



Environmental Protection & Compliance Division

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***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: November 4, 2021
Symbol: EPC-DO-21-347
LA-UR: LA-UR-21-30626
Locates Action No.:

Mr. Dave Cobrain, Program Manager
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

**Subject: Notice of Intent to Appeal 2021 Annual Fee, Los Alamos National Laboratory,
EPA ID # NM0890010515**

Dear Mr. Cobrain:

This letter and the attached provide notice to the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) of the Permittees' intent to appeal the 2021 Annual Fee, delivered to the Los Alamos National Laboratory Permittees on October 19, 2021. The Permittees consist of the United States Department of Energy (DOE) National Nuclear Security Administration Los Alamos Field Office (NA-LA); DOE-Environmental Management Los Alamos Field Office (EM-LA); Triad National Security, LLC (Triad); and Newport News Nuclear BWXT-Los Alamos, LLC (N3B).

NA-LA and Triad respectfully request an update to Table A – Hazardous Waste Management Activities to reflect the revisions provided in the attached because Table A does not accurately reflect which units are in use. The requested changes result in a net decrease of \$20,000 in the assessed fees and include:

- removal of fees for three container storage units;
- addition of fees for three container storage units;
- removal of fees for five treatment units; and
- addition of five treatment units for completeness.

The attached provides detail and explanation for the requested changes to the assessed fees for only those units under the responsibility of NA-LA and Triad.

In accordance with Title 20, Chapter 4, Part 2, Section 302 of the New Mexico Administrative Code, *Appeal of Fee Assessment*, NA-LA and Triad welcome the opportunity to confer with NMED-HWB to address any questions related to the proposed changes to the 2021 Annual Fee assessment.

Please contact Karen E. Armijo, NA-LA, at (505) 221-3664, or Patrick L. Padilla, Triad, at (505) 412-0462 if you wish to arrange a meeting to discuss the requested changes and updates.

Sincerely,

JENNIFER
PAYNE (Affiliate)

Digitally signed by JENNIFER
PAYNE (Affiliate)
Date: 2021.10.27 18:42:51
-06'00'

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

Sincerely,

Karen E.

Armijo

Karen E. Armijo

Permitting and Compliance Program Manager
National Nuclear Security Administration
Los Alamos Field Office
U.S. Department of Energy

Digitally signed by Karen
E. Armijo
Date: 2021.11.04
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JEP/KEA/PLP

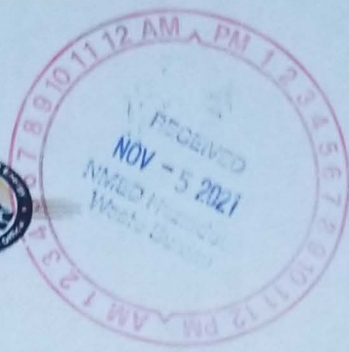
Attachment: Requested Changes to Table A – Hazardous Waste Management Activities

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Attachment

Requested Changes to Table A – Hazardous Waste
Management Activities

EPC-DO-21-347

LA-UR-21-30626

Date: November 4, 2021

Requested Changes to Table A – Hazardous Waste Management Activities

Requested Fee Changes

TA Unit Number	Description	Process	NMED Assessed Fee	Co-Operator	NA-LA and Triad Permittee Comment	Permittee Proposed Fee	Proposed Change to Fee
50-69-102/103	WCRFF Indoor (Rooms 102 & 103)	S01-Container Storage	\$3,000	NA-LA and Triad	Affidavit submitted - no container storage activities occurred during CY 2020	No Charge	-\$3,000
50-69-102/103	WCRFF Indoor (Rooms 102 & 103)	T04-Treatment	\$4,000	NA-LA and Triad	Affidavit submitted - no treatment activities occurred during CY 2020	No Charge	-\$4,000
54-38	TA-54 West, TA-54-38, RANT Building (Includes RANT High Bay & Low Bay)	S01-Container Storage	No Charge	NA-LA and Triad	No affidavit was submitted for CY2020, so fee should be assessed	\$3,000	+\$3,000
54-38	TA-54 West, TA-54-38, RANT Outdoor; North of Building & Loading Dock	S01-Container Storage	No Charge	NA-LA and Triad	No affidavit was submitted for CY2020, so fee should be assessed	\$3,000	+\$3,000
55-4	Area 03; Basement (B05)	S01-Container Storage	\$3,000	NA-LA and Triad	Affidavit submitted - no container storage activities occurred during CY 2020	No Charge	-\$3,000
55-4	Area 05; Basement (B13)	S01-Container Storage	No Charge	NA-LA and Triad	No affidavit was submitted for CY2020, so fee should be assessed	\$3,000	+\$3,000
55-4	Area 03; Basement (G12)	S01-Container Storage	\$3,000	NA-LA and Triad	Affidavit submitted - no container storage activities occurred during CY 2020	No Charge	-\$3,000
55-4	Room B40 treatment	Macroencapsulation	\$4,000	NA-LA and Triad	Affidavit submitted - no treatment activities occurred during CY 2020	No Charge	-\$4,000
55-4	Room B45 treatment	Macroencapsulation	\$4,000	NA-LA and Triad	Affidavit submitted - no treatment activities occurred during CY 2020	No Charge	-\$4,000
55-4	Cementation Unit for Mixed TRU; First Floor (Cementation Unit)	T04-Treatment	\$4,000	NA-LA and Triad	Affidavit submitted - no treatment activities occurred during CY 2020	No Charge	-\$4,000
55-355 Pad	Room B45	Macroencapsulation	\$4,000	NA-LA and Triad	Remove "Room B45" from description. Affidavit submitted - no treatment activities occurred during CY 2020	No Charge	-\$4,000

Total **-\$20,000**

Units Requested to be Added to Table A - Hazardous Waste Management Activities

TA Unit Number	Description	Process	NMED Assessed Fee	Co-Operator	NA-LA and Triad Permittee Comment	Permittee Proposed Fee	Proposed Change to Fee
3-29	Room 9010 or 9020 treatment	Macroencapsulaton	Not Applicable	NA-LA and Triad	Affidavit submitted - no treatment activities occurred during CY 2020	No Charge	None
50-69	WCRFF Outdoor	Macroencapsulaton	Not Applicable	NA-LA and Triad	Affidavit submitted - no treatment activities occurred during CY 2020	No Charge	None
54-38	TA-54 West Outdoor treatment	Macroencapsulaton	Not Applicable	NA-LA and Triad	Affidavit submitted - no treatment activities occurred during CY 2020	No Charge	None
55	Storage Pad treatment	Macroencapsulaton	Not Applicable	NA-LA and Triad	Affidavit submitted - no treatment activities occurred during CY 2020	No Charge	None
63		Macroencapsulaton	Not Applicable	NA-LA and Triad	Affidavit submitted - no treatment activities occurred during CY 2020	No Charge	None