

DATE: October 6, 2025

TO: Jennifer Carr, Administrator

FROM: Meghan Lyle, Chief, Bureau of Federal Facilities

SUBJECT: Quarterly Report: July 1, 2025 to September 30, 2025

FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

(FFACO) QUARTERLY REPORT

Background

The Federal Facility Agreement and Consent Order (FFACO) is a legal document by which the Nevada Division of Environmental Protection (NDEP) assures citizens of Nevada that the public's health and safety, as well as the environment, are protected in regards to the Nevada National Security Site (NNSS), parts of the Nevada Test and Training Range (NTTR), parts of the Tonopah Test Range (TTR), and the two Nevada Off-Sites, Central Nevada Test Area (CNTA) and Project Shoal Area (PSA). Nevada Off-Sites are a group of sites where underground nuclear tests occurred out of the boundaries of the NNSS.

The FFACO identifies sites of potential historic contamination that require corrective actions based on public health and environmental considerations on the NNSS, the NTTR, the TTR, CNTA, and PSA.

Industrial Sites Activity

At the end of September 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 114 – Area 25 Engine Maintenance, Assemble, and Disassembly (EMAD) Facility – On December 23, 2024, BFF received the Draft SAFER Plan for CAU 114: Area 25 EMAD Facility, NNSS, Nevada, Revision 1, December 2024. A response letter with comments was issued on May 8, 2025. On July 31, 2025, BFF received the *Final Streamlined Approach for Environmental Restoration (SAFER) Plan for Corrective Action Unit (CAU) 114: Area 25 EMAD Facility, Nevada National Security Site, Nevada,*

Revision 1, July 2025. A response letter approving the Final SAFER was issued on August 5, 2025.

CAU 572 – Test Cell C – On September 16, 2025, BFF staff received *EM Nevada (EM NV) Program's Application of Point of Generation Guidance at Federal Facility Agreement and Consent Order (FFACO) Site*. A response letter was issued on September 30, 2025.

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 July 10 and August 21, 2025.

On August 12, 2025, BFF chief and staff attended two meetings with the DOE EM NV. The first meeting was regarding data validation. The second meeting was to discuss waste at CAU 572: Test Cell C.

On September 11, 2025, BFF staff traveled to the NNSS to accompany the DOE EM NV and the Deference Threat Reduction Agency (DTRA) on a tour of the CAUs that DTRA are responsible for.

As the demolition of CAU 114: EMAD and CAU:572 Test Cell C progresses, BFF staff have observed the ongoing demolition activities to ensure regulatory compliance. This quarter's site visits occurred on July 9, July 21, August 6, August 14, August 20, and September 2, 2025.

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:

On May 20, 2025, BFF staff received the *Final Calendar Year (CY) 2024 Post-Closure Monitoring Letter Report, Revision 0, May 2025*. A response letter with comments was issued on June 10, 2025. On July 16, 2025, BFF received the *Submittal of the Final Calendar Year 2024 Post-Closure Monitoring Letter, Revision 1, July 2025*. A response letter accepting the document was issued on July 29, 2025.

On July 2, 2025, BFF received the *Draft Calendar Year 2024 Underground Test Area (UGTA) Annual Sampling Letter Report, NNSS, Nevada, Revision 0, July 2025*. A response letter with comments was

issued on July 30, 2025. On September 4, 2025, BFF staff received the *Submittal of the Final Calendar Year (CY) 2024 Underground Test Area (UGTA) Annual Sampling Letter Report, Nevada National Security Site, Nevada, Revision 1, September 2025*. A response letter accepting the document was issued on September 8, 2025.

On September 29, 2025, BFF received the *Request for Notice of Completion on Corrective Action Unit (CAU) 101: Central Pahute Mesa and CAU 102: Western Pahute Mesa Model Evaluation Data Presentation # 1 Milestones*. A notice of completion letter for the milestones was issued on September 30, 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 September 18, 2025. This quarters meeting was held at the same time as the Model Evaluation Presentation on September 18, 2025.

On September 18, 2025, BFF chief and staff attended the Model Evaluation Presentation #1 for CAUs 101 and 102: Central and Western Pahute Mesa.

