

DATE: May 9, 2025

TO: Jennifer Carr, Administrator

FROM: Christine Andres, Chief, Bureau of Federal Facilities

SUBJECT: Quarterly Report: January 1, 2025 to March 31, 2025

FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

(FFACO) QUARTERLY REPORT

Industrial Sites Activity

At the end of March 2025, there were 1962 historical Corrective Action Sites (CASs) (out of 1970 total) that have been closed, with three (3) CASs in Corrective Action Unit (CAU) 114 and five (5) CASs in CAU 572, all of which continue to undergo active D&D work by the Department of Energy's Environmental Management Nevada Program (EM NV).

The Nevada Division of Environmental Protection Bureau of Federal Facilities' (NDEP or BFF) staff continued document reviews, Use-Restrictions reviews, and post-closure inspections for a number of closed Industrial Sites on the Nevada National Security Site (NNSS), as described below:

Document Reviews and Letters:

CAU 5 – Landfills – Following a site visit on December 7, 2023, BFF staff responded to a November 1, 2023, Draft *Notification of Unauthorized Activity in the Corrective Action Unit (CAU) 5, Landfills, Corrective Action Site (CAS) 23-15-03, Disposal Site, Use Restriction (UR)* with a comment letter, including follow-up questions, dated January 4, 2024. This letter also provided formal documentation for the site visit and meeting conducted on December 7, 2023. On January 24, 2024, BFF staff received a *Response to the Nevada Division of Environmental Protection (NDEP) Regarding Unauthorized Activity in the Corrective Action Unit (CAU) 5, Landfills, Corrective Action Site (CAS) 23-15-03, Disposal Site, Use Restriction (UR)* (Response). On February 21, 2024, a meeting to discuss the Response was held between BFF staff and DOE personnel and their contractors. On March 6, 2024, BFF responded to the Response to document the meeting held on February 21, 2024, and provide BFF's requests regarding the unauthorized activity at CAU 5. The BFF was notified in May that a corrective action would be undertaken to address the unauthorized activity and requested coordination of a site visit once the corrective action is complete. On August 26, 2024, BFF staff received the *Transmittal of Use Restriction (UR) Information for Corrective Action Unit (CAU) 5*, which detailed the modifications to the Use Restriction as discussed in the Response. In March 2025, BFF was given a current update on the corrective action progress being taken at CAU 5. The contractor is still waiting on one of the Use Restriction signs, which will then be mounted, and BFF will be notified to arrange a site visit to close out this corrective action.

CAU 114 – Area 25 Engine Maintenance, Assemble, and Disassembly (EMAD) Facility – On December 23, 2024, BFF received the Submittal of the Draft SAFER Plan for CAU 114: Area 25 EMAD Facility, NNSS, Nevada, Revision 1, December 2024. A response letter will be issued next quarter.

Meetings and Site Visits:

A monthly FFACO meeting is held between BFF and EM NV personnel to discuss any relevant topics and the status of correspondence. Meetings were held on January 7, February 20, and March 13, 2025.

Meetings to discuss progress on work being done at CAU 114: EMAD and CAU 572: Test Cell C Ancillary Building and Structures (TCC) were held on January 23, 2025, and February 24, 2025. The February 24, 2025, meeting was used as Corrective Action Alternative (CAA) meeting as well.

On February 26, 2025, the BFF chief, supervisor, and staff traveled to the NNSS to observe the ongoing demolition at TCC and EMAD.

On March 6, 2025, BFF staff attended a virtual meeting via Microsoft Teams with EM NV and their contractors to discuss the Data Quality Objective (DQO) of the water tower that had been demolished at the EMAD facility.

On March 19 and March 26, 2025, the BFF supervisor and/or staff traveled to the NNSS to observe the ongoing demolition at the EMAD facility.

Soils Activity Sites

At the end of December 2019, all Soil CASs, a total of 144, had been closed.

