



Environmental Protection and Compliance

Los Alamos National Laboratory
PO Box 1663, K491
Los Alamos, NM 87545
(505) 667-2211

Date: MAY 2 8 2020

Symbol: EPC-DO: 20-163

LA-UR: 20-23783

Locates Action No.: N/A

Mr. Kevin Pierard, Chief Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505

Subject: Affidavits Concerning Hazardous Waste Management Activities in Calendar Year

2019 for Triad National Security LLC, Calculation of Annual Fees, Los Alamos

National Laboratory (LANL) EPA ID #NM0890010515

Dear Mr Pierard:

This letter transmits the enclosed affidavits for Los Alamos National Laboratory (LANL) permitted and interim status hazardous waste management units owned and operated by the U.S. Department of Energy, National Nuclear Security Administration (DOE-NNSA) and Triad National Security, LLC (Permittees) under the Hazardous Waste Facility Permit, EPA ID# NM0890010515. The specific permitted sites identified below were not used in calendar year 2019 (January 1, 2019 through December 31, 2019). Per Section 211 of the Hazardous Waste Permit and Corrective Action Fees ("Fee Regulations"), Title 20, Chapter 4, Part 2 of the New Mexico Administrative Code (20.4.2.211 NMAC) this notification provided to the Hazardous Waste Bureau of the New Mexico Environment Department (NMED-HWB) supports a waiver of the annual fee for units that were not used in calendar year 2019.

On March 11, 2020, Governor Michelle Lujan Grisham issued the Executive Order 2020-004 declaring a public health emergency due to COVID-19. On March 23, 2020, a Public Health Order ("Order") issued by the New Mexico Department of Health detailing the requirements for essential and nonessential businesses. Per this Order, essential businesses "...may remain open provided they minimize their operations and staff to the greatest extent possible." Order, page 4. LANL, which falls under the category of essential businesses in the Order, has required effective March 24, 2020 that all LANL employees telecommute aside from key staff who remain on site. Therefore, at this time, due to health and safety concerns surrounding COVID-19 and New Mexico's Executive Order and Public Health Order, the Permittees cannot fully execute the enclosed affidavits and submit



EPC-DO: 20-163 Mr. Kevin Pierard

original, signed, and notarized affidavits. However, to support the waiver under the Fee Regulations, Permittees have determined to submit the enclosed affidavits. These affidavits have been reviewed and when possible, electronically signed by the responsible individual(s) and verified to be true, accurate, and complete.

The following list of permitted and interim status units did not manage hazardous waste in calendar year 2019:

- Technical Area (TA) 14-23, Burn Cage
- TA-14-23, Open Detonation Unit
- TA-16-399, Burn Tray
- TA-36-08, Open Detonation Unit
- TA-39-6, Open Detonation Unit
- TA-39-57, Open Detonation Unit
- TA-50-69
- TA-54-38, West, Indoor Container Storage Unit
- TA-54-38, West, Outdoor Container Storage Unit
- TA-55, PF-4 Basement, Vault Container Storage Unit
- TA-55, Building PF-4 B05, Container Storage Unit
- TA-55, Building PF-4 B13, Container Storage Unit
- TA-55, Building PF-4 –G12, Container Storage Unit
- TA-03-0029-9030, Container Storage Unit

We respectfully appreciate your understanding of this matter, and will provide NMED-HWB the original, signed and notarized affidavits as soon as practicable.

Please contact Patrick L. Padilla at (505) 412-0462 or plpadilla@lanl.gov if additional information would be helpful.

Sincerely,

Jennifer E. Payne

Jennifer E. Payne
Division Leader
Environmental Protection and Compliance Division
Triad National Security, LLC
Los Alamos National Laboratory

JEP/PLP/CLJ:cs



Enclosure: 1) Affidavits Concerning Hazardous Waste Management Activities in Calendar Year 2019, EPA ID #NM0890010515

Copy: Karen E. Armijo, NA-LA, <u>Karen.Armijo@nnsa.doe.gov</u>
Michael W. Hazen, ALDESHQSS, <u>mhazen@lanl.gov</u>

Jennifer E. Payne, EPC-DO, jpayne@lanl.gov

Susan L. McMichael, GC-ESH, smcmichael@lanl.gov

Lauren E. Beers, GC-ESH, <u>lbeers@lanl.gov</u>

Peter Dickson, M-6, dickson@lanl.gov

Rebecca V. Hollis, NPI-6, rhollis@lanl.gov

Wendy Vogan McNeil, J-3, vogan@lanl.gov

Darren J. Hanson, J-8, dhanson@lanl.gov

Elizabeth A. Ronquillo, NPI-9, eamartinez@lanl.gov

Nestor A. Trujillo, NPI-7, nat@lanl.gov

Jackie C. Hurtle, EPC-WMP, jhurtle@lanl.gov

Patrick L. Padilla, EPC-WMP, plpadilla@lanl.gov

Catherine L. Juarez, EPC-WMP, cjuarez@lanl.gov

Oral S. Saulters, EPC-WMP, osaulters@lanl.gov

locatesteam@lanl.gov

epc-correspondence@lanl.gov

adesh-records@lanl.gov

rcra-prr@lanl.gov









Environmental Protection and Compliance Los Alamos National Laboratory PO Box 1663, K491 Los Alamos, NM 87545 (505) 667-2211