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.

CAU 447: Project Shoal Area – BFF received the *Draft Postclosure Groundwater Monitoring and Inspection Report, Project Shoal Area: Subsurface Corrective Action Unit 447*, on May 28, 2025. BFF issued a comment response letter on June 26, 2025. BFF received responses to NDEP comments on the Draft Shoal 2024 Report on July 29, 2025. BFF accepted the comment responses on August 4, 2025.

Meetings and Site Visits:

On July 1, 2025, BFF supervisor and staff attended a meeting with DOE LM and their contractor to discuss and resolve comments regarding the *Draft 2024 Postclosure Groundwater Monitoring and Inspection Report, Project Shoal Area: Subsurface Corrective Action Unit 447*.

On September 9, 2025, BFF chief, staff, and a NDEP deputy administrator traveled to Fallon, Nevada to

attend the annual inspection and groundwater monitoring event at CAU 447: Project Shoal Area.

General FFACO Business:

Federal Facility Agreement and Consent Order (FFACO) – On July 7, 2025, BFF issued the *Notification of the Nevada Division of Environmental Protection, Bureau of Federal Facilities' Designated Federal Facility Agreement and Consent Order (FFACO) Agreement Coordinator and Corrective Action Coordinator*. On July 21, 2025, BFF issued an updated *Notification of the Nevada Division of Environmental Protection, Bureau of Federal Facilities' Designated Federal Facility Agreement and Consent Order (FFACO) Agreement Coordinator and Corrective Action Coordinator*.

Fiscal Year 2025 – 2026 Planned (FFACO) Milestones and Due Dates – On August 21, 2025, BFF staff received the *Distribution of Fiscal Year (FY) 2025+1 Milestone Chart and Listing of Modifications to the Federal Facility Agreement and Consent Order (FFACO)*. A response letter with comments was issued on August 29, 2025. On September 4, 2025, BFF staff received the *Response to Distribution of FY 2025+1 Milestone Chart and Listing of Modifications to the Federal Facility Agreement and Consent Order (FFACO)*.

Use Restriction Management Plan - On July 31, 2025, BFF staff received the *Draft Federal Facility Agreement and Consent Order (FFACO) Nevada National Security Site (NNSS) Use Restriction Management Plan, Revision 2, July 2025*. BFF issued a response letter on August 5, 2025. On September 3, 2025, BFF staff received the *Final Federal Facility Agreement and Consent Order (FFACO) Nevada National Security Site (NNSS) Use Restriction Management Plan (URMP), Revision 2, August 2025*. A response letter approving the document was issued on September 8, 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. On August 28, 2025, BFF received the *Transmittal of the Modification to the Federal Facility Agreement and Consent Order (FFACO)*.

On July 2, 2025, BFF chief, supervisor, and staff attended the FFACO Transition Meeting.

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 was completed at 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 July, August, and September 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 and staff 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 24 Hour HAZWOPER training.

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

Background

The Agreement in Principle (AIP) is a legal document by which the Nevada Division of Environmental Protection (NDEP) assures citizens of Nevada that the public's health and safety, as well as the environment, are protected in regards to the Nevada National Security Site (NNSS). Under the AIP, the Bureau of Federal Facilities (BFF) serves as the primary point of contact for environmental compliance matters for past and ongoing operations at the NNSS.

The BFF enforces environmental regulations at the NNSS through the issuance of permits to the owner of the NNSS, Department of Energy's (DOE's) National Nuclear Security Administration/Nevada Field Office (NNSA/NFO). The BFF issues Water Pollution Control Permits GNEV93001 and NEV96001, Resource Conservation and Recovery Act (RCRA) Permit NEV HW0101, and Solid Waste Permits SW 532, SW 13 097 02, SW 13 097 03, and SW 13 097 04. The BFF also regulates Safe Drinking Water Permits NV0000360, NV0004098, and NV0004099.

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, April 1, 2025, Through June 30, 2025*, on July 28, 2025. BFF staff reviewed the report and issued a response letter to the National Nuclear Security Administration/Nevada Field Office (NNSA/NFO) on August 4, 2025, acknowledging the limits set forth in the permit had been met for the quarter.