Underground Test Area (UGTA) Activity

There are five (5) UGTA CAUs, all of which are either in the Corrective Action Decision Document/ Corrective Action Plan (Model Evaluation for UGTA sites) or in long-term monitoring during the Closure Stage. During this quarter, BFF staff participated in the process of document review, project evaluation, site visits, meetings and/or teleconferences for the UGTA Activity and CAUs 101 and 102 – Central and Western Pahute Mesa in the following ways:

Document Reviews and Letters:

BFF staff received the *Submittal of the Draft UGTA Activity Waste Management Plan, Revision 0, Including the Draft Fluid Management Plan for the UGTA Activity, Revision 0, October 2024*, on October 17, 2024. A comment letter was issued by BFF on December 18, 2024. On March 17, 2025, BFF staff received the *Submittal of the Final Underground Test Area Activity Waste Management Plan, Revision 1, Including the Fluid Management Plan for the Underground Test Area activity, Revision 1, March 2025*. A response letter was issued on March 25, 2025.

On December 5, 2024, BFF staff received the Submittal of the Draft UGTA *Sampling Plan for CAUs 101 and 102: Central and Western Pahute Mesa, NNSS, Nevada, Revision 2, November 2024*. A response letter with comments was issued on January 6, 2025.

On December 16, 2024, the BFF chief, supervisor and staff attended the Well Installation Presentation #4 for CAUs 101 and 102 – Central and Western Pahute Mesa. Later that day, BFF staff received the *Request for Notice of Completion on CAU 101: Central Pahute Mesa and CAU 102: Western Pahute Mesa Well Installation Presentation #4 Milestones*. A response letter, with a Notice of Completion, was issued on January 13, 2025.

On February 24, 2025, BFF staff received the Submittal of the Draft *Corrective Action Decision Document/ Corrective Action Plan (CADD/CAP) for Corrective Action Units (CAUs) 101 and 102: Central and Western Pahute Mesa, Nevada National Security Site, Nevada, Revision 2, February 2025*. A comment letter was issued on March 11, 2025.

Meetings and Site Visits:

Informal UGTA Discussion Meetings – A practice was begun in the beginning of 2022 of holding an “informal” Teams meeting with EM NV, Navarro, DRI and BFF staff about every six weeks to discuss present and upcoming UGTA documents or activities or any other outstanding UGTA subjects. This quarter’s meeting was held on February 5, 2025.

On March 4, 2025, BFF staff attended a well sampling event at the NNSS with members of the Nevada Site Specific Advisory Board (NSSAB).

Nevada Off-Sites and the Tonopah Test Range

There are four (4) Nevada Off-Sites CAUs, two (2) Surface CAUs (CAU 416 and 417) and two (2) Subsurface CAUs (CAU 443 and 447). CAU 416 has been clean closed. CAU 417 is in Post-Closure Monitoring. CAUs 443 and 447 are in the Closure Stage. On September 30, 2020, the Office of Legacy Management (LM) assumed responsibility for the long-term surveillance and maintenance of the Tonopah Test Range (TTR) FFACO sites. NDEP activities for the TTR sites are reported under this Section.

Tonopah Test Range – On February 10, 2025, BFF staff received the *Submittal of Draft Postclosure Inspection Report for the Tonopah Test Range and Nevada Test and Training Range, Nevada, Sites for Calendar Year 2024*. A comment letter was issued on February 13, 2025. On March 20, 2025, BFF staff received the *Submittal of Final Postclosure Inspection Report for the Tonopah Test Range and Nevada Test and Training Range, Nevada, Sites for Calendar Year 2024*. A response letter was issued on March 24, 2025.

General FFACO Business:

Federal Facility Agreement and Consent Order (FFACO) - On February 5, 2025, the BFF chief, supervisor, and staff attended the annual FFACO meeting in person with the signatories to the FFACO.

Use Restriction Management Plan - On January 15, 2025 BFF staff received the *Draft FFACO NNSS URMP, Revision 1, January 2025*. A response letter was issued on February 3, 2025. On March 13, 2025, BFF staff received the *Submittal of the Final Federal Facility Agreement and Consent Order (FFACO) Nevada National Security Site (NNSS) Use Restriction Management Plan (URMP), Revision 1, March 25* Federal Facility Agreement and Consent Order. A response letter approving the document was issued on March 14, 2025.

Use Restrictions (URs) and General FFACO Work – Throughout this quarter, BFF staff have reviewed updated URs submitted by the EM NV. Comments are offered when necessary. The Use Restriction Management Plan (URMP) will be periodically revised by the EM NV to add updated NDEP-accepted URs.

