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*Symbol: EPC-DO: 19-161  
LA-UR: 19-24391  
Locates Action No.: U1801172  
Date: **JUN 12 2019***

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**  
**JUN 12 2019**  
**BUREAU**

**Subject: DP-1132, Condition No. 8, Completion of Water Tightness Test, Outfall 051 Pipeline**

*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 Triad National Security, LLC (DOE/Triad) for discharges of treated effluent from the TA-50 Radioactive Liquid Waste Treatment Facility (RLWTF). Pursuant to permit Condition No. 8, *Water Tightness Testing*, DOE/Triad was required to 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.

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. On January 23, 2019, DOE/Triad submitted a written request (Attachment 1) to NMED for an extension of time until June 25, 2019, to complete water tightness testing of the pipeline connecting the TA-50 RLWTF and Outfall 051. On April 3, 2019, NMED approved the extension of time request (Attachment 2).

On May 24, 2019, DOE/Triad successfully completed the water tightness test of the pipeline from the RLWTF to Outfall 051. As required by Condition No. 8, test procedures and findings shall be submitted to NMED in the DP-1132 Annual Update Report (Due date: February 1, 2020).





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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 notification.

Sincerely,



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

Sincerely,



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

ET/KEA/MTS/RSB:jdm

Attachment(s): Attachment 1 DP-1132, Condition No. 53, Request for an Extension of Time to Complete Outfall 051 Pipeline Water Tightness Testing  
Attachment 2 Approval of DP-1132, Condition No. 53, Request for an Extension of Time

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# **ATTACHMENT 1**

**DP-1132, Condition No. 53, Request for an Extension of  
Time to Complete Outfall 051 Pipeline  
Water Tightness Testing**

**EPC-DO: 19-161**

**LA-UR-19-24391**

**Date: JUN 12 2019**



# COPY



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**National Nuclear Security Administration**  
**Los Alamos Field Office**  
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 (505) 665-7314/Fax (505) 667-5948

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](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.

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

TVV/KEA/MTS/RSB:jdm



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Robert S. Beers, EPC-CP, [bbeers@lanl.gov](mailto:bbeers@lanl.gov), (E-File)  
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## **ATTACHMENT 2**

Approval of DP-1132, Condition No. 53,  
Request for an Extension of Time

EPC-DO: 19-161

LA-UR-19-24391

Date:     **JUN 12 2019**



**From:** [Romero, Andrew C. NMENV](#)  
**To:** [Beers, Bob](#)  
**Subject:** Approval of DP-1132, Condition No. 53 Request for an Extension of Time  
**Date:** Wednesday, April 3, 2019 4:52:40 PM

Bob,

On January 23, 2019, the New Mexico Environment Department (NMED) Ground Water Quality Bureau (GWQB) received *DP-1132, Condition No. 53, Request for an Extension of Time to Complete Outfall 051 Pipeline Water Tightness Testing*. Condition No. 8 of DP-1132 requires 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 requests an extension of time for conducting water tightness testing for the following two reasons:

- 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 present significant safety concerns for LANL workers
- 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.

NMED hereby approves a longer period, for good cause, for Condition No. 8 as described in the Request for an Extension of Time to Complete Outfall 051 Pipeline Water Tightness Testing.

Approval of the *DP-1132, Condition No. 53, Request for an Extension of Time to Complete Outfall 051 Pipeline Water Tightness Testing* does not relieve the Permittee of the responsibility to comply with any other applicable federal, state, and/or local laws and regulations. This approval does not relieve the Permittee of liability should operations associated with this time extension result in actual pollution of ground or surface waters.

Thank you for your cooperation.

**Andrew C. Romero**  
Environmental Scientist, Pollution Prevention Section  
Ground Water Quality Bureau  
New Mexico Environment Department  
(505) 827-0076