On June 17, 2025, the BFF supervisor and staff traveled to the NNSS to conduct the annual inspection for Water Pollution Control Permit GNEV93001. The inspection report was issued on July 30, 2025.

On July 7, 2025, BFF staff received the *Notification of Activities of U1A Sewage Pond, NNSS Water Pollution Control Permit GNEV93001, June 23, 2025*. A response letter acknowledging activation of the U1A Sewage Pond was issued on July 28, 2025.

On September 4, 2025, BFF staff received the *Waiver Request for Nevada National Security Site – DAF Wastewater Pond, Water Pollution Control Permit GNEV93001*. A response letter approving the waiver was issued on September 30, 2025.

Water Pollution Control Permit NEV96021 – BFF staff received the *E-Tunnel Wastewater Discharge Permit Quarterly Monitoring Report for Second Quarter of Calendar Year 2025* on

July 22, 2025. BFF staff reviewed the report and issued a response letter to the NNSA/NFO on July 30, 2025, acknowledging the limits set forth in the permit had been met for the quarter.

On June 17, 2025, the BFF supervisor and staff traveled to the NNSS to conduct the annual inspection for Water Pollution Control Permit NEV96021. The inspection report was issued on July 30, 2025.

Spill Report #250728-05 – On July 28, 2025, BFF staff received the *Nevada Division of Environmental Protection Spill Report #250728-05*. BFF issued a letter requesting additional information and sampling results on August 4, 2025. On September 4, 2025, BFF staff received the *Nevada Division of Environmental Protection Spill Number 250728-05 Report*. BFF issued a response letter requesting additional information when all sampling results were complete on September 16, 2025.

Spill Report #250822-03 – On August 22, 2025, BFF staff received the *Nevada Division of Environmental Protection Spill Report #250822-03*. BFF staff issued a letter requesting additional information and sampling results on September 3, 2025.

Meetings and Site Visits:

The quarterly water meeting was held on August 13, 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 April, May, and June 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 Radioactive Waste Acceptance Program (RWAP) Audit of Pantex Plant (Pantex) Waste Certification Program (WCP), Audit No. ADT-25-010-AMHP, was received on July 7, 2025.

The Idaho National Laboratory – Battelle Energy Alliance (INL-BEA) Waste Certification Program (WCP) Surveillance Report, SRV-25-010-NEID, was received on July 7, 2025.

The Cancelled Environmental Management (EM) Nevada Program Audit of Navarro Research and Engineering, Inc. Waste Certification Program (WCP), No. A-3433, was received on July 9, 2025.

The Closure of Finding FP2-24-008-NFSI Nuclear Fuel Services (NFS), was received on July 29, 2025.

The Closure of Issues from Audit ADT-24-007-WVDP, West Valley Demonstration Project (WVDP), was received on August 13, 2025.

The Idaho Cleanup Project (ICP) Waste Certification Program (WCP) Surveillance Report, SRV-25-022-INEL, was received on August 20, 2025.

The U.S. Army Aberdeen Proving Ground (APG) Waste Certification Program (WCP) Surveillance Report, SRV-25-011-USAA, was received on August 20, 2025.

The Closure of Finding FP2-25-001-DUF6 and Observations OBS-25-001-DUF6 and OBS-25-002-DUF6 for the Depleted Uranium Hexafluoride (DUF6) Conversion Services Project – Audit ADT-25-003-DUF6, was received on August 20, 2025.

The Nuclear Fuel Services (NFS) Waste Certification Program (WCP) Surveillance Report, SRV-25-009-NFSI, was received on August 25, 2025.

The Nevada Environmental Program Services (NEPS) Waste Certification Project (WCP) Audit Report, A-3546, was received on September 10, 2025.

The Closure of Finding FP2-25-007-LANL for Los Alamos National Laboratory (LANL), was received on September 11, 2025.

The Advanced Mixed Waste Treatment Project (AWMTP) Waste Certification Program (WCP) Audit Report, ADT-25-008-AMWP, was received on September 17, 2025.

The Navarro Research and Engineering, Inc. Environmental Program Services, Waste Certification Project Audit Report No. A-3546, was received on September 19, 2025.