FFACO Transition – As the active investigation/remediation work under the FFACO nears completion, the Department of Energy (DOE) and NDEP have undertaken the FFACO Transition Project to ensure that any future steward of the NNSS will be aware of all post-closure monitoring requirements on the NNSS by the addition of Appendix VII to the FFACO. The Bureau Chief represents NDEP on this working group. On February 22, 2024, the *Final Agreement to Modify the Federal Facility Agreement and Consent Order (FFACO) (Agreement)* was emailed to all Signatory Agencies, and it continues to remain with the last Agency for signature.

A FFACO transition meeting was held on February 5, 2025. The BFF chief, supervisor, and staff attended this meeting in person with all parties that will be affected by the site transition.

Affirmation Forms – As the active investigation/remediation work under the FFACO nears completion, in addition to the FFACO Transition project, a Closure Affirmation Form project was undertaken by EM NV and Navarro to ensure that the documentation for the closure of each CAU identified in the FFACO, inclusive of its associated corrective action sites, is complete in accordance with FFACO standards. Each Closure Affirmation Form requires acceptance through signature by the Bureau Chief. This project is slated to be completed by the end of June 2025.

File Management – This quarter, staff have continued to organize, scan for electronic storage, and document files for FFACO sites.

Miscellaneous:

The chief, and in her absence the supervisor, participated in monthly NDEP Attorney General staff meetings, bi-weekly Division-Wide Chief's Staff Meetings and bi-weekly meetings with the Deputy Administrator either in person or via virtual meetings in January, February, and March 2025.

During this quarter, the bureau chief attended or participated virtually in: (1) numerous calls, meetings and/or webinars as a member of the NGA's Federal Facilities Task Force (FFTF), the State, Tribal, Government Working Group (STGWG), the Environmental Council of States (ECOS) and/or the Combined Intergovernmental Working Group (CIWG) Planning Committee; (2) two Nevada Site-Specific Advisory Board meetings; (3) regular bureau staff meetings and meetings with individual staff; (4) the quarterly Low-Level Waste Stakeholders meeting; (5) a number of meetings with various DOE staff on both FFACO and Waste topics.

Tribal Interaction – During several virtual and in-person meetings this quarter with the State, Tribal, Government Working Group, the bureau chief interacted with a number of Tribes throughout the United States who have ties to the actions of the Department of Energy.

Staff Training:

BFF staff completed the following training: 2025 KnowBe4 Security Awareness Training

Agreement in Principle (AIP) Functional Areas Summary – Grant #DE-EM0005237 0003

1. On-Site Discharges - Water Pollution Control

Document Reviews and Site Inspections:

Water Pollution Control Permit GNEV93001 – The Nevada Division of Environmental Protection’s (NDEP) Bureau of Federal Facilities (BFF) staff received the *Discharge Monitoring Report for Nevada National Security Site Sewage Ponds, Water Pollution Control Permit GNEV93001, October 1, 2024, through December 31, 2024*, on January 27, 2025. BFF staff reviewed the report and sent a response letter to the National Nuclear Security Administration/Nevada Field Office (NNSA/NFO) on February 4, 2025, acknowledging the limits set forth in the permit had been met for the quarter.

Water Pollution Control Permit GNEV96021 – BFF staff received the *E-Tunnel Wastewater Discharge Permit Quarterly Monitoring Report and Annual Summary Report for Fourth Quarter and Calendar Year 2024* on January 21, 2025. BFF staff reviewed the report and sent a response letter to the NNSA/NFO on February 4, 2025, acknowledging the limits set forth in the permit had been met for the quarter.

Spill Report Number 231121-01 – BFF staff received the *Land Use Restriction, Nevada Division of Environmental Protection (NDEP) Spill Report Number 231121-01* on February 5, 2025. BFF issued a response on February 6, 2025.

