

Hazardous Waste Facility Permit

Class 3 Permit Modification Public Meeting



Wednesday August 30, 2017



Operated by Los Alamos National Security, LLC for the U.S. Department of Energy's NNSA

Agenda

Wednesday August 30, 2017

5:30 pm to 7:30 pm

Fuller Lodge
Los Alamos, NM

- Department of Energy - Karen Armijo
- Permit Modification Request - Gian Bacigalupa



Information Meeting

- The goal of the meeting is to provide information regarding this Permit Modification Request to modify the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit)
- Written public comments should be submitted to the New Mexico Environment Department (NMED) by the end of the public comment period on September 22, 2017

Meeting Protocol

Please

- Sign-in and state your affiliation and contact information if applicable
- Identify yourself before speaking
- Honor the process by being respectful and courteous
- Hold questions until time designated by the speaker
- Yield the floor if requested

Karen E. Armijo
NNSA Los Alamos Field Office

DOE and LANL

- **Established in 1943 to support the Manhattan Project**
- **LANL is an NNSA Site, oversight of NNSA mission is performed by the NNSA Los Alamos Field Office (NA-LA)**
 - Mission: To strengthen United States' security through the military application of nuclear energy and by reducing the global threat from terrorism and weapons of mass destruction
- **Operated by Contractors for the Government since 1943**
 - Los Alamos National Security, LLC (LANS) won the Management & Operating contract in 2005 and presently operates the site for NNSA and EM
 - DOE and LANS are co-Permittees in the RCRA Hazardous Waste Facility Permit for LANL

Changes at LANL

- **In 2015, DOE established an Environmental Management Field Office at Los Alamos (EM-LA)**
 - Mission: Cleanup of legacy contamination and waste resulting from nuclear weapons development and government-sponsored nuclear research at LANL
- **NA-LA and EM-LA are part of DOE and are responsible for carrying out their respective missions within federal, state and local policies/regulations and appropriations requirements.**
 - Near-term transition of EM-scope to new contractor in FY18
 - Future contract transition of NA-scope in FY18/19

Gian Bacigalupa

LANS

2010 LANL Hazardous Waste Facility Permit

- The Permit was issued by the NMED in November 2010, effective December 2010
 - 1 storage tank system (Technical Area (TA)-55)
 - 1 cementation treatment unit (TA-55)
 - 1 stabilization treatment and storage unit (TA-50-69)
 - 24 container storage units (TAs 3, 50, 54, 55 and 63)
- General Permit Conditions (Parts 1-11)
- Attachments
 - Unit descriptions, Waste Analysis Plan, Contingency Plan, Inspection Plan, Training Plan
 - Lists of hazardous waste management units, corrective action units
 - Unit figures

Description of Permit Modification Request

- Supports the public comment process for the revision of the Permit incorporating the provisions of the April 21, 2017 Settlement Agreement between NMED and the Permittees
- The permit modification request includes a description of the revisions to the Permit, a crosswalk of regulatory permitting requirements and the specific proposed changes to the Permit

Integration with the Consent Order

- This permit modification integrates closure requirements for regulated units at TA-54 under the 2016 Compliance Order on Consent (Consent Order)
- Integration ensures that closure and clean-up of these units is comprehensive and consolidated under one regulatory framework to avoid duplication and potential conflict
- EPA and NMED rules authorize and encourage this type of integration because these units qualify for alternative closure requirements

Permit Section 1.9.1, Permittees' Responsibilities

- The permit modification request deletes a condition that was added after the draft Permit review process and not subject to public review
- Allows future delegation of specific permit responsibilities to be included through the permit modification process if necessary

Permit Section 4.6, TA-50 Radioactive Liquid Waste Treatment Facility

- This permit modification removes conditions that are no longer necessary because the RLWTF is a wastewater treatment facility and any discharges from the facility are regulated under an EPA Clean Water Act National Pollutant Discharge Elimination System (NPDES) Permit certified by NMED and a forthcoming Ground Water Discharge Permit
- In addition, the facility is exempt from RCRA permitting as a waste water treatment facility

