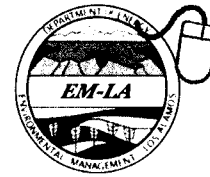


FFCO



N3B-Los Alamos
600 6th Street
Los Alamos, New Mexico 87544
(505) 661-5918



ENTERED

Environmental Management
Los Alamos Field Office
P.O. Box 1663, MS M984
Los Alamos, New Mexico 87545
(505) 665-5658/FAX (505) 606-2132

MAY 09 2019

Date: MAY 09 2019
Refer To: N3B-19-0141

Siona Briley, STP Project Manager
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6313

Subject: Second Request for Extension for Submittal of Site Treatment Plan, Fiscal Year 2018, Update and Proposed Revision 29.0, Federal Facility Compliance Order

Dear Ms. Briley:

This letter is to request an extension for submittal of the Los Alamos National Laboratory Federal Facility Compliance Order Annual Site Treatment Plan (STP) Update for Fiscal Year (FY) 2018 (hereafter, the FY 2018 Annual STP Update). The U.S. Department of Energy (DOE) is required to submit an annual STP update to the New Mexico Environment Department (NMED) on or before March 31 of each year. The DOE Environmental Management Los Alamos Field Office (EM-LA) and the National Nuclear Security Administration Los Alamos Field Office (NA-LA) are working with their respective contractors (Newport News Nuclear BWXT-Los Alamos, LLC [N3B] and Triad National Security, LLC [Triad]; collectively known as the Respondents) to develop the FY 2018 Annual STP Update.

Delays associated with the unapproved FY 2017 Annual STP Update are significantly impacting the preparation of the FY 2018 Annual STP Update. On December 6, 2018, NMED sent a letter titled "Disapproval, Resubmittal of Site Treatment Plan, Fiscal Year 2017 Annual Update and Proposed Revision 28.0, Federal Facility Compliance Order, October 4, 1995." NA-LA/Triad resubmitted the FY 2017 Annual STP Update on January 11, 2019; however, the January version has not been approved. An additional resubmittal of the FY 2017 Annual STP Update is due to NMED on May 9, 2019, with NMED approval anticipated about two months afterwards (around July 9, 2019).

Additional time for the FY 2018 Annual STP Update is required for the Respondents to verify and validate the FY 2018 data per the finalized and approved data from the FY 2017 Annual STP Update. Additionally, FY 2018 data are calculated based on the results from the final FY 2017 data, and new FY 2018 data requirements have been requested by NMED. Normally, the annual STP update work would begin in December and be submitted at the end of March, a total of four months. Also, the resources originally allocated for the FY 2019 Annual STP Update (January–May 2019)

38909



May 2019) are no longer readily available. The Respondents' intent is to deliver a high quality submittal, and the full four months is necessary.

For the reasons above, the Respondents respectfully request a four-month extension to submit the FY 2018 Annual STP Update, effective upon NMED's final approval notification of the FY 2017 Annual STP Update (submittal anticipated around November 9, 2019).

If you have any questions, please contact Stacie Singleton at (505) 695-4257 (stacie.singleton@em-la.doe.gov) or Elizabeth Churchill at (505) 819-9500 (elizabeth.churchill@em.doe.gov).

Sincerely,



Stacie Singleton
STP Project Manager
Regulatory and Stakeholder Interface
N3B-Los Alamos

Sincerely,



Elizabeth Churchill
STP Project Manager
Environmental Management
Los Alamos Field Office

Cy: (date-stamped letter emailed)
Laurie King, EPA Region 6, Dallas, TX
Neelam Dhawan, NMED-HWB
John Kieling, NMED-HWB
Karen Armijo, NA-LA
William Goodrum, NA-LA
Pete Maggiore, NA-LA
Adrienne Nash, NA-LA
Jody Pugh, NA-LA
Darlene Rodriguez, NA-LA
Lee Bishop, EM-LA
Elizabeth Churchill, EM-LA
Arturo Duran, EM-LA
Jesse Kahler, EM-LA
David Nickless, EM-LA
David Rhodes, EM-LA
Cheryl Rodriguez, EM-LA
Peter Carson, LANL
Michael Hazen, LANL
William Mairson, LANL
Ellena Martinez, LANL
Avril Millensted, LANL
Patrick L. Padilla, LANL
Enrique Torres, LANL
Carol Anderson, N3B
Lacey Bruaw, N3B
Emily Day, N3B

Ellen Gammon, N3B
Frazer Lockhart, N3B
Pamela Maestas, N3B
Danny Nichols, N3B
Ben Roberts, N3B
Stacie Singleton, N3B
epc-correspondence@lanl.gov
locatesteam@lanl.gov
rcra-prr@lanl.gov
emla.docs@em.doe.gov
N3B Records