Spill Report Number 240729-02 – BFF staff received Spill Report Number 240729-02 on July 29, 2024. The *Nevada Division of Environmental Protection Spill Report #240729-02* letter was sent to National Nuclear Security Administration/Sandia Field Office (NNSA/SFO) on July 30, 2024, requesting additional information about the spill and clarification about the spill date. The BFF received the *National Technology and Engineering Solutions of Sandia, LLC (NTESS) - Sandia National Laboratories (SNL)/Tonopah Test Range (TTR), Thirty-Day Follow-up Report for the JP-10 Jet Fuel Release at TTR Antelope Lake* on August 20, 2024. The Report stated that additional sampling was required and would be submitted to NDEP as an addendum. A response letter was sent to NNSA/SFO on September 4, 2024, acknowledging the additional sampling and asking for clarification on the spill date. BFF staff received the *Addendum to National Technology and Engineering Solutions of Sandia, LLC (NTESS) - Sandia National Laboratories (SNL)/Tonopah Test Range (TTR), Thirty-Day Follow-up Report for the JP-10 Jet Fuel Release at TTR Antelope Lake* and the *Second Addendum to National Technology and Engineering Solutions of Sandia, LLC (NTESS) - Sandia National Laboratories (SNL)/Tonopah Test Range (TTR), Thirty-Day Follow-up Report for the JP-10 Jet Fuel Release at TTR Antelope Lake* on September 19, 2024. The first addendum included sampling results and addressed a need for additional sampling, while the second addendum clarified the spill date. BFF staff contacted the NTESS staff on December 16, 2024, to inquire about the additional testing results. NTESS staff informed BFF that the additional sampling results were currently going through review and would be sent out soon. BFF staff received the *Follow-up Report – Request for Site Closure, Jet Fuel Release at the Tonopah Test Range, Antelope Lake (dry lake bed) Reverence Nevada Department of*

Environmental Protection (NDEP) Spill Report #240729-02, on January 6, 2025. A response letter was sent on January 13, 2025, stating that all comments had been satisfactorily addressed and no further remedial action at the spill site is required at this time.

Septic Tank Closure Plan – BFF staff received the *Nevada National Security Site Nevada Field Office (NNSA/NFO)*, *Septic Tank Closure Plan* on November 12, 2024. On November 26, 2024, BFF staff received a new submittal for the Septic Tank Closure Plan and a request to replace the earlier version due to an issue with the signature. BFF issued a response letter approving the Septic Tank Closure Plan on January 13, 2025.

Water Pollution Control General Permit GNEVOSDS09 – BFF staff was copied on, and reviewed, the *Annual Reports for the Nevada National Security Sites (NNSS) On Site Sewage Disposal Systems, Water Pollution Control General Permit GNEVOSDS09, Letter of Inclusion L-0271 Through L-0276* submitted to the BWPC on January 28, 2025.

Meetings and Site Visits:

The quarterly water meeting was held on January 29, 2025.

2. Ground Water Monitoring

There was no activity in this category during this quarter.

3. Air Quality Monitoring

There was no activity in this category during this quarter.

4. Low-Level and Mixed Low-Level Waste Oversight

Conference Calls:

Staff participated in weekly Waste Acceptance Review Panel (WARP) meetings via teleconference during January, February, and March 2025. Review panel members discussed waste profile comments and waste-specific compliance issues for generator-submitted low-level radioactive (LLW) and mixed low-level radioactive (MLLW) waste profiles, along with Pre-Treatment Notifications, as they pertain to Nevada National Security Site Waste Acceptance Criteria (NSSWAC), DOE/NV--325-22-00, which became effective a February 29, 2024. As applicable, BFF staff reviewed and provided comments on LLW, MLLW, classified non-radiological non-hazardous, and classified radiological hazardous waste profiles and reviewed all comment responses submitted by the currently approved waste generators.

Documents Received/Reviewed:

The *Nevada National Security Sites (NNSS) Waste Certification Program (WCP) Surveillance Report, SRV-25-002-LRY5*, was received on January 8, 2025.

The Military Range Activity Notification – Pro Force 40MM Range, was received on January 8, 2025.

The Nevada National Security Site (NNSS) Quarterly Hazardous Waste Volume Report and Fee: Fourth Quarter Calendar Year 2024, was received on January 9, 2025.

The Perma-Fix Environmental Services, Inc. (Perma-Fix) Waste Certification Program (WCP) Surveillance Report, SRV-25-003-PERM, was received on January 16, 2025.

