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**Environmental Protection and Compliance Division**  
**Environmental Compliance Programs (EPC-CP)**  
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**National Nuclear Security Administration**  
**Los Alamos Field Office, A316**  
3747 West Jemez Road  
Los Alamos, New Mexico, 87544  
(505) 665-7314/Fax (505) 667-5948

Date: SEP 26 2016  
Symbol: EPC-DO-16-221  
LA-UR: 16-26002  
Locates Action No.: N/A



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

Dear Mr. Kieling:

**Subject: Transmittal of Class 1 Permit Modification Request to Remove Structure TA-55-PF-190 from the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, EPA ID No. NM0890010515**

The purpose of this letter is to submit a Class 1 permit modification request to remove one mobile structure located on the TA-55-4 Outdoor Container Storage Pad (TA-55-4 Outdoor Storage Pad) from the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit issued to the Department of Energy and Los Alamos National Security, LLC (the Permittees) in November 2010. The permit modification request provides proposed revisions to Permit Attachments A, G.26, J and N.

The proposed modifications have been prepared in accordance with the Code of Federal Regulations [CFR], Title 40 (40 CFR) § 270.42(a) as a permit modification requiring New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) approval. This Class 1 permit modification request consists solely of administrative changes in accordance with 40 CFR § 270.42, Appendix 1, Item A.1 and Permit Section 3.1(3). 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 are the transmittal letter, a signed certification page, a signed affidavit and one enclosure. Enclosure 1 provides a description of the proposed changes and pages of revised text and/or Figures from Attachments A, G.26, J and N.

Included herein are three hard copies and one electronic copy of this submittal. The hardcopy submittal contains pages or sections where text has been changed, rather than copies of the entire collection of Permit



attachments. The electronic copy, provided only to the New Mexico Environment Department Hazardous Waste Bureau (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 the transmittal of this permit modification request.

If you have comments or questions regarding this permit modification request, please contact Karen E. Armijo (DOE) at (505) 665-7314 or Mark Haagenstad (LANS) at (505) 665-2014.

Sincerely,



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

Sincerely,



Karen E. Armijo  
Permitting and Compliance Program Manager  
National Nuclear Security Administration  
Los Alamos Field Office  
U.S. Department of Energy

JCB:KEA:MPH:SDG/lm

Enclosure: 1) Class 1 Permit Modification Request for Removal of TA-55-PF-190 Structure from Technical Area (TA)-55 Building 4 Outdoor Container Storage Pad (TA-55-4 Outdoor Pad)

Cy: Laurie King, USEPA/Region 6, Dallas, TX (E-File)  
Kathryn M. Roberts, NMED/HWB, Santa Fe, NM, (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)  
Kimberly Davis Lebak, NA-LA, (E-File)  
Peter Maggiore, NA-LA, (E-File)  
Karen E. Armijo, NA-LA, E-File)  
Jody M. Pugh, 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)  
Keith Lacy, NPI-7, (E-File)  
Joseph A. Gonzales NPI-7, (E-File)

Mr. John E. Kieling  
EPC-DO-16-221

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Cy (continued):

Mark P. Haagenstad, EPC-CP, (E-File)

Shanon Goldberg, EPC-CP, (E-File)

Jeff Carmichael, EPC-CP, (E-File)

Patrick Padilla, EPC-CP, (E-File)

Ellena I. Martinez, EPC-CP, (E-File)

[lasomailbox@nnsa.doe.gov](mailto:lasomailbox@nnsa.doe.gov), (E-File)

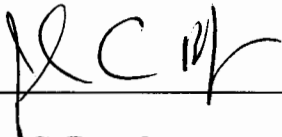
[locatesteam@lanl.gov](mailto:locatesteam@lanl.gov), (E-File)

[epc-correspondence@lanl.gov](mailto:epc-correspondence@lanl.gov), (E-File)

[rcra-prr@lanl.gov](mailto:rcra-prr@lanl.gov), (E-File)

### 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.



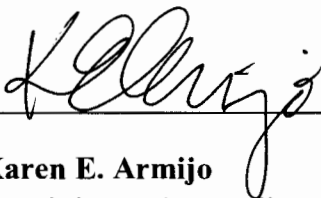
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**John C. Bretzke**  
Division Leader  
Environmental Protection and Compliance Division  
Los Alamos National Security, LLC  
Operator

9-19-16

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**Date Signed**



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**Karen E. Armijo**  
Permitting and Compliance Program Manager  
National Nuclear Security Administration  
Los Alamos Field Office  
U.S. Department of Energy  
Owner/Operator

20 Sept 2016


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**Date Signed**

**AFFIDAVIT**

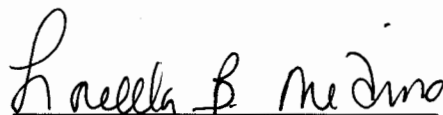
- 1. I, Keith A. Lacy, am an employee of Los Alamos National Security, LLC, at Los Alamos National Laboratory (LANL) and have been employed at LANL for 18 years.
- 2. I am the Group Leader of the Nuclear Process Infrastructure, Hazardous Materials Management group and oversaw hazardous and mixed low-level waste management operations at TA-55 since 2014.
- 3. The information in this affidavit reflects my personal knowledge of the TA-55-PF-190 container storage building, as well as information provided to me by the employees who undertake waste management operations at TA-55.
- 4. TA-55-PF-190 is a structure that contains a less than 90-day hazardous waste accumulation area. The TA-55-PF-190 structure is currently located within the boundary of the TA-55 Container Storage Pad permitted unit. The building stored and supported waste management activities associated with the less than 90-day hazardous waste accumulation area and has also served as a universal waste storage area. Building TA-55-PF-190 has never received waste from any permitted unit.
- 5. TA-55-PF-190 has been in use since May 29, 2015. Review of inspection records and interviews with NPI-7 personnel reveal no hazardous waste spills or releases has occurred in association with waste management activities at building TA-55-PF-190.
- 6. TA-55-PF-190 will be moved outside of the TA-55 Container Storage Pad and will continue to be used as less than 90-day hazardous waste accumulation area. The building will not be located within a permitted unit boundary.

FURTHER AFFIANT SAYETH NAUGHT.

  
 \_\_\_\_\_  
 Keith A. Lacy

STATE OF NEW MEXICO )  
 )  
 )ss.  
 COUNTY OF LOS ALAMOS )

SUBSCRIBED, SWORN TO AND ACKNOWLEDGE before me this 12<sup>th</sup> day of  
Sept., 2016 by Louella B. Medina.

  
 \_\_\_\_\_  
 NOTARY PUBLIC

My Commission Expires:

5/5/2019

