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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: Request for Extension to Respond to NMED 2015 Annual Compliance Inspection
Los Alamos National Laboratories EPA ID# NM0890010515**

On June 1, 2016, the New Mexico Environment Department (NMED) issued a Notice of Violation (NOV) to the Los Alamos National Laboratory (LANL) based on the 2015 Compliance Evaluation Inspection (CEI). The NOV alleged twelve (12) violations of the New Mexico Hazardous Waste Management Regulations (20.4.1 NMAC) and LANL's RCRA Hazardous Waste Operating Permit (Permit). The U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), or Permittees, received this NOV on June 1, 2016. Within thirty (30) days from receipt of the NOV, LANL is required to provide "a written description of actions taken to address the violations and a schedule for implementation of corrective actions not yet completed." The Permittees received the NOV on June 1, 2016, and therefore, this written response is required to be filed on or before July 1, 2016. For the reasons set forth below, the Permittees respectfully requests a 30-day extension of time until July 29, 2016 in which to provide this response.

After issuance of the NOV, the Permittees commenced a careful review of the alleged violations and associated penalties as necessary to meet the July 1st deadline. However, these efforts were diverted due to NMED's 2016 Annual CEI which commenced the week of June 13th. As a result of the 2016 inspection, key personnel were unable to assist in evaluating the allegations and corrective action as needed to develop responses to the June 1, 2016 NOV. In addition, after issuance of the NOV, the Permittees requested copies of the penalty calculation worksheets and accompanying narratives as necessary to evaluate the underlying basis for the penalty calculations pursuant to the NMED's 2007 Penalty Policy. Although NMED provided copies of the penalty calculation worksheets, LANL has not received copies of the accompanying narrative

explanation supporting the worksheet. The narrative worksheet, in turn, is important to evaluate and incorporate, as appropriate, into the Permittees' response. Finally, the additional time would allow the Permittees sufficient time to meet administrative requirements associated with reviewing and processing formal responses.

Sincerely,



Anthony R. Grieggs
Group Leader
Environmental Compliance Programs
Los Alamos National Security, LLC

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