The Energy Solutions – Bear Creek Processing Facility (ES) Waste Certification Program (WCP) Audit Report, ADT-25-001-DTRK, was received on January 31, 2025.

The Mission Support and Test Services LLC (MSTS) Waste Certification Program (WCP) Response to Environmental Management Nevada Program Radioactive Waste Acceptance Program (RWAP) Surveillance SRV-25-002-LRY5 Observation OBS-25-003-LYR5, was received on February 6, 2025.

The Radioactive Waste Acceptance Program (RWAP) Audit of Tru Waste Processing Center (TWPC) Waste Certification Program (WCP), Audit No. ADT-25-004-FWOR, was received on February 6, 2025.

The Closure of Issues Identified During ADT-24-003-LANL Audit of Los Alamos National Laboratory (LANL), was received on February 6, 2025.

The Approval for Jhon Carilli to Perform Container Visual Verifications at the Nevada Environmental Program Services (NEPS) for the Radioactive Waste Acceptance Program (RWAP), was received on February 11, 2025.

The Radioactive Waste Acceptance Program (RWAP) Audit of Portsmouth Gaseous Diffusion Plant (PORTS) Waste Certification Program (WCP), Audit No. ADT-25-009-PORT, was received on February 24, 2025.

The Completion of Disposal Activities at Area 3 RWMS, was received on February 24, 2025.

The Oak Ridge Reservation (ORR) Waste Certification Program (WCP) Surveillance Report, SRV-25-004-ORTN, was received on March 3, 2025.

The Closure of Issues Identified During Audit ADT-24-005-PERM of Perma-Fix Environmental Services, Inc. (Perma-Fix), was received on March 3, 2025.

The Closure of Issues Identified During Audit SRV-24-007-FWOR of Tru Waste Processing Center (TWPC), was received on March 3, 2025.

The Radioactive Waste Acceptance Program (RWAP) Audit of Y-12 National Security Complex (Y-12) Waste Certification Program (WCP), Audit No. ADT-25-005-BWXT, was received on March 10, 2025.

The Sandia National Laboratories (SNL) Waste Certification Program (WCP) Surveillance Report, OSV-25-007-ASLA, was received on March 10, 2025.

The *Los Alamos National Laboratory (LANL) Waste Certification Program (WCP) Surveillance Report, SRV-25-005-LANL*, was received on March 19, 2025.

The *Paducah Gaseous Diffusion Plant (PGDP) Waste Certification Program (WCP) Surveillance Report, SRV-25-006-PGDP*, was received on March 24, 2025.

The *Radioactive Waste Acceptance Program (RWAP) Audit of Oak Ridge National Laboratory (ORNL) Waste Certification Program (WCP), Audit No. ADT-25-006-ORNL*, was received on March 27, 2025.

Profiles Reviewed:

BFF staff reviewed a total of nine (9) waste profiles and one (1) pre-treatment notification this quarter. Six (6) profiles were strictly for LLW requiring disposal in Department of Energy (DOE) Order 435.1 LLW landfills. Three (3) profiles were strictly MLLW requiring disposal in the NDEP permitted RCRA cell.

Meetings:

BFF staff participated in DOE's quarterly LLW Stakeholder's Meeting on February 6, 2025, in Las Vegas, NV.

Waste Generator Suspensions:

There is currently one (1) waste generator suspension.

Active Profiles:

There are currently 197 active profiles, comprised of 48 Mixed LLW/Hazardous non-rad profiles, 25 LLW/Non-Rad Solid Waste profiles and 124 LLW profiles.

Suspended Profiles:

There are currently six (6) profiles under suspension.

Site Visits/Radioactive Waste Generator Facility Evaluations:

The Radioactive Waste Acceptance Program (RWAP) conducted three (3) surveillances, two (2) audits, and no split sampling events this quarter. NDEP participated in three (3) surveillance, and two (2) audit this quarter as described in the sections below.