Profiles Reviewed:

BFF staff reviewed a total of thirty (30) waste profiles this quarter. Twenty-four (24) 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. Two (2) profiles were non-radioactive, hazardous classified waste. One (1) profile was a non-radioactive, nonhazardous classified waste.

Meetings:

BFF staff participated in DOE's quarterly LLW Stakeholder's Meeting on August 13, 2025, in Pahrump, NV.

Waste Generator Suspensions:

There is currently zero (0) waste generator suspensions.

Active Profiles:

There are currently 214 active profiles, comprised of 52 Mixed LLW/Hazardous non-rad profiles, 27 LLW/Non-Rad Solid Waste profiles and 135 LLW profiles.

Suspended Profiles:

There are currently zero (0) profiles under suspension.

Site Visits/Radioactive Waste Generator Facility Evaluations:

The Radioactive Waste Acceptance Program (RWAP) conducted four (4) surveillances, two (2) audits, and no split sampling events this quarter. NDEP participated in three (3) surveillances, and two (2) audits this quarter as described in the sections below.

Surveillances:

NFSI – Nuclear Fuel Services (NFS), Erwin, TN – During the week of August 25, 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 NNSSWAV (DOE/NV--325-22-00). RWAP members completed checklists specific to the elements being evaluated by conducting interviews, reviewing procedures, and field inspections when requested. No findings and one (1) observation was issued by EM NV as a result of this surveillance.

WVDP – CH2M Hill BWXT West Valley, LLC (WVDP), West Valley, NY – During the week of August 25, 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 NNSSWAV (DOE/NV--325-22-00). RWAP members completed checklists specific to the elements being evaluated by conducting interviews, reviewing procedures, and field inspections when requested. No findings and no observations were issued by EM NV as a result of this surveillance.

PERM- Perma Fix Northwest (PFNW) Richland, WA – During the week of September 22, 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 NSSWAC (DOE/NV 325 22 00). RWAP members completed checklist specific to the elements being evaluated by conducting interviews, reviewing procedures, and field inspections when requested. No findings and one (1) observation was issued by EM NV as a result of this surveillance.

Audits:

AWMP – Idaho Environmental Coalition (AMWTP), Idaho Falls, ID – During the week of July 28, 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 field inspections when requested. No findings and no observations were issued by EM NV as a result of this audit.

AMHP – PanTeXas Deterrence, LLC (Pantex Plant), Amarillo, TX – During the week of September 22, 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 field inspections when requested. Two (2) findings and no observations were issued by EM NV as a result of this audit.

5. Waste Management

Documents Reviewed/Letters Issued:

The Recertification for Conditional Exclusion for Chromium Dated May 8, 2019, was received on May 29, 2025. BFF issued a response on July 3, 2025.

The Nevada National Security Site (NNSS) Quarterly Hazardous Waste Volume Report and Fee: Second Quarter Calendar Year 2025, was received on July 7, 2025.

The Nevada National Security Site (NNSS) Area 5 Asbestos Waste Disposal Report for Second Quarter of Calendar Year (CY) 2025 for Permit SW532, was received on July 9, 2025. BFF issued a response on July 28, 2025.

The Nevada National Security Site (NNSS) Area 5 Asbestos Waste Disposal Report for Second Quarter of Calendar Year (CY) 2025 for Permit HW0101, was received on July 9, 2025. BFF issued a response on July 28, 2025.

A Notification of Potential Mischaracterization of Universal Waste and Shipment to Area 9 Solid Waste Disposal Site (SWDS), was received on July 10, 2025. BFF issued a response on August 28, 2025.

An Area 9 Solid Waste Disposal Site Permit #SW 13 097 03 Revision 14 Permit Incident Report, was received on July 10, 2025. BFF issued a response on August 28, 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, June 2025, was received on July 14, 2025. BFF issued a response on July 28, 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, June 2025, was received on July 14, 2025. BFF issued a response on July 28, 2025.

An Area 23 Semi-Annual Solid Waste Disposal Site (SWDS) Report for the Nevada National Security Site (NNSS) - January 1, 2025 Through June 30, 2025, was received on July 29, 2025. BFF issued a response on August 6, 2025

An Updated Request to Transport Asbestos was received on August 4, 2025. BFF issued a response on August 6, 2025.

