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Cabinet Secretary

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Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

March 8, 2017

Karen Armijo
Permitting and Compliance Manager
Los Alamos Field Office
3747 West Jemez Road, MS A316
Los Alamos, NM 87544

John Bretzke
Division Director
Environmental Protection and Compliance Division
Los Alamos National Laboratory
P.O. Box 1663, MS-K491
Los Alamos, NM 87545

**RE: APPROVAL REQUEST FOR 365-DAY EXTENSION OF ALTERNATIVE
INSPECTION REQUIREMENTS FOR SHED 1028 AT TECHNICAL
AREA 54, AREA G, PAD 5
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-MISC**

Dear Ms. Armijo and Mr. Bretzke:

The New Mexico Environment Department (Department) has received from the United States Department of Energy and Los Alamos National Security, LLC, (collectively, the Permittees) a *Request for Extension of Alternative Inspection Requirements for Shed 1028 at Technical Area 54, Area G, Pad 5* and referenced by EPC-DO-17-117 and LA-UR-17-21644 dated March 8, 2017 and received March 8, 2017.

On September 16, 2016, the Permittees notified the Department by phone and electronic mail (email) of the need for an alternative inspection requirement four mixed low level waste Flanged Tritium Waste Containers (FWTC) (i.e., C09203611, C09203612, C09203613, and C09203614) stored within a portion of the permitted unit at Technical Area (TA) 54. The requested alternative inspection would involve a visual inspection of the building TA-54-1028 rather than inspection of the waste containers as required by the Los Alamos National Laboratory Hazardous Waste Facility Permit Section 2.6.

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On September 16, 2016, the Department approved of the Permittee's extension request for 30 calendar days. Subsequently, on October 13, 2016, the Permittees requested an additional 60-day extension; which was approved by the Department on October 19, 2016, with the requirement that the Permittees summarize these events in a formal submittal to the Department. The formal submittal summarizing these events was submitted to the Department on November 6, 2016. On December 6, 2016, the Permittees requested an additional 90-day extension which was approved by the Department on December 8, 2016.

Following the 90-extension, the Permittees submitted a *Request for Extension of Alternative Inspection Requirements for Shed 1028 at Technical Area 54, Area G, Pad 5* (EPC-DO-17-117/LA-UR-17-21644), which was received by the Department on March 8, 2017; requesting an additional 365 days to continue with the current alternative inspection as well as develop a remediation/recovery plan for the waste in FTWC stored within TA-54-1028. The Permittees state that they will document the efforts to date in a baseline quarterly report.

The Department hereby grants the 365-day extension request for alternate inspections. The baseline report must be submitted to the Department by **April 7, 2017**, and quarterly updated reports must be submitted by July 7, 2017, October 6, 2017, and January 8, 2018. The Permittees must continue to document these alternative inspections on the Inspection Record Form.

Please contact Siona Briley of my staff at 505-476-6049 should you have any questions.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc:

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File: 2017 Reading, LANL Ext Request for Alternative Inspection for Technical Area 54, Area G, Pad 5, Shed 1028

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