Surveillances:

Oak Ridge Reservation (ORR) - United Cleanup Oak Ridge, LLC (UCOR) – Oak Ridge, TN - During the week of January 13, 2025, BFF personnel, along with staff from the EM NV

contractor, participated in the surveillance of this waste generator. The surveillance was scheduled for DOE to verify programmatic and performance-based compliance to the NNSSWAC (DOE/NV--325-22-00). RWAP members completed checklists specific to the elements being evaluated by conducting interviews, reviewing procedures and conducting field inspections. NDEP personnel were provided access to interviews, procedures and field inspections when requested. One (1) observation was issued by EM NV as a result of the surveillance.

Triad National Security, LLC, Los Alamos National Laboratory, Los Alamos, NM – During the week of February 10, 2025, BFF personnel, along with staff from the EM NV contractor, participated in the surveillance of this waste generator. The surveillance was scheduled for DOE to verify programmatic and performance-based compliance to the NNSSWAC (DOE/NV--325-22-00). RWAP members completed checklists specific to the elements being evaluated by conducting interviews, reviewing procedures, and conducting field inspections. NDEP personnel were provided access to interviews, procedures, and field inspections when requested. One (1) Priority II finding and two (2) observations were issued by EM NV as a result of the surveillance.

PDGP – Four Rivers Nuclear Partnership, LLC, Paducah, KY – During the week of March 3, 2025, BFF personnel, along with staff from the EM NV contractor, participated in the surveillance of this waste generator. The surveillance was scheduled for DOE to verify programmatic and performance-based compliance to the NNSSWAC (DOE/NV--325-22-00). RWAP members completed checklists specific to the elements being evaluated by conducting interviews, reviewing procedures, and conducting field inspections. NDEP personnel were provided access to interviews, procedures, and field inspections when requested. No findings or observations were issued by EM NV as a result of this surveillance.

Audits:

TWPC – United Cleanup Oak Ridge, LLC (UCOR), Oak Ridge, TN - During the week of March 17, 2025, BFF personnel, along with staff from the EM NV contractor, participated in the audit of this waste generator. The audit was scheduled for DOE to verify programmatic and performance-based compliance with the NNSSWAC (DOE/NV--325-22-00). RWAP members completed checklists specific to the elements being evaluated by conducting interviews, reviewing procedures and conducting field inspections. NDEP personnel were provided access to interviews, procedures and field inspections when requested. No findings and one (1) observation was issued by EM NV as a result of the audit.

PORT – Fluor-BWXT Portsmouth, LLC, Piketon, OH – During the week of March 24, 2025, BFF personnel, along with staff from the EM NV contractor, participated in the audit of this waste generator. The audit was scheduled for DOE to verify programmatic and performance-based compliance with the NNSSWAC (DOE/NV--325-22-00). RWAP members completed checklists specific to the elements being evaluated by conducting interviews, reviewing procedures, and conducting field inspections. NDEP personnel were provided access to interviews, procedures, and

field inspections when requested. No findings and three (3) observations were issued by EM NV as a result of the audit.

5. Waste Management

Documents Reviewed/Letters Issued:

A Request to Transport Asbestos Waste for Disposal – Nevada National Security Site (NNSS): January 1, 2025, to December 31, 2025, was received on January 8, 2025. BFF issued a response on February 3, 2025.

A Nevada National Security Site (NNSS) Area 23 Solid Waste Disposal Site (SWDS) SW 13 097 04 Revision 8, Friable and Non-Friable Asbestos Summary Report, December 2024, was received on January 13, 2025. BFF issued a response on February 3, 2025.

A Nevada National Security Site (NNSS) Area 9 Solid Waste Disposal Site (SWDS) SW 13 097 03 Revision 14, Friable and Non-Friable Asbestos Report, December 2024, was received on January 13, 2025. BFF issued a response on February 3, 2025.

A Nevada National Security Site (NNSS) Area 5 Asbestos Waste Disposal Annual Report for Calendar Year (CY) 2024 for Permit HW0101, was received on January 14, 2025. BFF issued a response on February 3, 2025.

A Nevada National Security Site (NNSS) Area 5 Asbestos Waste Disposal Annual Report for Calendar Year (CY) 2024 for Permit SW532, was received on January 14, 2025. BFF issued a response on February 3, 2025.

A Nevada National Security Site (NNSS) Area 5 Asbestos Waste Disposal Report for Fourth Quarter Calendar Year (CY) 2024 for Permit HW0101, was received on January 14, 2025. BFF issued a response on February 3, 2025.

