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Environmental Management Los Alamos Field Office P.O. Box 1663, MS M984 Los Alamos, New Mexico 87545 (505) 257-7950/FAX (505) 606-2132

> Date: FEB 1 9 2020 Refer To: N3B-20-0030

Siona Briley, STP Project Manager Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505-6313

Subject: Request for Extension for Submittal of Los Alamos National Laboratory Site Treatment Plan, Fiscal Year 2019, Update and Proposed Revision 30.0, Federal Facility Compliance Order

Dear Ms. Briley:

The purpose of this letter is to request an extension for submittal of the Los Alamos National Laboratory Federal Facility Compliance Order Annual Site Treatment Plan (STP) Update and Proposed Revision 30.0 for Fiscal Year (FY) 2019 (FY 2019 STP Update). The U.S. Department of Energy (DOE) is required to submit an annual STP update to the New Mexico Environment Department (NMED) on or before March 31 of each year. The DOE Environmental Management Los Alamos Field Office (EM-LA) and the National Nuclear Security Administration Los Alamos Field Office (NA-LA) are working with their respective contractors (Newport News Nuclear BWXT-Los Alamos, LLC [N3B] and Triad National Security, LLC [Triad]; collectively known as the Respondents) to develop the FY 2019 STP Update.

Delays associated with the unapproved FY 2018 STP Update are impacting the preparation and finalization of the FY 2019 STP Update, as explained in more detail below.

DOE submitted the *Site Treatment Plan, Fiscal Year 2018 Annual Update and Proposed Revision 29.0* to NMED on December 12, 2019; however, NMED has not yet approved this submittal. NMED approval commonly takes a minimum of 3 months and includes a 30-day public comment period. This schedule does not leave enough time to develop and finalize the FY 2019 STP Update for submittal to NMED by March 31, 2020.

Additional time for submittal of the FY 2019 STP Update is required for the Respondents to verify and validate the data after NMED approval of the FY 2018 STP Update. The FY 2019 data are calculated using the final FY 2018 data. Normally, the annual STP update work begins in December and is submitted by March 31, a total of 4 months. The Respondents' intent is to deliver a highquality submittal, and believe an additional 90 days is necessary to complete the FY 2019 STP Update.

For the reasons above, the Respondents respectfully request an extension to submit the FY 2019 STP Update dependent upon the date of NMED's final approval notification of the FY 2018 STP Update. The Respondents will submit the FY 2019 STP Update 90 days after approval notification is received from NMED for the FY 2018 STP Update.

The FY 2020 STP Update is anticipated to be submitted on schedule by March 31, 2021.

If you have any questions, please contact Jennifer von Rohr at (505) 695-4365 (jennifer.vonrohr@em-la.doe.gov) or Elizabeth Churchill at (505) 257-7905 (elizabeth.churchill@em.doe.gov).

Sincerely,

Jennifer von Rohr STP Project Manager Environment, Safety and Health N3B-Los Alamos

Sincerely,

Elizabeth Churchill (STP Project Manager Environmental Management Los Alamos Field Office

cc (letter emailed): Laurie King, EPA Region 6, Dallas, TX Siona Briley, NMED-HWB Neelam Dhawan, NMED-HWB Kevin Pierard, NMED-HWB Karen Armijo, NA-LA William Goodrum, NA-LA Peter Maggiore, NA-LA Adrienne Nash, NA-LA Jody Pugh, NA-LA Darlene Rodriguez, NA-LA Lee Bishop, EM-LA Elizabeth Churchill, EM-LA Arturo Duran, EM-LA Jesse Kahler, EM-LA David Nickless, EM-LA Cheryl Rodriguez, EM-LA Pete Carson, LANL Michael Hazen, LANL William Mairson, LANL Ellena Martinez, LANL Avril Millensted, LANL Patrick L. Padilla, LANL

Sandra Story-Hughes, LANL Enrique Torres, LANL William Alexander, N3B Carol Anderson, N3B Victoria Baca, N3B Lacey Bruaw, N3B Stacie Burke, N3B Emily Day, N3B Mary Erwin, N3B Ellen Gammon, N3B Stephanie Q. Griego, N3B Debby Holgerson, N3B Kim Lebak, N3B Joseph Legare, N3B Dana Lindsay, N3B Frazer Lockhart, N3B Elizabeth Lowes, N3B Pamela Maestas, N3B Jason Moore, N3B Glenn Morgan, N3B Gerald O'Leary, N3B Gary Pool, N3B Ben Roberts, N3B Randy Sandoval, N3B Bradley Smith, N3B Tashia Vigil, N3B Jennifer von Rohr, N3B epc-correspondence@lanl.gov rcra-prr@lanl.gov emla.docs@em.doe.gov n3brecords@em-la.doe.gov Public Reading Room (EPRR) 3