



Michelle Lujan Grisham  
Governor

Howie C. Morales  
Lt. Governor

NEW MEXICO  
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau  
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James C. Kenney  
Cabinet Secretary

Jennifer J. Pruett  
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

ESHID-603618

December 18, 2020

Kirk Lachman, Manager  
Environmental Management  
Dept. of Energy, Los Alamos Field Office  
P.O. Box 1663, M984  
Los Alamos NM 87544

Michael Weis, Manager  
National Nuclear Security Administration  
Dept. of Energy, Los Alamos Field Office  
3747 West Jemez Road, A316  
Los Alamos NM 87544

RE: **REQUEST FOR INFORMATION  
LOS ALAMOS NATIONAL LABORATORIES  
EPA ID# NM0890010515**

Dear Mr. Lachman and Mr. Weis:

Pursuant to Permit Condition 1.9.7 and Section 74-4-4.3.A of the New Mexico Hazardous Waste Act (“HWA”), NMSA 1978, §§ 74-4-1 to -14, the New Mexico Environment Department (“NMED”) hereby requests that Los Alamos National Laboratories (“LANL”) provide NMED the below-listed information. NMED has reviewed the annual Waste Minimization Report, dated November 30, 2020, and requests additional information.

Section 74-4-4.3.A of the HWA provides that “[f]or the purposes of developing or assisting in the development of any rules, conducting any study, taking any corrective action or enforcing the provisions of the Hazardous Waste Act, upon request of the secretary or his authorized representative, any person who generates, stores, treats, transports, disposes of or otherwise handles or has handled hazardous wastes shall furnish information relating to such hazardous wastes. . . .”

The Waste Minimization Report describes activities for which NMED is requesting additional information. NMED is requesting information concerning the processes generating wastes; management of wastes including storage and/or treatment; and any disposal documentation associated with waste streams, from the processes listed below.

The specific processes include:

Triad Response - Section 2.3.1 lists the following activities.

- Planetary Ball Milling for waste reduction in HE processes
- Copper Bioleaching for target development in plasma physics research
- Resonant Acoustic Mixing (RAM) in explosive processing

- Ammonium Bifluoride (ABF) used to dissolve post detonation debris

N3B Section 3.4 lists the following activities.

- Solvent recovery system for acetonitrile in HPLC chromatography wastes
- Solvent evaporator system for hexane recovered from wastewater samples
- Planetary ball milling for acid waste reduction

Your compliance with this information request is mandatory. Failure to respond fully and truthfully within the time specified herein, or adequately justify such failure to respond, may result in an enforcement action by NMED pursuant to Section 74-4-10 of the HWA. The HWA provides for the imposition of civil penalties for non-compliance. Section 74-4-12 of the HWA provides that any person who violates any provision of the HWA "may be assessed a civil penalty not to exceed ten thousand dollars (\$10,000) for each day during any portion of which a violation occurs, *see also* Sections 74-4-10(A) and (B) of the HWA. The HWA also provides for criminal fines and imprisonment for knowingly omitting material information or making a false statement or representation in any document use for compliance with Section 74-4-11(A)(3) of the HWA.

LANL may claim confidentiality of any information required by this information request pursuant to the requirements of Sections 74-4-4.3(D) and (F) of the HWA, and 20.4.1.100 NMAC (incorporating 40 CFR 260.2). Such a claim must be made at the time of submittal. Any records, reports or information provided in response to this request shall be available to the public upon request if no claim of confidentiality is asserted by LANL.

Please submit your response to Don Meyer at the address on the letterhead by **January 30, 2021**. If you have any questions regarding the information request, please contact Don Meyer at 505-476-6021 or by email at [don.meyer@state.nm.us](mailto:don.meyer@state.nm.us).

Sincerely,

Kevin  
Pierard

Digitally signed by  
Kevin Pierard  
Date: 2020.12.18  
15:51:55 -07'00'

Kevin M. Pierard, Chief  
Hazardous Waste Bureau

KP:dm

cc: Don Meyer, NMED HWB  
Janine Kraemer, NMED HWB  
Robert Italiano, NMED District II Manager

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