A Nevada National Security Site (NNSS) Area 5 Asbestos Waste Disposal Report for Fourth Quarter Calendar Year (CY) 2024 for Permit SW532, was received on January 14, 2025. BFF issued a response on February 4, 2025.

The Application for Modification of Resource Conservation and Recovery Act Permit NEV HW0101, EPA ID NV3890090001, Class 1 Resource Conservation and Recovery Act Subtitle C Site Identification Form Contact Information and Contingency Plan Update, was received on January 14, 2025. BFF issued a response approving the Class 1 modification on February 3, 2025. Additionally, BFF issued a letter to the Nye County Commissioners notifying them of the Class 1 modification on February 3, 2025.

The FY2024 Final RWAP Annual Report, was received on January 22, 2025. BFF issued a response on March 26, 2025.

An Area 6 Annual Solid Waste Disposal Site (SWDS) Report for the Nevada National Security Site (NNSS) January 1, 2024, Through December 31, 2024, was received on January 28, 2025. BFF issued a response on February 3, 2025.

An Area 9 Annual Solid Waste Disposal Site (SWDS) Report for the Nevada National Security Site (NNSS) - January 1, 2024, Through December 31, 2024, was received on January 28, 2025. BFF issued a response on February 3, 2025.

An Area 23 Semi-Annual Solid Waste Disposal Site (SWDS) Report for the Nevada National Security Site (NNSS) - July 1, 2024, Through December 31, 2024, was received on January 28, 2025. BFF issued a response on February 3, 2025.

A Request to Transport Asbestos Waste, was received on January 29, 2025. BFF issued a response on February 4, 2025.

A Rescinding Letter 12B5-AR-25-0018: Response to the Nevada Division of Environmental Protection Comment Regarding Request to Transport Asbestos Waste for Disposal – Nevada National Security Site (NNSS): January 1, 2025, Through December 31, 2025, was received on February 3, 2025. BFF issued a response on February 4, 2025.

A Request to Transport Asbestos Waste for Disposal – Nevada National Security Site (NNSS): January 1, 2025, Through December 31, 2025, was received on February 3, 2025. BFF issued a response on February 4, 2025.

An Area 6 Annual Solid Waste Disposal Site (SWDS) Report for the Nevada National Security Site (NNSS) - January 1, 2024, Through December 31, 2024, was received on February 5, 2025. BFF issued a response on February 6, 2025.

An Area 9 Annual Solid Waste Disposal Site (SWDS) Report for the Nevada National Security Site (NNSS) - January 1, 2024, Through December 31, 2024, was received on February 5, 2025. BFF issued a response on February 6, 2025.

A Nevada National Security Site (NNSS) Area 23 Solid Waste Disposal Site (SWDS) SW 13 097 04, Revision 8, Friable and Non-Friable Asbestos Summary Report, January 2025, was received on February 12, 2025. BFF issued a response on February 13, 2025.

A Nevada National Security Site (NNSS) Area 9 Solid Waste Disposal Site (SWDS) Permit SW 13 097 03, Revision 14, Friable and Non-Friable Asbestos Report, January 2025, was received on February 12, 2025. BFF issued a response on February 13, 2025.

An Annual Summary/Waste Minimization Report, Calendar Year 2024, Resource Conservation and Recovery Act Permit Number NEV HW0101, was received on February 26, 2025. BFF issued a response on February 27, 2025.

A Nevada National Security Site (NNSS) Annual Summary/Waste Minimization Report, Calendar Year 2024, Resource Conservation and Recovery Act (RCRA) Permit NEW HW0101, was received on March 5, 2025. BFF issued a response on March 14, 2025.

A Nevada National Security Site (NNSS) Area 9 Solid Waste Disposal Site (SWDS) Permit SW 13 097 03 Revision 14, Friable and Non-Friable Asbestos Summary Report, February 2025, was received on March 12, 2025. BFF issued a response on March 13, 2025.

A Nevada National Security Site (NNSS) Area 23 Solid Waste Disposal Site (SWDS) SW 13 097 04 Revision 8. Friable and Non-Friable Asbestos Summary Report, February 2025, was received on March 12, 2025. BFF issued a response on March 13, 2025.