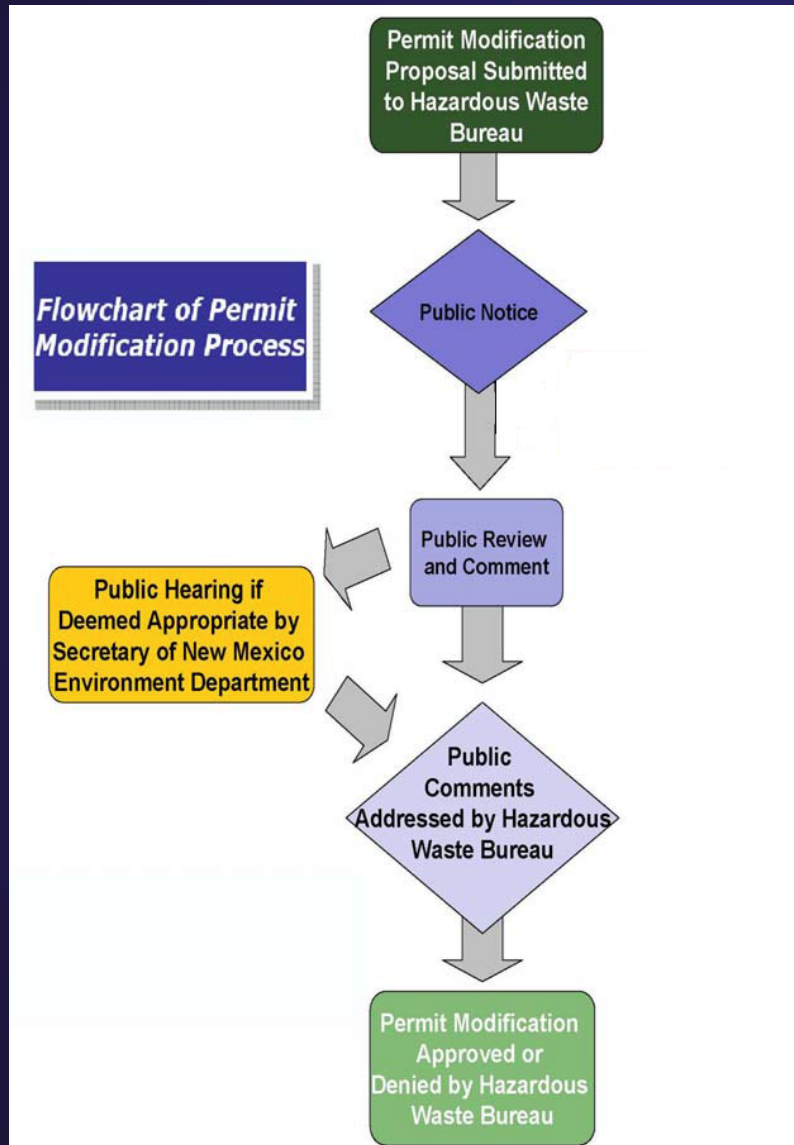
Attachment G, Removal of radioactive waste disposal references in closure plans

- Waste stream disposal options tables are present in closure plans in the Permit
- This permit modification request includes the removal of the solid low-level radioactive waste disposal description from those tables
- Affects all current closure plans in the Permit

Affected Sections of the Permit

- Additions and changes within the text
 - Permit Part 1 – General Permit Conditions
 - Permit Part 4 – TA-55 Storage in Tanks and Treatment by Stabilization
 - Permit Part 9 - Closure
 - Attachments G.1 – G.30, Closure Plans
 - Attachment J – Hazardous Waste Management Units

Process for Permit Modification and Public Comments



- Review permit modification request and submit comments to NMED before the end of the public review and comment period (July 23 to September 22, 2017)
- NMED reviews and responds to public comments regarding the permit modification request
- NMED issues final decision

Public Comment Process After Submittal

- Notifications of submittal to the public
 - Newspapers (July 23, 2017)
 - Email (LANL mailing list)
 - Public notice mailing (NMED maintained facility mailing list)
- 60-day public comment period started by newspaper public notice publication
- The Permit Modification Request is available for public review at the LANL Electronic and Hardcopy Public Reading Rooms
 - EPRR URL: <http://epr.lanl.gov>
 - HPRR: 94 Cities of Gold Road, Pojoaque NM

How to Make Comments:

- Submit written or email comments:
 - Neelam Dhawan, Program Manager
 - New Mexico Environment Department
 - Hazardous Waste Bureau
 - 2905 Rodeo Park Drive East, Building 1
 - Santa Fe, New Mexico 87505
 - Email: neelam.dhawan@state.nm.us
- Comments must be made in writing or via e-mail and include the commenter's name and address