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**Date: OCT 31 2018**

**Symbol: EPC-DO-18-393**

**LA-UR: 18-29966**

**Locates Action No.: U1801172**

Ms. Michelle Hunter, Chief  
Ground Water Quality Bureau  
New Mexico Environment Department  
Harold Runnels Building, Room N2261  
1190 St. Francis Drive  
P.O. Box 26110  
Santa Fe, NM 87502

GROUND WATER

OCT 31 2018

BUREAU

**Subject: DP-1132, Condition No. 53, Request for an Extension of Time to Complete SET Pipeline Water Tightness Testing**

Dear Ms. Hunter:

On August 29, 2018, the New Mexico Environment Department (NMED) issued Discharge Permit DP-1132 to the U.S. Department of Energy and Los Alamos National Security, LLC (DOE/LANS) for discharges of treated effluent from the TA-50 Radioactive Liquid Waste Treatment Facility (RLWTF). Pursuant to permit Condition No. 53, *Extensions of Time*, DOE/LANS may seek an extension of time in which to perform an obligation in Discharge Permit DP-1132, for good cause, by sending a written request to NMED that states the length of the requested extension and describes the basis for the extension. DOE/LANS request an extension of time to complete water tightness testing, required by permit Condition No. 8, of the pipeline connecting the TA-50 RLWTF and the TA-52 Solar Evaporation Tank (SET).

Permit Condition No. 8 requires that DOE/LANS demonstrate that the pipeline conveying treated wastewater from the TA-50 RLWTF to the TA-52 SET—a pipeline without secondary containment—is not leaking. Further, Condition No. 8 stipulates that the tightness test shall be completed by February



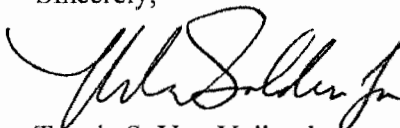
Permit Condition No. 8 requires that DOE/LANS demonstrate that the pipeline conveying treated wastewater from the TA-50 RLWTF to the TA-52 SET—a pipeline without secondary containment—is not leaking. Further, Condition No. 8 stipulates that the tightness test shall be completed by February 25, 2019, 180 days after permit issuance. DOE/LANS would like to delay conducting water tightness testing for the following reasons:

1. The RLWTF-SET pipeline was successfully tested for water tightness during construction of the SET in 2012.
2. The SET has yet to be placed into service since constructed.
3. The SET will not be placed into service until the following upgrades are completed:
  - ✓ Pursuant to permit Condition No. 30, a Moisture Monitoring System for the SET must be installed and approved for use by NMED.
  - ✓ The existing leak detection alarm system, situated between the SET's primary and secondary liners, will be rebuilt. The existing leak detection tape will be removed and a sump installed to capture liquid present between the primary and secondary liners. The sump will be alarmed and accessible for sampling and pumping.
  - ✓ The existing primary liner will be replaced with a new liner of equal or better quality.

DOE/LANS estimate the time required to complete the upgrades listed above at approximately 15 months. DOE/LANS request an extension of time to complete the required water tightness testing of the RLWTF-SET pipeline until all listed upgrades are completed.

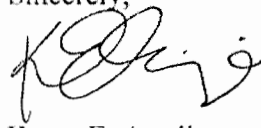
Please contact Karen E. Armijo by telephone at (505) 665-7314 or by email at [Karen.Armijo@nnsa.doe.gov](mailto:Karen.Armijo@nnsa.doe.gov), or Robert S. Beers by telephone at (505) 667-7969 or by email at [bbeers@lanl.gov](mailto:bbeers@lanl.gov) if you have questions regarding this request.

Sincerely,



Taunia S. Van Valkenburg  
Group Leader

Sincerely,



Karen E. Armijo  
Permitting and Compliance Program Manager

TVV/KEA/MTS/RSB:jdm

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