The Quarter 1 Post-Closure Inspection Results for RCRA NEV HW0101 and SWDS SW 532 Permits, was received on March 25, 2025.

Site Visits/Inspections:

BFF staff visited the NNSS to participate in the First Quarter Post-Closure Inspections for RCRA Permit NEV HW0101 and SWDS SW532 on March 17-18, 2025.

Conference Calls/Meetings:

The BFF Supervisor attended the RCRA Permit Writers Call on January 7, 2025, February 4, 2025, and March 5, 2025.

The BFF Supervisor attended the RCRA Interpretive Network (RIN) meetings on February 5, 2025, and March 5, 2025.

The BFF Supervisor attended the Subpart X Workgroup Call on February 6, 2025.

6. Major Program Proposals

There was no activity in this category during this quarter.

7. Historic Preservation

Funding has been provided to the SHPO for historic reviews at DOE and/or the NNSS during the year.

8. Environmental Monitoring Program and Report

There was no activity in this category during this quarter.

9. Sampling

No sampling activities were conducted by the Bureau during this quarter.

10. Safe Drinking Water

Document Reviews and Site Inspections

The BFF was copied on the following BSDW reports submitted by NNSA/NFO contractors. BFF reviewed the reports referenced below, had no comments, and filed appropriately.

- a. January 2025 Coliform Results – NNSP PWS NV0000360 and Water Truck 84846
- b. NNSP PWS NV0000360 2024 4th Quarter Chlorine Residual Report
- c. December 2024 NNSP Water Hauling Coliform Results
- d. January 2025 NNSP Water Hauling Coliform Results
- e. January 2025 NNSP Coliform Results PWS NV0004098
- f. February 2025 NNSP Coliform Results PWS NV0000360, NV0004098 and Water Truck 84846
- g. February 2025 NNSP Water Hauler Coliform Results
- h. March 2025 NNSP Water Hauling Coliform Results
- i. March 2025 Coliform Results for NNSP Public Water Systems NV0000360, NV0004098, NV0004099, and Water Hauling Truck 84847

Meetings:

The quarterly water meeting was held on January 29, 2025.

The BFF Supervisor attended EA's PFAS Forensics Review on February 14, 2025.

The BFF Supervisor attended the NDEP PFAS Modeling Tool Presentation on March 7, 2025.

Fiscal Analysis:

Estimate of personnel resources used (FTE or hours)

The bureau of Federal Facilities is made up of a Bureau Chief, one supervisor, one subject matter expert (vacant for one-half the quarter), three technical staff (one vacant for the majority of the quarter) and an administrative assistant. The AIP grant funds activities for each of these individuals. For the quarter, that represents approximately 4.0 FTEs based on a review of grant-related activities.

Total expenditures for each task area

A total of approximately \$161,480.35 was spent during this quarter for AIP work. This most current figure available at this time includes operating, information services, and purchasing costs. It does not include personnel costs.

Comparison of estimate to budgeted expenses:

Expenses this quarter were within the legislatively approved spending limits.

Miscellaneous:

The chief, and in her absence the supervisor, participated in monthly NDEP Attorney General staff meetings, bi-weekly Division-Wide Chief's Staff Meetings and bi-weekly meetings with the Deputy Administrator either in person or via virtual meetings in January, February, and March 2025.

During this quarter, the bureau chief attended or participated virtually in: (1) numerous calls, meetings and/or webinars as a member of the NGA's Federal Facilities Task Force (FFTF), the State, Tribal, Government Working Group (STGWG), the Environmental Council of States (ECOS) and/or the Combined Intergovernmental Working Group (CIWG) Planning Committee; (2) two Nevada Site-Specific Advisory Board meetings; (3) regular bureau staff meetings and meetings with individual staff; (4) the quarterly Low-Level Waste Stakeholders meeting; (5) a number of meetings with various DOE staff on both FFACO and Waste topics.

Tribal Interaction – During several virtual and in-person meetings this quarter with the State, Tribal, Government Working Group, the bureau chief interacted with a number of Tribes throughout the United States who have ties to the actions of the Department of Energy.

Staff Training:

BFF staff completed the following training: 2025 KnowBe4 Security Awareness Training