



ESHID-602887

**Environmental Protection & Compliance Division**  
**Los Alamos National Laboratory**  
PO Box 1663, K491  
Los Alamos, New Mexico 87545  
(505) 667-2211

**National Nuclear Security Administration**  
**Los Alamos Field Office**  
3747 West Jemez Road, A316  
Los Alamos, New Mexico 87544  
(505) 665-7314/Fax (505) 667-5948

**FEB 08 2018**

*Date:*  
*Symbol:* EPC-DO: 18-063  
*LA-UR:* 18-20919  
*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

**Subject: Request for Accumulation and Storage Extension at the Los Alamos National Laboratory, EPA ID #NM0890010515**

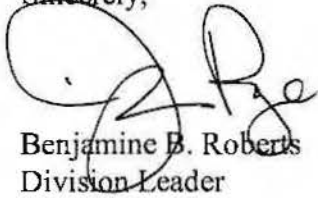
Dear Mr. Kieling:

The purpose of this letter is to request an extension of time for waste currently located in central accumulation areas and permitted units at the Los Alamos National Laboratory (LANL). As discussed with you and your staff on February 1, 2018, a recent labeling incident associated with a waste shipment to an off-site disposal facility has led to a LANL site-wide pause of hazardous and mixed low-level waste shipment activities. Due to this pause, the waste containers listed in Enclosure 1 are anticipated to or have exceeded the 90 day or 1 year storage time frame allowed for by 40 CFR § 262.34 or the LANL Hazardous Waste Facility Permit (the Permit). Per Permit Section 1.9.19, *Extensions of Time*, the U.S. Department of Energy (DOE) and the Los Alamos National Security, LLC (LANS), the Permittees, hereby request an extension of storage of waste in the permitted units and central accumulation areas listed in Enclosure 1.

Corrective actions underway to lift the waste shipment pause are anticipated to last through March 30, 2018. A deliberate and slow start approach is ongoing as operations personnel practice new procedures to ensure the appropriate quality assurance processes are in place prior to resuming shipping operations.

If you would like to further discuss this submittal, please contact Karen E. Armijo (DOE) at (505) 665-7314 or Mark Haagenstad (LANS) at (505) 665-2014.

Sincerely,

  
for  
B. Roberts  
Benjamin B. Roberts  
Division Leader

Sincerely,

  
Karen E. Armijo  
Permitting and Compliance Program Manager

BPR/KEA/MPH:am

Enclosure(s):

Enclosure 1 List of Waste Containers Stored or Anticipated to be Stored Over Ninety Days  
or One Year

Copy: Laurie King, USEPA/Region 6, Dallas, TX (E-File)  
Neelam Dhawan, NMED-HWB, Santa Fe, NM, (E-File)  
Siona Briley, NMED-HWB, Santa Fe, NM (E-File)  
William S. Goodrum, NA-LA, (E-File)  
Peter Maggiore, NA-LA, (E-File)  
Jody M. Pugh, NA-LA, (E-File)  
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# **ENCLOSURE 1**

**List of Waste Containers Stored or Anticipated to be Stored Over  
Ninety Days or One Year**

**EPC-DO: 18-063**

**LA-UR-18-20919**

**FEB 0 8 2018**

**Date:** \_\_\_\_\_

## List of Waste Containers Stored or Anticipated to be Stored Over Ninety Days or One Year

Location: Permitted Unit at TA-54, Area L

Container ID	Accum Start D.	EPA Hazardous Waste Numbers	Phys. State	Vol (m <sup>3</sup> ) Wt (Kg)	W. Type WS ID
W70508	03/01/17	D004 D005 D006 D007 D008 D009 D010 D011 D018 D019 D021 D022 D026 D027 D028 D029 D030 D035 D036 D037 D038 D039 D040 D043 F001 F002 F004 F005 F006 F007 F009	S	0.21 m <sup>3</sup>	MLLW
W70513	02/09/17	D004 D005 D006 D007 D008 D009 D010 D011 D018 D019 D021 D022 D026 D027 D028 D029 D030 D035 D036 D037 D038 D039 D040 D043 F001 F002 F004 F005 F006 F007 F009	S	0.21 m <sup>3</sup>	MLLW
W70553	02/09/17	D004 D005 D006 D007 D008 D009 D010 D011 D018 D019 D021 D022 D026 D027 D028 D029 D030 D035 D036 D037 D038 D039 D040 D043 F001 F002 F004 F005 F006 F007 F009	S	0.21 m <sup>3</sup>	MLLW
W71484	02/14/17	D004 D005 D006 D007 D008 D009 D010 D011 D018 D019 D021 D022 D026 D027 D028 D029 D030 D035 D036 D037 D038 D039 D040 D043 F001 F002 F004 F005 F006 F007 F009	S	0.32 m <sup>3</sup>	MLLW
W794668	01/11/17	D004 D005 D006 D007 D008 D009 D010 D011 D018 D019 D021 D022 D026 D027 D028 D029 D030 D035 D036 D037 D038 D039 D040 D043 F001 F002 F004 F005 F006 F007 F009	S	0.21 m <sup>3</sup>	MLLW
W834535	02/02/17	D008	S	50.97 m <sup>3</sup>	MLLW
W835847	01/31/17	D001 D002 D005 D006 D007 D011 F003	L	0.02 m <sup>3</sup>	HAZ
W836320	02/14/17	D022 F002	L	0.02 m <sup>3</sup>	HAZ
W69665	03/21/17	D006 D007 D008 D009 D010 D011	S	0.21 m <sup>3</sup>	MLLW
W70568	03/21/17	D004 D005 D006 D007 D008 D009 D010 D011 D018 D019 D021 D022 D026 D027 D028 D029 D030 D035 D036 D037 D038 D039 D040 D043 F001 F002 F004 F005 F006 F007 F009	S	0.32 m <sup>3</sup>	MLLW
W835439	03/08/17	D002	L	0.05 m <sup>3</sup>	MLLW
W838023	03/20/17	D001	L	0.21 m <sup>3</sup>	HAZ