MAY 2 8 2020

Date:

Symbol: EPC-DO: 20-163

LA-UR: 20-23783

Locates Action No.: N/A

Mr. Kevin Pierard, Chief Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505

Subject: Affidavits Concerning Hazardous Waste Management Activities in Calendar Year 2019 for Triad National Security LLC, Calculation of Annual Fees, Los Alamos

National Laboratory (LANL) EPA ID #NM0890010515

Dear Mr. Pierard:

This letter transmits the enclosed affidavits for Los Alamos National Laboratory (LANL) permitted and interim status hazardous waste management units owned and operated by the U.S. Department of Energy, National Nuclear Security Administration (DOE-NNSA) and Triad National Security, LLC (Permittees) under the Hazardous Waste Facility Permit, EPA ID# NM0890010515. The specific permitted sites identified below were not used in calendar year 2019 (January 1, 2019 through December 31, 2019). Per Section 211 of the Hazardous Waste Permit and Corrective Action Fees ("Fee Regulations"), Title 20, Chapter 4, Part 2 of the New Mexico Administrative Code (20.4.2.211 NMAC) this notification provided to the Hazardous Waste Bureau of the New Mexico Environment Department (NMED-HWB) supports a waiver of the annual fee for units that were not used in calendar year 2019.

On March 11, 2020, Governor Michelle Lujan Grisham issued the Executive Order 2020-004 declaring a public health emergency due to COVID-19. On March 23, 2020, a Public Health Order ("Order") issued by the New Mexico Department of Health detailing the requirements for essential and nonessential businesses. Per this Order, essential businesses "...may remain open provided they minimize their operations and staff to the greatest extent possible." Order, page 4. LANL, which falls under the category of essential businesses in the Order, has required effective March 24, 2020 that all LANL employees telecommute aside from key staff who remain on site. Therefore, at this time, due to health and safety concerns surrounding COVID-19 and New Mexico's Executive Order and Public Health Order, the Permittees cannot fully execute the enclosed affidavits and submit



Enclosure 1

Affidavits Concerning Hazardous Waste Management Activities in Calendar Year 2019, EPA ID NM0890010515

EPC-DO-20-163

LA-UR-20-23783

Date: MAY 2 8 2020

- 1. I, Peter Dickson, am an employee of Triad National Security, LLC at the Los Alamos National Laboratory (LANL). I have been employed at LANL since 1997.
- 2. I am currently employed as the Group Leader for the M-6 Explosive Applications and Special Projects Group in the Associate Level Directorate for Weapons Engineering (ALDW). I have served in the position for approximately 10 years.
- 3. I am familiar with and directly responsible for waste management operations at the interim status units TA-14-23 Burn Cage, TA-14-23 Open Detonation Unit, the TA-39-6 Open Detonation Unit, and the TA-39-57 Open Detonation Unit. I am directly responsible for waste management operations at these units and the information provided to me by the employees who undertake waste management activities at these units.
- 4. I confirm that no waste management activities occurred during calendar year 2019 (January 1, 2019 December 31, 2019) at the TA-14-23 Burn Cage, TA-14-23 Open Detonation Unit, the TA-39-6 Open Detonation Unit, and the TA-39-57 Open Detonation Unit.

		Peter Dickson
STATE OF NEW MEXICO COUNTY OF LOS ALAMOS)) ss.	
SUBSCRIBED, SWORN TO AND 2 2020, by		OWLEDGED before me this day of
		NOTARY PUBLIC
My Commission Expires:		
My Commission Expires:		NOTARY PUBLIC

- 1. I, Darren Hanson, am an employee of Triad National Security, LLC at the Los Alamos National Laboratory (LANL). I have been employed at LANL since 2016.
- 2. I am currently employed as the Group Leader for the J-8 HE Fabrication and Disposition Group in the Associate Level Directorate for Weapons Engineering (ALDW). I have served in the position for approximately 4 years.
- 3. I am familiar with and directly responsible for waste management operations at the interim status unit TA-16-399 Burn Tray. I am directly responsible for waste management operations at this unit and the information provided to me by the employees who undertake waste management activities at this unit.
- 4. I confirm that no waste management activities occurred during calendar year 2019 (January 1, 2019 December 31, 2019) at the TA-16-399 Burn Tray.

