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EMID-700343

Environmental Management
Los Alamos Field Office
P.O. Box 1663, MS M984
Los Alamos, New Mexico 87545
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Date: MAR 18 2019
Refer To: N3B-19-0079

James S. Sales
PCB Coordinator (6PD)
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Subject: Request for Extension for Storage of Bulk Polychlorinated Biphenyl/Radioactive Remediation Waste Generated at Los Alamos National Laboratory and Exemption from Two Monthly Storage Area Inspections

Dear Mr. Sales:

The purpose of this letter is to request an extension from the U.S. Environmental Protection Agency (EPA) of the 180-day timeframe for storage of bulk polychlorinated biphenyl (PCB)/radioactive remediation waste generated at Los Alamos National Laboratory (LANL) and to request an exemption from two monthly PCB storage area inspections as required by 40 Code of Federal Regulations Part 761.

The U.S. Department of Energy (DOE) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B) have been unable to access the PCB waste because of the unusually heavy snowfall earlier this year and the start of the annual Mexican spotted owl breeding season, as documented in the "Threatened and Endangered Species Habitat Management Plan for Los Alamos National Laboratory." Site access restrictions began March 1 and will continue until surveys are completed in late April. If nesting pairs are discovered within this area, site access restrictions will continue through August 31. Nesting pairs have historically occupied an area well outside of the PCB waste area; therefore, we anticipate the survey restrictions may be lifted as early as late April.

The PCB waste was generated in September 2018 during a Toxic Substances Control Act self-implementation and cleanup of PCB remediation waste at Technical Area 02 in Middle Los Alamos Canyon (Solid Waste Management Unit 02-014) at LANL in Los Alamos, NM. There are 56 U.S. Department of Transportation- (DOT-) approved industrial packages (IP1 containers of 5.14 cubic yards each) of PCB-contaminated/radioactive waste. The containers have double nylon walls with a 6-mil plastic liner for required secondary containment. The containers are closed per DOT regulations and are banded to pallets specifically manufactured for the containers. The containers are also covered with tarps banded to the containers and the pallets. The packaged and tarped waste is located on an elevated, level asphalt parking lot; the area is fenced and gated, as well

as patrolled regularly. The waste is properly labeled with all required markings. The containers are approved for disposal at Energy Solutions' permitted treatment, storage, and disposal facility in Clive, Utah, and will be shipped as soon as DOE/N3B regain access to them.

The 180-day expiration date is March 23, 2019, for the oldest container. DOE/N3B respectfully ask for an extension until March 1, 2020, to accommodate the unusual precipitation and endangered species restriction. DOE/N3B also ask to be exempted from performing the monthly PCB storage area inspections for March and April 2019.

If you have questions, please contact Brett Cummins at (505) 695-4354 (brett.cummins@em-la.doe.gov) or Arturo Duran at (505) 665-5330 (arturo.duran@em.doe.gov).

Sincerely,

Frazer Lockhart
Program Manager
Regulatory and Stakeholder Interface
N3B-Los Alamos

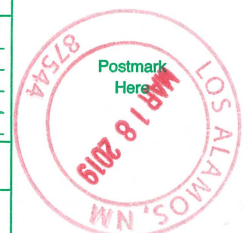
Sincerely,

Arturo Q. Duran, Compliance and Permitting Manager
Office of Quality and Regulatory Compliance
Environmental Management
Los Alamos Field Office

- Cy: (date-stamped letter emailed)
- Laurie King, EPA Region 6, Dallas, TX
 - Lee Bishop, EM-LA
 - Arturo Duran, EM-LA
 - Douglas Hintze, EM-LA
 - David Rhodes, EM-LA
 - Cheryl Rodriguez, EM-LA
 - Ben Underwood, EM-LA
 - Brenda Bowlby, N3B
 - Lacey Bruaw, N3B
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