



Environment Safety & Health Directorate Los Alamos National Laboratory PO Box 1663, K491 Los Alamos, New Mexico 87545 (505) 667-4218

National Nuclear Security Administration Los Alamos Field Office 3747 West Jemez Road, A316 Los Alamos, New Mexico, 87544 (505) 667-5105/Fax (505) 667-5948

Date:

JAN 1 9 2018

Symbol: ADESH: 18-003

LA-UR:

17-31359

Locates Action No.: N/A

Mr. John E. Kieling, Chief Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505-6303

Subject:

Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report

for Period Ending January 22, 2018

Dear Mr. Kieling:

This Semi-annual Report is submitted as required by Attachment A to the Settlement Agreement and Stipulated Final Order HWB-14-20 (SFO) entered into by the New Mexico Environment Department (NMED) (Complainant) and the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (Respondents) on January 22, 2016. Many of the Ordered Actions in SFO Attachment A make reference to specific procedures. Wherever procedures are referenced in Attachment A under the column "Documentation to Provide as Evidence of Completion," the following requirement is found:

Provide periodic [Semi-annually, or upon NMED request] listing of document(s) revisions.

It was agreed that the Respondents would provide the required document list on January 22 and July 22 of each year. Enclosure 1 lists all procedures revised since they were initially submitted to NMED as part of the Ordered Action responses, along with the effective dates of any revisions. As stated in Attachment A, electronic access to any and all current document revisions will be provided upon NMED request.

Mr. John E. Kieling ADESH: 18-003

The Respondents would be pleased to meet with NMED-HWB personnel to discuss and explain the documentation included herein. If you have comments or questions regarding this submittal, please contact Mark P. Haagenstad (LANS) at (505) 665-2014 or Karen E. Armijo (DOE) at (505) 665-7314.

Sincerely,

Sincerely,

Michael T. Brandt, DrPH, CIH

Associate Director

William S. Goodrum

Manager

MTB/WSG/MPH/SDG:am

Enclosure(s)

1) Attachment A Settlement Agreement and Stipulated Final Order HWB-14-20, Semi Annual Report for Period Ending January 22, 2018

Copy: Butch Tongate, NMED, Santa Fe, NM, (E-File)

Siona Briley, NMED/HWB, Santa Fe, NM, (E-File)

Neelam Dhawan, NMED/HWB, Santa Fe, NM, (E-File)

Paul Holland, LASO-NS-LP, (E-File)

Peter Maggiore, NA-LA, (E-File)

Jody M. Pugh, NA-LA (E-File)

Karen E. Armijo, NA-LA, (E-File)

Darlene S. Rodriguez, NA-LA, (E-File)

Silas Deroma, NA-LA, (E-File)

Douglas E. Hintze, EM-LA, (E-File)

Ben Underwood, EM-LA, (E-File)

Sara Ann Mason, EM-LA, (E-File)

David Nickless, EM-WM, (E-File)

Craig S. Leasure, PADOPS, (E-File)

William R. Mairson, PADOPS, (E-File)

Randall M. Erickson, ADEM, (E-File)

David Funk, ADEM, (E-File)

Enrique Torres, ADEM, (E-File)

Cheryl D. Cabbil, ADNHHO, (E-File)

John C. Bretzke, ADESH, (E-File)

Tina M. Sandoval, DSESH, (E-File)

Benjamin B. Roberts, EPC-DO, (E-File)

Copy (cont):

Mr. John E. Kieling ADESH: 18-003

Deborah Woitte, LC-ESH, (E-File)
Susan McMichael, LC-ESH, (E-File)
Deborah L. Guffee, SI-DC, (E-File)
Yvette S. Branch, SI-DC, (E-File)
Shanon D. Goldberg, EPC-CP, (E-File)
Mark P. Haagenstad, EPC-CP, (E-File)
Ellena I. Martinez, EPC-CP, (E-File)
emla.docs@em.doe.gov, (E-File)
locatesteam@lanl.gov, (E-File)
epc-correspondence@lanl.gov, (E-File)
rcra-prr@lanl.gov, (E-File)
epccat@lanl.gov, (E-File)
adesh-correspondence@lanl.gov, (E-File)
adesh-records@lanl.gov, (E-File)







Environment Safety & Health Directorate Los Alamos National Laboratory PO Box 1663, K491 Los Alamos, New Mexico 87545 (505) 667-4218

National Nuclear Security Administration Los Alamos Field Office 3747 West Jemez Road, A316 Los Alamos, New Mexico, 87544 (505) 667-5105/Fax (505) 667-5948



JAN 1 9 2018 Date:

Symbol: ADESH: 18-003

LA-UR: 17-31359

Locates Action No.:

N/A

Mr. John E. Kieling, Chief Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505-6303

Subject:

Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending January 22, 2018

Dear Mr. Kieling:

This Semi-annual Report is submitted as required by Attachment A to the Settlement Agreement and Stipulated Final Order HWB-14-20 (SFO) entered into by the New Mexico Environment Department (NMED) (Complainant) and the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (Respondents) on January 22, 2016. Many of the Ordered Actions in SFO Attachment A make reference to specific procedures. Wherever procedures are referenced in Attachment A under the column "Documentation to Provide as Evidence of Completion," the following requirement is found:

Provide periodic [Semi-annually, or upon NMED request] listing of document(s) revisions.

