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Date: **MAR 02 2020**
 Refer To: N3B-20-0049

Kevin Pierard, Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505-6313

Subject: Submittal of Dome Repair Completion Notification in Response to Notice of Violation, Los Alamos National Laboratory, EPA ID No. NM0890010515, Dated March 27, 2019

Dear Mr. Pierard:

In accordance with the April 22, 2019, extension request approval letter from the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB), "Approval: Extension Request for Repairs to the Damaged Domes 229 and 230 Located at TA-54," concerning the March 27, 2019, Notice of Violation, Los Alamos National Laboratory, EPA ID No. NM0890010515, the U.S. Department of Energy (DOE) Environmental Management Los Alamos Field Office (EM-LA) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B) (the Permittees) are submitting to NMED-HWB this completion notification for repair of Domes 229 and 230.

The notice of violation specified that the Permittees failed "to remedy any deterioration or malfunction of equipment or structures discovered during an inspection which may lead to an environmental or human health hazard and mitigate such deterioration or malfunction within 24 hours of discovery of the problem, which is a violation of Permit Section 2.6.2. Specifically, to date LANL has not repaired the damage to the domes." The repairs were required after weather-related damage occurred in early January 2019.

On April 4, 2019, in accordance with the notice of violation, the Permittees submitted a letter to NMED requesting a formal extension to December 31, 2019, to complete repairs on the domes (letter number N3B-19-0101). The extension was necessary to accommodate the repair subcontractor's schedule. NMED approved the extension request in the letter dated April 22, 2019, and requested monthly updates to the repairs, which were submitted by the Permittees by the fifth day of each month.

Repairs were completed for both domes by December 31, 2019. As of November 27, 2019, all 39 panels had been replaced on each dome, satisfying the commitment to complete repairs to both domes by December 31, 2019. The Permittees will continue to ensure inspections are performed as required in accordance with Resource Conservation and Recovery Act (RCRA) Permit Section 2.6.1 and that repairs or corrective actions for deficiencies are performed as required by RCRA Permit Section 2.6.2, which requires repair of equipment and structures, as well as Section 3.5, which requires that hazardous waste containers be protected from contact with precipitation.

If you have comments or questions, please contact Elizabeth Lowes at (505) 309-1134 (elizabeth.lowes@em-la.doe.gov) or Arturo Duran at (505) 257-7907 (arturo.duran@em.doe.gov).

Sincerely,



Elizabeth Lowes
Program Manager
Environment, Safety and Health
N3B-Los Alamos

Sincerely,



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

cc (letter emailed):

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