



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 22, 2020

Kirk Lachman, Manager
Department of Energy-EM-LA
Los Alamos Field Office
P.O. Box 1663, MS M984
Los Alamos, NM 87545

Joseph Murdock, Program Manager
Environment, Safety and Health
Newport News Nuclear BWXT-Los Alamos
1200 Trinity Drive, Suite 150
Los Alamos, NM 87544

**RE: APPROVAL
REQUEST TO USE EQUIVALENT EPA METHOD FOR MEASURING PH AT TECHNICAL AREA
54, DOME 231
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-19-032**

Dear Messrs. Lachman and Murdock:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and the Newport New Nuclear BWXT-Los Alamos (N3B) (collectively the Permittees) *Request to Use an Equivalent U.S. Environmental Protection Agency Method for Measurement of Potentiometric pH in the Waste Processes in Dome 231 for the Los Alamos National Laboratory Hazardous Waste Facility Permit* (Request) dated and received October 8, 2020, and referenced by N3B-2020-0345.

The Permittees have submitted this Request to NMED as an equivalent method to EPA SW-846 9040C as specified in Permit Attachment C, Subsection C.3.2.4.1, for NMED's approval. The Permittees are proposing to use a HALO Smart Electrode HI12302 polyetherimide gel-filled Bluetooth for potentiometric pH measurements to establish the initial and final pH during permitted neutralization processes.

NMED has reviewed Enclosures 1 Letter of Equivalency from the Manufacturer, and Enclosure 2 Standard Operating Procedure from the Manufacturer and hereby approves of the Request.

The Permittees should proceed with providing a Permit Modification to Update Permit Attachment C with the updated pH measurement tools and procedures.

If you have any questions regarding this letter, please contact Siona Briley of my staff at (505) 476-6049.

Sincerely,

**Kevin
Pierard**

Digitally signed by
Kevin Pierard
Date: 2020.10.22
14:14:51 -06'00'

Kevin M. Pierard, Chief
Hazardous Waste Bureau

cc:

N. Dhawan, NMED HWB
S. Briley, NMED HWB
M. Schatz, NMED HWB
L. King, US EPA Region 6
A. Duran, EM-LA
K. Armijo, NA-LA
S. Story-Hughes, NA-LA
E. Day, N3B
E. Torres, Triad
P. Padilla, Triad
P. Maestas, N3B
W. Alexander, N3B
emla.docs@em.doe.gov
n3brecords@em-la.doe.gov
rcra-prr@lanl.gov

File: 2020 LANL Permit, Approval to Use Equivalent pH Method to EPA SW-846 9040C
LANL-19-032