



ESHID-602850

Environmental Protection & Compliance Division
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National Nuclear Security Administration
Los Alamos Field Office
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JAN 23 2018

Date:
Symbol: EPC-DO: 18-024
LA-UR: 18-20302
Locates Action No.: **N/A**

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

Subject: Request for Extension of Time to NMED Request for Information, Los Alamos National Laboratory

Dear Mr. Kieling:

On December 19, 2017, the New Mexico Environment Department (NMED) issued a Request for Information (RFI), pursuant to NMSA 1978, Section 74-4-4.3(A) (2001) of the New Mexico Hazardous Waste Act. NMED is requesting the information in order to conduct "a thorough review of manifest discrepancies in waste characterization, which may have resulted in pauses in waste shipments". The request is based on two incidents involving waste shipments to Veolia ES Technical Solutions, LLC in Colorado for shipments received by that facility on October 5, 2016 and May 18, 2017.

The U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (collectively the Permittees) received this RFI on January 4, 2018 with a required response date of February 1, 2018.

NMED is requesting that the Permittees furnish the following information:

1. All documents, including correspondence, related to manifest discrepancies and/or waste characterization discrepancies for LANL for the last three years for all hazardous waste and mixed waste shipments.
2. All documents, including correspondence, related to any pauses in the shipping of any hazardous or mixed waste off-site for the last three years.

3. All documents (e.g. policies, standard operating procedures, memos) related to any DOE or LANS procedural changes due to mischaracterization of waste, manifest discrepancies or pauses in shipments of hazardous waste and mixed waste that have been created within the last three years.

For the reasons set forth below, the Permittees respectfully request a 60-day extension of time until March 30, 2018 in which to provide this response:

1. The Permittees did not receive the RFI until January 4th, 16 days after it was issued by NMED on December 19th. The Permittees were not able to disseminate the request immediately to personnel and organizations which are subject to the request.
2. The sheer volume of documentation requested covering a three-year time period will require additional time for the Permittees to gather, review and organize the applicable documents requested.

If you have comments/questions or would like to meet regarding this submittal, please contact Mark P. Haagenstad at (505) 665-2014 or Karen Armijo at (505) 665-7314.

Sincerely,



Benjamine B. Roberts
Division Leader

Sincerely,



Karen E. Armijo
Permitting and Compliance Program Manager

JCB/KEA/MPH/JMT:am

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