DARREN HANSON (Affiliate) Digitally signed by DARREN HANSON (Affiliate) Date: 2020.04.21 12:39:29-06'00'

	Darren J. H	lanson
STATE OF NEW MEXICO)) ss.	
COUNTY OF LOS ALAMOS)	
SUBSCRIBED, SWORN TO		D before me this day of
	NOTARY	PUBLIC
My Commission Expires:		

- 1. I, Elizabeth A. Ronquillo, am an employee of Triad National Security, LLC at the Los Alamos National Laboratory (LANL). I have been employed at LANL since 1986.
- 2. I am currently employed as a Group Leader for the NPI-9 Nuclear Material Support Services Group in the Associate Level Directorate for Weapons Production (ALDWP). I have served in the position for approximately 4 years.
- 3. I am familiar with and directly responsible for waste management operations at the TA-55, PF-4 Basement, Vault. I am directly responsible for waste management operations at this unit and the information provided to me by the employees who undertake waste management activities at this unit.
- 4. I confirm that no waste management activities occurred during calendar year 2019 (January 1, 2019 December 31, 2019) at the TA-55, PF-4 Basement, Vault container storage unit.

	ELIZABETH Digitally signed RONQUILLO (Affiliate) Date: 2020.05.1	erit		
	Elizabeth A. Ronquillo	Elizabeth A. Ronquillo		
STATE OF NEW MEXICO)			
COUNTY OF LOS ALAMOS) ss.)			
SUBSCRIBED, SWORN TO A	ND ACKNOWLEDGED before me this	day of		
	NOTARY PUBLIC			
My Commission Expires:				

- 1. I, Nestor Trujillo, am an employee of Triad National Security, LLC at the Los Alamos National Laboratory (LANL). I have been employed at LANL since 2001.
- 2. I am currently employed as a Group Leader for the NPI-7 Nuclear Material Support Services Group in the Associate Level Directorate for Weapons Production (ALDWP). I have served in the position for approximately 1 month.
- 3. I am familiar with and directly responsible for waste management operations at the TA-55 container storage units: Building PF-4 B05, Building PF-4 G12, Building PF-4 B13 and the TA-50-69; and TA-54-38 West, Indoor and Outdoor container storage units. I am directly responsible for waste management operations at these units and the information provided to me by the employees who undertake waste management activities at these units.
- 4. I confirm that no waste management activities occurred during calendar year 2019 (January 1, 2019 December 31, 2019) at the TA-55 container storage units: Building PF-4 B05, Building PF-4 G12, Building PF-4 B13 and the TA-50-69; and TA-54-38 West, Indoor and Outdoor container storage units.

FURTHER AFFIANT SAYETH NAUGHT,		NESTOR TRUJILLO (Affiliate) Digitally signed by NESTOR TRUJILLO (Affiliate) Date: 2020.05.18 11:52:54 -06'00'		
	N	estor A. Tru	jillo	
STATE OF NEW MEXICO)) ss			
COUNTY OF LOS ALAMOS) ss.)			
SUBSCRIBED, SWORN TO AND A2020, by		VLEDGED (pefore i	me this day of
	N	OTARY PU	BLIC	
My Commission Expires:				

- 1. I, Rebecca V. Hollis, am an employee of Triad National Security, LLC at the Los Alamos National Laboratory (LANL). I have been employed at LANL for over 15 years total starting in since 1991.
- 2. I am currently employed as a Group Leader for the NPI-7 Nuclear Material Support Services Group in the Associate Level Directorate for Weapons Production (ALDWP). I have served in the position for approximately 3 months.
- 3. I am familiar with and directly responsible for waste management operations at the TA-03-0029-9030 container storage units. I am directly responsible for waste management operations at these units and the information provided to me by the employees who undertake waste management activities at these units.
- 4. I confirm that no waste management activities occurred during calendar year 2019 (January 1, 2019 December 31, 2019) at the TA-03-0029-9030 container storage units.

REBECCA HOLLIS

Rebecca V. Hollis

(Affiliate)

Digitally signed by REBECCA

Date: 2020.05.05 14:39:11 -06'00'

HOLLIS (Affiliate)

STATE OF NEW MEXICO)
COUNTY OF LOS ALAMOS) ss.)
SUBSCRIBED, SWORN TO 2020, by	AND ACKNOWLEDGED before me this day of
	NOTARY PUBLIC
My Commission Expires:	

- 1. I, Wendy Vogan McNeil, am an employee of Triad National Security, LLC at the Los Alamos National Laboratory (LANL). I have been employed at LANL since 2003.
- 2. I am currently employed as the Group Leader for the J-3 Focused Experiments Group in the Associate Level Directorate for Weapons Engineering (ALDW). I have served in the position for approximately 3 years.
- 3. I am familiar with and directly responsible for waste management operations at the interim status unit the TA-36-08 Open Detonation Unit. I am directly responsible for waste management operations at the unit and the information provided to me by the employees who undertake waste management activities at these units.
- 4. I confirm that no waste management activities occurred during calendar years 2019, 2018, 2017, 2016, 2015 (January 1, 2015 – December 31, 2019) at the TA-36-08 Open Detonation Unit.

FURTHER AFFIANT SAYETH NAUGHT.

Wendy Vogan Digitally signed Vogan McNeil Digitally signed by Wendy Date: 2020.05.04 08:05:14 McNeil -06'00' Wendy Vogan McNeil

STATE OF NEW MEXICO) ss.			
COUNTY OF LOS ALAMOS)			
SUBSCRIBED, SWORN TO AND ACKNOWLEDGED before me this day of 2020, by			
NOTARY PUBLIC			
My Commission Expires:			