ESHID-603713





Environmental Protection & Compliance Division
P.O. Box 1663, MS M969
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(505) 667-2211

National Nuclear Security Administration
Los Alamos Field Office

3747 West Jemez Road, MS A316 Los Alamos, New Mexico 87544

(505) 667-5105, Fax (505) 667-5948

Date: August 22, 2022 Symbol: EPC-DO-22-230

LA-UR-22-28511

Mr. Rick Shean, Chief Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505-6313

Subject: Request for Extension of Time, Notice of Violation with Proposed Penalties, Los

Alamos National Laboratory, EPA ID# NM0890010515

Dear Mr. Shean:

The United States Department of Energy (DOE) National Nuclear Security Administration Los Alamos Field Office (NA-LA), in association with Triad National Security, LLC (Triad), submit this extension request to the New Mexico Environment Department-Hazardous Waste Bureau (NMED-HWB) Notice of Violation with Proposed Penalties (NOV) regarding the August 2020 Compliance and Evaluation Inspection, dated July 26, 2022, and received on August 8, 2022. NA-LA, Triad, DOE Environmental Management Los Alamos Field Office (EM-LA), and Newport News Nuclear BWXT-Los Alamos (N3B), are collectively the Permittees; however, NA-LA/Triad and EM-LA/N3B will be submitting separate responses to NMED-HWB.

The NOV requires a "written description of the actions taken by LANL [Los Alamos National Laboratory], to address violations described above or a schedule for implementation of corrective actions not yet completed" within 30 days. EM-LA, in association with N3B, will submit a response to NOV items 1 and 2. NA-LA, in association with Triad, requests an extension of time to respond to NOV items 3 through 6.

Per the Facility Hazardous Waste Permit Section 1.9.19, Extensions of Time, NA-LA and Triad request a 60-day extension to the submittal date. The response requires coordination and extensive research into records from 2020. The extension will enable NA-LA and Triad to conduct the necessary



coordination, evaluate the violations, and coordinate a comprehensive response to NMED-HWB. If approved, the new deadline for the response will be November 6, 2022.

If you have any questions for Triad or NA-LA, please contact Patrick Padilla (Triad) at 505-412-0462, plpadilla@lanl.gov or Karen Armijo (NA-LA) at 505-665-7314, karen.armijo@nnsa.doe.gov.

Sincerely,

JENNIFER Digitally signed by JENNIFER PAYNE (Affiliate) PAYNE (Affiliate) PAYNE (Affiliate) Page 2022.08.17 15:11:58

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

JEP/KEA/PLP

Sincerely,

KAREN
ARMIJO
Digitally signed by KAREN ARMIJO
Date: 2022.08.22
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Karen E. Armijo
Permitting and Compliance Program Manager
National Nuclear Security Administration
Los Alamos Field Office
U.S. Department of Energy

Copy:

Laurie King, USEPA/Region 6, Dallas, TX, king.laurie@epa.gov Rick Shean, NMED-HWB, Santa Fe, NM, rick.shean@state.nm.us Don Meyer, NMED-HWB, Santa Fe, NM, don.meyer@state.nm.us Neelam Dhawan, NMED-HWB, Santa Fe, NM, neelam.dhawan@state.nm.us Siona Briley, NMED-HWB, Santa Fe, NM, siona.briley@state.nm.us Mitchell Schatz, NMED-HWB, Santa Fe, NM, mitchell.schatz@state.nm.us Theodore A. Wyka, NA-LA, theodore.wyka@nnsa.doe.gov Stephen Hoffman, NA-LA, stephen.hoffman@nnsa.doe.gov P. Erika Baeza-Wisdom, NA-LA, erika.wisdom@nnsa.doe.gov Jason Saenz, NA-LA, jason.saenz@nnsa.doe.gov Karen E. Armijo, NA-LA, karen.armijo@nnsa.doe.gov Adrienne L. Nash, NA-LA, adrienne.nash@nnsa.doe.gov William R. Mairson, Triad, ALDESHQSS, wrmairson@lanl.gov Jeannette T. Hyatt, Triad, EWP, jhyatt@lanl.gov Sylvia de la Sancha, EWP, sdelasancha@lanl.gov Jennifer E. Payne, Triad, EPC-DO, jpayne@lanl.gov Kristen A. Honig, Triad, EPC-DO, khonig@lanl.gov Andie McLaughlin-Kysar, Triad, EPC-DO, andiek@lanl.gov Jessica L. Moseley, Triad, EPC-WMP, jmoseley@lanl.gov Patrick L. Padilla, Triad, EPC-WMP, plpadilla@lanl.gov Cecilia Trujillo, Triad, EPC-WMP, ceciliat@lanl.gov Geri Martinez, Triad, EPC-WMP, geri@lanl.gov M. Lee Bishop, EM-LA, lee.bishop@em.doe.gov Christian Maupin, N3B, christian.maupin@em-la.doe.gov rcra-prr@lanl.gov eshqss-dcrm@lanl.gov locatesteam@lanl.gov



Mr. Rick Shean EPC-DO-22-230

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