It was agreed that the Respondents would provide the required document list on January 22 and July 22 of each year. Enclosure 1 lists all procedures revised since they were initially submitted to NMED as part of the Ordered Action responses, along with the effective dates of any revisions. As stated in Attachment A, electronic access to any and all current document revisions will be provided upon NMED request.



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.

Michael T. Brandt, DrPH, CIH

Associate Director

Environment, Safety, and Health

Los Alamos National Security, LLC

Los Alamos National Laboratory

Operator

William S. Goodrum

Manager

Los Alamos Field Office

U.S. Department of Energy

Owner/Operator

1/18/18 Date Signed

/~/&'/\leftstart

Date Signed

ENCLOSURE 1

Settlement Agreement and Stipulated Final Order
HWB-14-20, Semi-Annual Report for Period Ending
January 22, 2018

ADESH: 18-003

LA-UR-17-31359

Date: ____JAN 1 9 2018

Enclosure 1

Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending January 22, 2018

List of Documents in SFO Attachment A Subject to the Semi-annual Reporting Requirement

Action required (per SFO Attachment A):

"Provide periodic [Semi-annually, or upon NMED request] listing of document(s) revisions. When due:

January 22 and July 22 of each year until requirement expires.

List of Documents Affected:

Document Title	Version Submitted With 3/22/2016 Ordered Action	Revisions and Effective Date* Since Submittal
Ordered Action 1.12		
ENV-CP-QP-115, Compliance Technical Assistance Program (CTAP) Procedure	R0, 09/28/2015	None
ADESH-AP-TOOL-803, Facility TSF Operating Record	R0, 12/15/2015	R1, 08/11/17
EWMO-AP-20284, EWMO RCRA Permit Operating Record and Compliance Programs	R0, 03/08/2016	None
Ordered Action 1.13		
ADESH-AP-TOOL-117, Using WCATS to Submit Change Requests	R0, 02/08/2016	None
Ordered Action 1.14		
ENV-CP-AP-200, Regulatory Procedure Review of Waste Management Procedures superseded by ADESH-AP-014, Regulatory Review for Waste Management Compliance Work Control Documents	R1, 09/15/2015	R0, 11/02/2017
Ordered Action 1.16		
P850, Subcontract Technical Representative Procedure	Not submitted	R6, 11/7/2016
Ordered Action 5		
MAN-5004, WCATS User's Manual	R3, 07/16/2015	None

^{* &}quot;None" indicates that this document has not been revised since the current revision was submitted to NMED as part of the Ordered Action response on March 22, 2016.

Document Title	Version Submitted With 3/22/2016 Ordered Action	Revisions and Effective Date* Since Submittal
Ordered Action 5 Continued		
WM-SVS-AP-201, Reviewing and Approving Waste Stream Profiles (WSPs) in WCATS	R0, 04/30/2015	None
Ordered Action 9		
P409, LANL Waste Management	R5, 07/30/2015	R6, 04/21/2017, R7 11/29/2017
P315, Conduct of Operations Manual	R6, 07/08/2015	R6, Admin Change 1, 06/13/2017
P300, Integrated Work Management	R7, 12/09/2015	R8, 06/16/2016; R9, 07/10/2017
EP-AP-10007, ADEP Technical Procedure Development	R0, 08/13/2015	R2, 11/21/2016, R2.1 07/11/2017
ENV-CP-AP-200, R1, Regulatory Procedure Review of Waste Management Procedures superseded by ADESH-AP-014, Regulatory Review for Waste Management Compliance Work Control Documents	R1, 09/15/2015	R0, 11/02/2017
EM-AP-10001, ADEP Document Control (Rev. 0, formerly EP-AP-10001)	R0, 08/13/2015	R1, 02/01/2017
WM-AP-0005, Waste Characterization and Processing Review	R1, 02/18/2016	None
ADESH-IG-TOOL-101, Waste Management Glossary	R0, 12/10/2015	None
ADESH-AP-TOOL-111, Waste Characterization	R0, 12/15/2015	None
ADESH-AP-TOOL-115, Waste Compatibility Determination	R0, 01/14/2016	None
ADESH-AP-TOOL-206, Management of Hazardous Waste by Generators	R0, 12/15/2015	None
ADESH-AP-TOOL-300, Radioactive Waste Management	R0, 02/08/2016	R1, 06/12/2017
ADESH-AP-TOOL-314, Radioactive Characterization of Waste	R0, 02/10/2016	None
ADESH-AP-TOOL-803, Facility TSF Operating Record	R0, 12/15/2015	R1, 08/11/2017

_

^{* &}quot;None" indicates that this document has not been revised since the current revision was submitted to NMED as part of the Ordered Action response on March 22, 2016.

Document Title	Version Submitted With 3/22/2016 Ordered Action	Revisions and Effective Date* Since Submittal
ADESH-AP-TOOL-810, Waste Processing at LANL Hazardous Waste Permitted Units	R0, 01/14/2016	None
ADESH-AP-TOOL-901, Elementary Neutralization	R0, 01/14/2016	None
ADESH-AP-TOOL-902, Sorption without a Permit	R0, 12/23/2015	None
ADESH-AP-TOOL-906, Treatment by the Waste Generator	R0, 02/24/2016	None

 $^{^{*}}$ "None" indicates that this document has not been revised since the current revision was submitted to NMED as part of the Ordered Action response on March 22, 2016.