

General

ENTRIBO



**Environment Safety & Health**  
**PO Box 1663, MS K491**  
Los Alamos, New Mexico 87545  
(505) 667-4218/Fax (505) 665-3811

**National Nuclear Security Administration**  
**Los Alamos Field Office, A316**  
3747 West Jemez Road  
Los Alamos, New Mexico, 87545  
(505) 667-5105/Fax (505) 667-5948

Date: **NOV 10 2015**  
Symbol: ADESH-15-162  
LA-UR: Not Applicable  
Locates Action No.: Not Applicable

Mr. Ryan Flynn  
Cabinet Secretary  
New Mexico Environment Department  
Harold L. Runnels Building  
1190 St. Frances Drive, Suite N4050  
Santa Fe, New Mexico 87505

**RECEIVED**

NOV 10

**NMED**  
**Hazardous Waste Bureau**

Dear Secretary Flynn:

**Subject: Characterization Conclusions, Extent of Condition Review Reporting, Los Alamos National Laboratory**

In a letter (DIR-15-127) to the New Mexico Environment Department (NMED) dated August 31, 2015, the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), the Permittees, reported noncompliance self-disclosures that were discovered during a Permittee-conducted Extent of Condition Review. The self-disclosure report included a description of a subset of the LA-CIN01 waste stream that included liquids. The Permittees conservatively labeled the liquid-containing drums with Environmental Protection Agency Hazardous Waste Numbers (EPA HWN) D001 (ignitability) and D002 (corrosivity). Section 4.D. of the self-disclosure report included a description of this portion of the waste stream and outlined the sampling and testing that the Permittees intended to conduct to confirm this characterization.

The Permittees have completed a set of testing that has confirmed the applicability of EPA HWN D001 and D002 characteristics for the subset of the LA-CIN01 waste stream that contain liquids. These results will be described and transmitted in a separate submittal. Based upon these test results, the Permittees will continue to manage this waste as described in the August 31, 2015 self-disclosure report with the EPA HWN D001 and D002 as appropriate.

The Permittees will schedule a meeting with members of your staff to describe in more detail the analytical tests and the results that supported this conclusion. If you have questions, please contact Mark Haagenstad (LANS) at (505) 665-2014 or Dave Nickless (DOE) at (505) 665-6448.



Sincerely,



Michael T. Brandt, DrPH, CIH  
Associate Director  
Environment, Safety & Health

Sincerely,



Kimberly Davis Lebak  
Manager  
Los Alamos Field Office  
U.S. Department of Energy

MTB:KBL/

Enclosures: (1) Certification Statement

Cy: Jeff Kendall, NMED-OGC, (E-File)  
Kathryn Roberts, NMED-EHD, (E-File)  
John Kieling, NMED-HWB, (E-File)  
Dave Cobrain, NMED-HWB, (E-File)  
Neelam Dhawan, NMED-HWB, (E-File)  
Siona Briley, NMED-HWB, (E-File)  
Douglas E. Hintze, EM-LA, (E-File)  
David Nickless, EM-WM, (E-File)  
Peter Maggiore, LASO-OOM, (E-File)  
Kimberly Davis Lebak, LASO-OOM, (E-File)  
Gene E. Turner, LASO-NS-LP, (E-File)  
Silas DeRoma, LASO-OC, (E-File)  
Jordan Arnswald, LASO-NS-PI, (E-File)  
Kirsten M. Laskey, EM-LA, (E-File)  
Craig S. Leasure, PADOPS, (E-File)  
Amy E. De Palma, PADOPS, (E-File)  
Randall M. Erickson, ADEP, (E-File)  
David J. Funk, ADEP, (E-File)  
Cheryl D. Cabbil, ADNHHO, (E-File)  
Michael T. Brandt, ADESH, (E-File)  
Raeanna R. Sharp-Geiger, ADESH, (E-File)  
Alison M. Dorries, ENV-DO, (E-File)  
Leslie K. Sonnenberg, EWMO-DO, (E-File)  
Paul N. Newberry, WD-SRS, (E-File)  
David E. Frederici, WD-WPE, (E-File)  
Deborah K. Woitte, LC-ESH, (E-File)  
Kenneth M. Hargis, WD-WPE, (E-File)  
Mark P. Haagenstad, ENV-CP, (E-File)  
Deborah L. Guffee, SI-DC, (E-File)  
Yvette S. Branch, SI-DC, (E-File)  
Luciana Vigil-Holterman, ENV-CP, (E-File)

Mr. Ryan Flynn  
ADESH-15-162

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Cy (continued):

lasomailbox@nnsa.doe.gov, (E-File)

locatesteam@lanl.gov, U1501310, (E-File)

env-correspondence@lanl.gov, (E-File)

epccat@lanl.gov, (E-File)

rcra-prr@lanl.gov, (E-File)

# **ENCLOSURE 1**

Certification Statement

ADESH-15-162

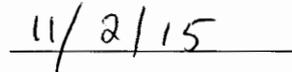
Date: NOV 10 2015

### CERTIFICATION

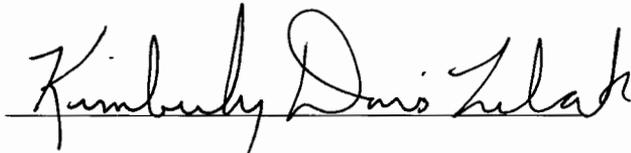
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



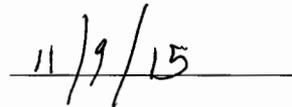
**Alison M. Dorries**  
Division Leader  
Environmental Protection Division  
Los Alamos National Laboratory  
Operator



Date Signed



**Kimberly Davis Lebak**  
Manager, Los Alamos Field Office  
National Nuclear Security Administration  
U.S. Department of Energy  
Owner/Operator



Date Signed