The Nevada National Security Site (NNSS) Area 23 Solid Waste Disposal Site (SWDS) Permit SW 13 097 04 Revision 8, Friable and Non-Friable Asbestos Summary Report, July 2025, was received on August 14, 2025. BFF issued a response on August 18, 2025.

The 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, July 2025 was received on August 14, 2025. BFF issued a response August 18, 2025.

A Class 1 Modification of Resource Conservation and Recovery Act Hazardous Waste Permit NEV HW0101, was received on August 14, 2025. BFF issued a response on August 22, 2025.

A Hazardous Waste Storage Unit (HWSU) One-Year Storage Limitation Extension Request; Nevada National Security Site (NNSS), Resource Conservation and Recovery Act (RCRA) Permit NEV HW0101, was received on August 27, 2025. BFF issued a response on September 3, 2025.

A Resource Conservation and Recovery Act (RCRA) Universal Waste One-Year Storage Accumulation Extension Request; Nevada National Security Site (NNSS), was received on August 27, 2025. BFF issued a response on September 3, 2025.

The Nevada National Security Site (NNSS) Area 23 Solid Waste Disposal Site (SWDS) Permit SW 13 097 04 Revision 8, Friable and Non-Friable Asbestos Summary Report, August 2025, was received on September 15, 2025. BFF issued a response on September 16, 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, August 2025, was received on September 15, 2025. BFF issued a response on September 16, 2025.

Site Visits/Inspections:

Solid Waste Disposal Site (SWDS) Area 9, Permit SW 13 097 03 Annual Inspection – BFF staff conducted the annual Compliance Evaluation Inspection for the Area 9 Class III Solid Waste Disposal Site Permit No. SW 13 097 03 on July 17, 2025, with MSTs and NNSA/NFO personnel in attendance. BFF staff requested, through a letter dated June 16, 2025, required documentation (Bill of Lading/Load Verification documentation, Landfill Daily Access Registers, Inspection Checklists, and Training Records) to prepare for the inspection. The requested records were received and reviewed by BFF staff prior to the July 17, 2025, inspection. BFF issued the *2025 Annual Solid Waste Disposal Site Compliance Evaluation Inspection at the Nevada National Security Site Report – Area 9, Permit SW 13 097 03*, on August 7, 2025.

Solid Waste Disposal Site (SWDS) Area 6, Permit SW 13 097 02 Annual Inspection – BFF staff conducted the annual Compliance Evaluation Inspection for the Area 6 Class III Solid Waste Disposal Site Permit No. SW 13 097 02 on July 17, 2025, with MSTs and NNSA/NFO personnel in attendance. BFF staff requested, through a letter dated June 16, 2025, required documentation (Bill of Lading/Load Verification documentation, Landfill Daily Access Registers, Inspection Checklist, and Training Records) to prepare for the inspection. The requested records were received and reviewed by BFF staff prior to the July 17, 2025, inspection. BFF issued the *2025 Annual Solid Waste Disposal Site Compliance Evaluation Inspection at the Nevada National Security Site Report- Area 6 Permit No. SW 13 097 02*, on August 6, 2025.

Solid Waste Disposal Site (SWDS) Area 5, Permit SW 532 Annual Inspection – BFF staff conducted the annual Compliance Evaluation Inspection for the Area 5 Solid Waste Disposal Site Permit No. SW 532 on August 11, 2025, with MSTs and NNSA/NFO personnel in attendance. BFF staff requested, through a letter dated June 18, 2025, required documentation (daily/weekly/monthly Inspection Checklists, Training Records and Real Time Radiography) to prepare for the inspection. The requested records were received and reviewed by BFF staff prior to the August 11, 2025, inspection. BFF issued the *2025 Annual Solid Waste Disposal Site Compliance Evaluation Inspection at the Nevada National Security Site Report – Area 5, Permit SW 532*, on August 18, 2025.

