



Michelle Lujan Grisham
Governor

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Lt. Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 16, 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: CLARIFICATION
APPROVAL OF THE 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:

On October 22, 2020 NMED approved the United States Department of Energy (DOE) and the Newport News 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 requested to use an equivalent method to EPA SW-846 9040C method as permitted by LANL RCRA Permit, Attachment C, Subsection C.3.2.4.1. The Permittees proposed to use a HALO Smart Electrode HI12302 polyetherimide gel-filled Bluetooth for potentiometric pH measurements to establish the initial and final pH during the permitted neutralization processes.

In the approval letter, NMED directed the Permittees to proceed with submitting a permit modification to update Attachment C of the Permit. Subsequently, NMED had discussions with the Permittees and concurred that a permit modification is not required because the use of

alternate method has been approved by NMED in accordance with the Permit. Section C.3.2.4.1 of the Permit allows use of an alternative method if approved by NMED.

Please note that the approval is only applicable to the method mentioned above. In the future, if the Permittees' wish to use another equivalent method, NMED's approval must be obtained prior to use.

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: 2020.12.16
17:06:33 -07'00'

Kevin M. Pierard, Chief
Hazardous Waste Bureau

cc:

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File: 2020 LANL Permit, Clarification on Approval to Use Equivalent pH Method
LANL-19-032