



**Michelle Lujan Grisham**  
Governor

**Howie C. Morales**  
Lt. Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

**Hazardous Waste Bureau**  
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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**



**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

**ESHID-603632**

April 5, 2021

Karen Armijo, Program Manager  
National Nuclear Security Administration  
Los Alamos Field Office  
3747 West Jemez Road, A 316  
Los Alamos, NM 87544

Arturo Duran, Program Manager  
DOE Environmental Management  
Los Alamos Field Office  
P.O. Box 1663, MS-K491  
Los Alamos, NM 87545

**RE: SUPPLEMENTAL INFORMATION REQUEST  
FISCAL YEAR (FY) 2020 STATUS UPDATE FOR NON-CONFORMANCE REPORT (NCR) CONTAINERS  
LOS ALAMOS NATIONAL LABORATORY  
EPA ID#NM0890010515  
HWB-LANL-MISC**

Dear Ms. Armijo and Mr. Duran:

The New Mexico Environment Department (NMED) received Fiscal Year (FY) 2020 Status Update for Non-Conformance Report (NCR) Containers (NCR Report), dated and received on December 22, 2020 (referenced by EPC-DO-20-341/LA-UR-20-28036). The NCR Report was submitted by the United States Department of Energy (DOE), Newport Nuclear-BWXT (N3B), and Triad National Security, LLC. (Triad), collectively, the Permittees.

NMED has reviewed the NCR Report and has the following comments:

**Enclosure 1, NA-LA/Triad NCR Page 1 of 2:**

1. LA00000067822 "Oxidizing chemicals that are sole component of the waste".  
Please explain why D002 was not conservatively applied to this container or provide documentation supporting the fact that liquids are not present.
2. LA 00000068163 "an unknown amount of liquid waste."  
Please explain why D002 was not conservatively applied to this container or provide documentation supporting absence of liquids in the container.

**Page 2 of 2:**

3. LA00000069506 "assumes that the liquid is nitric acid"  
However, D002 HWN was not applied, Provide an explanation.
4. LA00000073938, LA 00000073953 "Compatibility Evaluation."  
Provide additional details on this evaluation and findings.

**Enclosure 2, EM-LA/N3B NCR, Page 1, 2, and 3 of 6:**

5. The summaries provided in the columns “Reason Container Failed for Bok”, and “Path Forward for Remediation of Container” do not provide enough detail to determine the issues which were resolved by CCP’s re-evaluation of the containers. Please provide more details.

**Pages 3, 4 and 5 of 6:**

6. Described as “absorbing free liquids.”  
Please clarify if liquids are D002.

**Page 6 of 6**

7. For containers 64778, and 64786 “BoK20 for LA-MHD03, 001 rejects containers,,”  
Please provide a summary of why this waste was rejected.
8. For containers 68154, 68155, 68161, and 68264 Described as “absorbing free liquids”  
Clarify if liquids are D002.

The Permittees must provide a response to these comments within 60-days of receipt of this letter. If you have any questions regarding this letter, please contact Siona Briley of my staff at (505) 690-5160.

Sincerely,

**Kevin  
Pierard**

Digitally signed by  
Kevin Pierard  
Date: 2021.04.05  
15:45:10 -06'00'

Kevin M. Pierard, Chief  
Hazardous Waste Bureau

cc:

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File: 2021 LANL Permit, Supplemental Information Request Non-conformance Report FY2020  
LANL-MISC

