



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733

APR 10 2019

Frazer Lockhart  
Program Manager  
Regulatory and Stakeholder Interface  
N3B – Los Alamos  
600 6th Street  
Los Alamos, New Mexico 87544

Arturo Q. Duran, Compliance and Permitting Manager  
Office of Quality and Regulatory Compliance  
Environmental Management  
Los Alamos Field Office  
P.O. Box 1663, MS M984  
Los Alamos, New Mexico 87545

**RE: Request for extension to the 180-day storage requirement and exemption from two inspection requirements of Polychlorinated Biphenyl (PCB) remediation waste pursuant to 40 CFR § 761.61.a.**

Dear Mr. Lockhart and Mr. Duran:

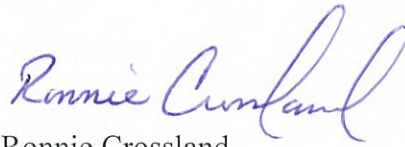
We are in receipt of your letter of March 18, 2019, in which you requested an extension of the 180-day storage requirement limit for PCB remediation waste which expired on March 23, 2019. This waste was generated in September 2018 from a 761.61a cleanup which was approved by the United States Environmental Protection Agency (EPA) Region 6 in June 2017. The remediated soil was placed in 56 DOT IP1 containers in Technical Area 02 in Middle Los Alamos Canyon (Solid Waste Management Unit 02-014). You requested that the EPA Region 6 office grant an extension for storage until March 1, 2020, and that during that period of extension you be granted an exemption from the monthly storage inspections for March through June of 2019. Your request is hereby approved pursuant to 40 CFR § 761.65(a)(4) based upon the following circumstances.

In your letter, you noted that LANL has experienced unusually heavy snowfall, which has prevented access for inspections to Technical Area 02 where the 56 DOT drums are stored on an elevated level parking lot which is fenced and gated. The drums are within a secondary containment structure, covered with tarps which are banded to the drums and pallets. Also, under the "Threatened and Endangered Species Habitat Management Plan for Los Alamos National

Laboratory”, Technical Area 02 has been placed under restricted access until August 31, 2019, due to the Mexican spotted owl breeding season.

If you have questions or comments, please contact Mr. James Sales of my staff at 214-665-6796.

Sincerely,



Ronnie Crossland  
Director  
Land, Chemical, and  
Redevelopment Division