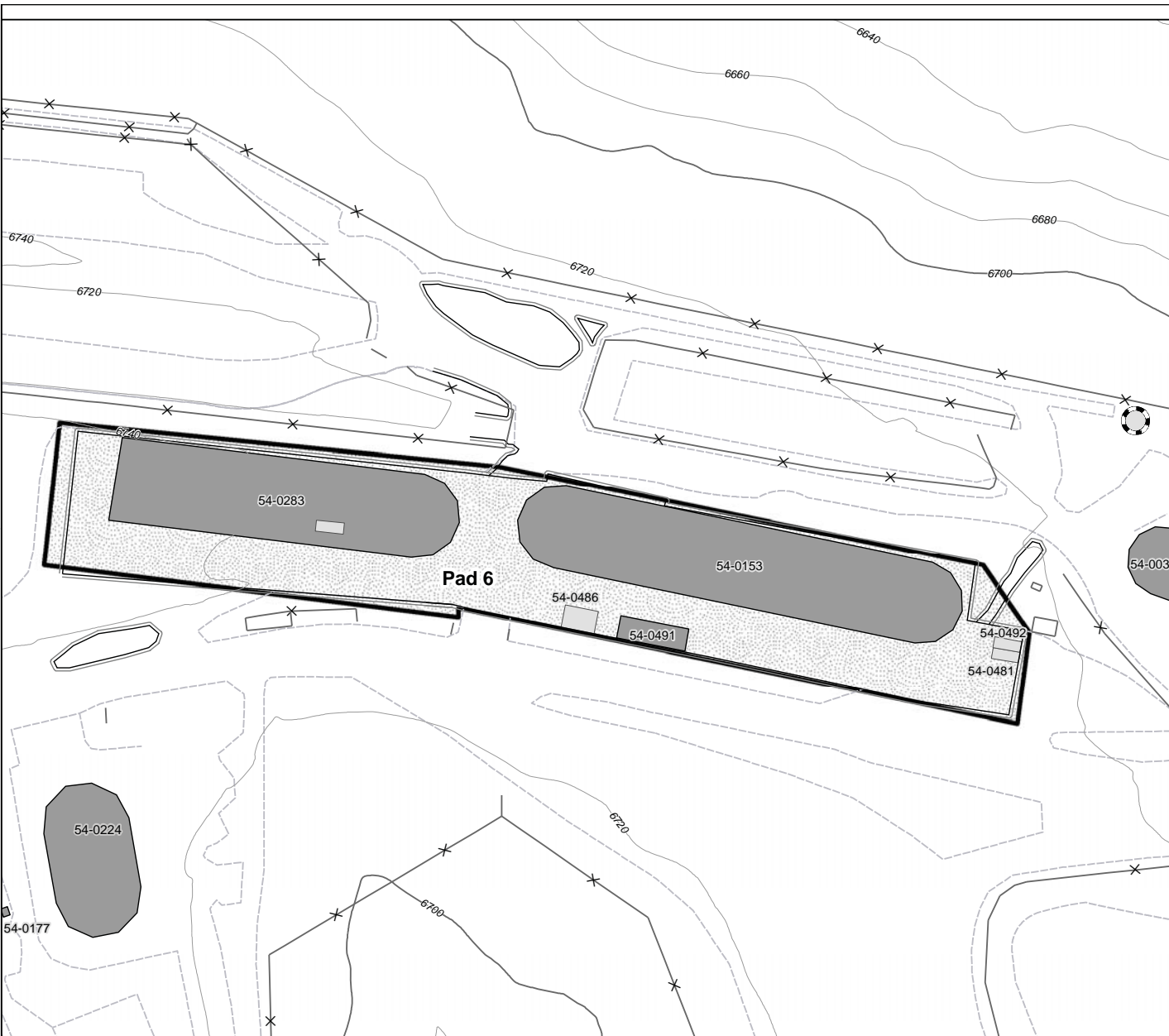



Figure 32: Technical Area (TA)-54, Area G, Pad 5 (Domes 49 and 224; and Storage Sheds 114, 145, 146, 177, 1027, 1028, 1030, and 1041)

DISCLAIMER: This map was created for work processes associated with the LANL Hazardous Waste Facility Permit. All other uses for this map should be confirmed with the LANL, ENV Division, Water Quality & RCRA..





Permitted Unit

Legend

 Buildings/Structures
(not associated with the permitted unit)

RCRA Waste Management Units (RWMU)
Category

 RWMU  Structure


 Sediment Trap

 Contours, 100 ft

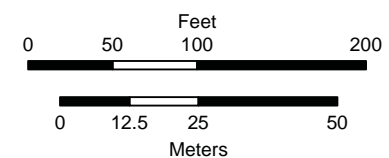
 Contours, 20 ft

 Roads, paved

 Roads, dirt

 Fences

1:1,000



State Plane Coordinate System New Mexico, Central Zone, US Feet
NAD 1983 Datum

Map Produced by Ben Sutter, ADBI-SI.
Date: March 20, 2017.
Map Number 17-0020-08.

DISCLAIMER: This map was created for work processes associated with the LANL Hazardous Waste Facility Permit. All other uses for this map should be confirmed with the LANL, ENV Division, Water Quality & RCRA..

Figure 33: Technical Area (TA)-54, Area G, Pad 6, (Domes 153 & 283)

Attachment 2
Certification

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.



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

7/21/2017

Date Signed



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

8-1-2017

Date Signed