**Location: Permitted Unit at TA-55, Outside Storage Pad**

Container ID	Accum. Start Date	EPA Hazardous Waste Numbers	Physical State	Vol (M3) Wt (Kg)	W. Type WS ID
W837649	03/7/17	D008	S	0.21 m <sup>3</sup>	MLLW
W838416	03/7/17	D007	S	0.04 m <sup>3</sup>	MLLW
W838417	03/7/17	D001 D007	S	0.04 m <sup>3</sup>	MLLW

**Location: Central Accumulation Area at TA-22**

Container ID	Accum. Start Date	EPA Hazardous Waste Numbers	Physical State	Vol (M3) Wt (Kg)	W. Type WS ID
W839298	9/29/17	D002	L	3.1 Kg	HAZ
W839299	9/29/17	D002	L	3.1 Kg	HAZ
W839330	11/14/17	D002 D007	L	300.7 Kg	HAZ
W839331	11/14/17	D002 D007	L	266.7 Kg	HAZ
W839570	11/14/17	D002 D007	L	229 Kg	HAZ
W839571	11/14/17	D002 D007	L	203.2 Kg	HAZ
W839572	11/14/17	D002 D007	L	204.5 Kg	HAZ
W839573	11/14/17	D002 D007	L	201.4 Kg	HAZ
W839589	11/14/17	D002 D007	L	206.8 Kg	HAZ
W839590	11/14/17	D002 D007	L	208.6 Kg	HAZ

**Location: Central Accumulation Area at TA-36-48**

Container ID	Accum. Start Date	EPA Hazardous Waste Numbers	Physical State	Vol (M3) Wt (Kg)	W. Type WS ID
W839101	11/07/17	D001 F003	L	201.8 Kg	HAZ
W842315	12/8/17	D001	L	61.5 Kg	HAZ
W842404	12/8/17	D002	L	4.2 Kg	HAZ
W842485	12/8/17	D001	L	52.6 Kg	HAZ

**Location: Central Accumulation Area at TA-3-66**

Container ID	Accum. Start Date	EPA Hazardous Waste Numbers	Physical State	Vol (M3) Wt (Kg)	W. Type WS ID
W820546	11/17/17	D003	S	0.11 m <sup>3</sup>	HAZ
W820547	11/17/17	D001	S	0.32 m <sup>3</sup>	HAZ
W820548	12/14/17	D001	S	0.32 m <sup>3</sup>	HAZ

**Location: Central Accumulation Area at TA-03-1819-103**

Container ID	Start Date	RCRA Codes	Physical State	Vol (M3) Wt (Kg)	W. Type WS ID
W842870	1/5/2018	D022, F002, F005	S	27.49 Kg	HAZ
W842871	1/5/2018	D001, D002, D011	L	7.44 Kg	HAZ
W842872	1/5/2018	D001, D002, D011	L	7.44 Kg	HAZ
W842873	1/5/2018	D004, D005, D006, D007, D008, D010, D011	L	27.49 Kg	HAZ
W842874	1/5/2018	D001, D002, F002	L	35.65 Kg	HAZ
W842876	1/5/2018	D001, F003, F005	L	8.16 Kg	HAZ
W843039	1/5/2018	D001, F003, F005	L	8.26 Kg	HAZ

**Location: Central Accumulation Area at TA-48**

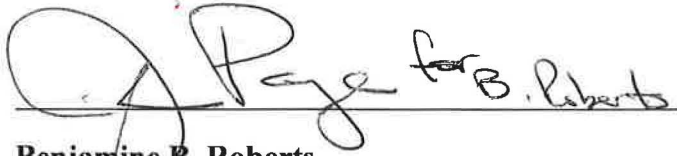
Container ID	Accum. Start Date	EPA Hazardous Waste Numbers	Physical State	Vol (M3) Wt (Kg)	W. Type WS ID
W842511	01/02/18	D008	S	185 Kg	MLLW
W842948	01/26/18	D001 D019 D028 D033 F002 F003 F005	L	20.9 Kg	MLLW

**Location: Central Accumulation Area at TA-35, 85E**

Container ID	Accum. Start Date	EPA Hazardous Waste Numbers	Physical State	Vol (M3) Wt (Kg)	W. Type WS ID
W842565	1/5/18	D001, D018, F003, F005	L	11.250 kg	HAZ
W842563	1/5/18	D001, F002, F003, F005	L	5.20 kg	HAZ
W842560	1/5/18	D001, D022, F001, F003	L	20.78 kg	HAZ
W842557	1/5/18	D001, D022, D038, F002, F003, F005	L	20.44 kg	HAZ
W842558	1/5/18	D001, D022, F002, F003, F005	L	5.47 kg	HAZ
W842562	1/5/18	D001, F002, F003	L	19.67 kg	HAZ
W842564	1/5/18	D001, F002, F003	L	5.56 kg	HAZ
W842561	1/10/18	D001, D022, F001, F003, F005	L	11.23 kg	HAZ

## 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.



**Benjamin B. Roberts**

Division Leader

Environmental Protection and Compliance Division

Los Alamos National Security, LLC

Los Alamos National Laboratory

Operator



**Date Signed**



**Karen E. Armijo**

Permitting and Compliance Program Manager

National Nuclear Security Administration

Los Alamos Field Office

U.S. Department of Energy

Owner/Operator



**Date Signed**