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*Symbol: EPC-DO-19-010
LA-UR: 19-20278
Locates Action No.: U1801172
Date: **JAN 22 2019***

GROUND WATER

JAN 23 2019

BUREAU

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

Subject: DP-1132, Condition No. 53, Request for an Extension of Time to Complete Outfall 051 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 for discharges of treated effluent from the TA-50 Radioactive Liquid Waste Treatment Facility (RLWTF). Subsequently, on November 1, 2018, DP-1132 was transferred to Triad National Security, LLC (DOE/Triad). Under Discharge Permit DP-1132, Condition No. 53, *Extensions of Time*, DOE/Triad may request from NMED an extension of time in which to perform a permit obligation. DOE/Triad must send a written request to NMED that states the length of the requested extension and describes the basis for the extension. Pursuant to permit Condition No. 53, DOE/Triad request an extension of time to complete water tightness testing of the pipeline connecting the TA-50 RLWTF and Outfall 051 in Mortandad Canyon.



Permit Condition No. 8 requires that DOE/Triad demonstrate that the pipeline conveying treated wastewater from the TA-50 RLWTF to Outfall 051—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/Triad request an extension of time for conducting water tightness testing for the following two reasons:

1. Between December 15, 2018, and January 15, 2019, Los Alamos National Laboratory received in excess of 36 inches of snow. The terminus of the outfall pipeline is down a north facing, very steep, dirt road. Access to the outfall prior to spring snow melt could presents significant safety concerns for LANL workers.
2. NPDES Outfall 051 is located within the Mexican Spotted Owl core habitat in Mortandad Canyon. The Mexican Spotted Owl is listed as a threatened species by the U.S. Fish and Wildlife Service. During the Mexican Spotted Owl's breeding season, noise disturbance is not permitted in its core habitat. Conducting work with heavy equipment or other noise-generating machinery is prohibited between March 1 and May 15.

Due to the factors listed above, DOE/Triad estimate that an additional four months will be required to complete water tightness testing of the pipeline to Outfall 051. Accordingly, DOE/Triad request an extension of time until June 25, 2019.

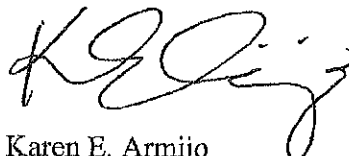
Please contact Karen E. Armijo by telephone at (505) 665-7314 or by email at Karen.Armijo@nnsa.doe.gov, or Robert S. Beers by telephone at (505) 667-7969 or by email at bbeers@lanl.gov if you have questions regarding this request.

Very truly yours,



Enrique "Kiki" Torres
Division Leader
Environmental Protection & Compliance
Triad National Security, LLC

Very truly yours,



Karen E. Armijo
Permitting and Compliance Program Manager
National Nuclear Security Administration
U.S. Department of Energy

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