Solid Waste Disposal Site (SWDS) Area 23, Permit SW 13 097 04 Annual Inspection – BFF staff conducted the annual Compliance Evaluation Inspection for the Area 23 Class II Solid Waste Disposal Site, operating under Permit No. SW 13 097 04 on August 11, 2025, with MSTs and NNSA/NFO personnel in attendance. BFF staff requested, through a letter dated June 16, 2025, required documentation (Bill of Lading/Load Verification documentation, Landfill Daily Access Registers, Inspection Checklist, and Training Records) to prepare for the inspection. The requested records were received and reviewed by BFF staff prior to the August 11, 2025, inspection. BFF issued the *2025 Annual Solid Waste Disposal Site Compliance Evaluation Inspection at the Nevada National Security Site Report- Area 23, Permit No. 13 097 04*, on August 21, 2025.

Resource Conservation and Recovery Act (RCRA) Permit NEV HW0101 Annual Inspection – BFF issued the *2025 Annual Compliance Evaluation Inspection for RCRA Permit NEV HW0101 at the Nevada National Security Site by the Nevada Division of Environmental Protection*, on

September 19, 2025. The annual inspection of RCRA Permit NEV HW0101 will be conducted next quarter.

BFF staff visited the NNSS to observe waste disposal activities at the Area 9 U10C SWDS on August 14, August 21, September 4, September 11, and September 18, 2025.

On August 19, 2025, BFF chief and staff visited G-Tunnel to view the entire process of waste generation to disposal at the Area 9 U10C SWDS.

BFF staff visited the NNSS to observe the results of the Third Quarter Post-Closure Inspections for RCRA Permit NEV HW0101 and SWDS SW 532 on September 30, 2025.

Conference Calls/Meetings:

The BFF chief and staff attended the RCRA Permit Writers Call on July 1, 2025, and August 5, 2025.

The BFF supervisor attended the RCRA Interpretive Network (RIN) meetings on July 2, 2025, and September 3, 2025.

BFF staff met with personnel from MSTs and NNSA/NFO to discuss the Area 9 U10C Permit Incident Report on August 14, 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. June 2025 Coliform Results for NNS Public Water Systems NV0000360, NV0004098, NV0004099, and Water Hauling Trucks 84846 and 84847
- b. June 2025 NNS Water Hauling Coliform Results
- c. Second Quarter Disinfectant Residual for Public Water System NV0000360
- d. 2025 NNS Monitoring Assessment Plan – PWS NV0000360, NV0004098, NV0004099 Secondary IOCs, SOCs, Nitrate
- e. 2025 NNS Monitoring Assessment Plan – PWS NV0000360, NV0004098, NV0004099 Secondary IOCs, VOCs, Cyanide, Fluoride, Nitrate
- f. Monitoring Assessment Plan 2025 NNS PWS NV0000360 Lead and Copper Samples
- g. NNS PWS NV0000360 Lead and Copper Results
- h. July 2025 Coliform Results for NNS Public Water Systems NV0000360, NV0004098, and Water Hauling Truck 84847
- i. July 2025 Water Hauling Coliform Results for NNS Water Hauler Trucks 84846 and 84847
- j. August 2025 Coliform Results for NNS Public Water Systems NV0000360, NV0004098, and Water Hauling Truck 84847
- k. August 2025 NNS Water Hauling Coliform Results

BFF issued the *2025 Annual Compliance Evaluation Inspection for Water Hauler 84846 and Water Hauler 84847 at the Nevada National Security Site by the Nevada Division of Environmental Protection* on May 22, 2025. BFF conducted the annual Water Hauler inspections on July 17, 2025, for Water Haulers 84846 and 84847. On July 21, 2025, BFF issued the *2025 Annual Inspections of Water Hauler 84846 and Water Hauler 84847 at the Nevada National Security Site (NNS)*.

On August 29, 2025, BFF issued the *2025 Sanitary Survey for Safe Drinking Water Permits PWS NV0000360, PWS NV0004098, PWS NV0004099 at the Nevada National Security Site by the Nevada Division of Environmental Protection*. The sanitary survey will be conducted next quarter.

Meetings:

The quarterly water meeting was held on August 13, 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, three technical staff, 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 \$140,643.00 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 July, August, and September 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 and staff 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:

- 24 Hour HAZWOPER

