



ESHID-601002

Environment Safety & Health
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National Nuclear Security Administration
Los Alamos Field Office, A316
3747 West Jemez Road
Los Alamos, New Mexico, 87545
(505) 667-5105/Fax (505) 667-5948

Date: **NOV 10 2015**
Symbol: ADESH-15-162
LA-UR: Not Applicable
Locates Action No.: Not Applicable

Mr. Ryan Flynn
Cabinet Secretary
New Mexico Environment Department
Harold L. Runnels Building
1190 St. Frances Drive, Suite N4050
Santa Fe, New Mexico 87505

Dear Secretary Flynn:

Subject: Characterization Conclusions, Extent of Condition Review Reporting, Los Alamos National Laboratory

In a letter (DIR-15-127) to the New Mexico Environment Department (NMED) dated August 31, 2015, the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), the Permittees, reported noncompliance self-disclosures that were discovered during a Permittee-conducted Extent of Condition Review. The self-disclosure report included a description of a subset of the LA-CIN01 waste stream that included liquids. The Permittees conservatively labeled the liquid-containing drums with Environmental Protection Agency Hazardous Waste Numbers (EPA HWN) D001 (ignitability) and D002 (corrosivity). Section 4.D. of the self-disclosure report included a description of this portion of the waste stream and outlined the sampling and testing that the Permittees intended to conduct to confirm this characterization.

The Permittees have completed a set of testing that has confirmed the applicability of EPA HWN D001 and D002 characteristics for the subset of the LA-CIN01 waste stream that contain liquids. These results will be described and transmitted in a separate submittal. Based upon these test results, the Permittees will continue to manage this waste as described in the August 31, 2015 self-disclosure report with the EPA HWN D001 and D002 as appropriate.

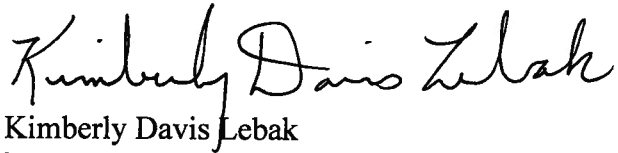
The Permittees will schedule a meeting with members of your staff to describe in more detail the analytical tests and the results that supported this conclusion. If you have questions, please contact Mark Haagenstad (LANS) at (505) 665-2014 or Dave Nickless (DOE) at (505) 665-6448.

Sincerely,



Michael T. Brandt, DrPH, CIH
Associate Director
Environment, Safety & Health

Sincerely,



Kimberly Davis Lebak
Manager
Los Alamos Field Office
U.S. Department of Energy

MTB:KBL/

Enclosures: (1) Certification Statement

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Mr. Ryan Flynn
ADESH-15-162

- 3 -

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NOV 10 2015

NMED
Hazardous Waste Bureau

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ENCLOSURE 1

Certification Statement

ADESH-15-162

Date: NOV 10 2015

CERTIFICATION

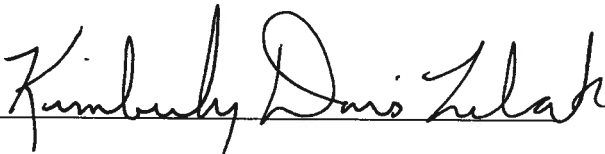
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage 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.



Alison M. Dorries
Division Leader
Environmental Protection Division
Los Alamos National Laboratory
Operator

11/2/15

Date Signed



Kimberly Davis Lebak
Manager, Los Alamos Field Office
National Nuclear Security Administration
U.S. Department of Energy
Owner/Operator

11/9/15

Date Signed