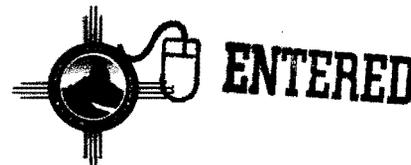




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TAO (



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Date: July 17, 2009
Refer To: EP2009-0331

James P. Bearzi, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Request for Extension for Installation of Retention Ponds in the Los Alamos Site Monitoring Area 2 Drainage

Dear Mr. Bearzi:

Los Alamos National Laboratory (the Laboratory) requests an extension to the installation of retention ponds in the Los Alamos Site Monitoring Area 2 (LA-SMA-2) drainage. We are in receipt of the approval with modifications letter, dated May 5, 2009, for the LA-SMA-2 interim measure and monitoring plan to mitigate contaminated sediment transport in Los Alamos Canyon. Based on discussions between Laboratory and New Mexico Environment Department (NMED) personnel that took place during a site visit on July 9, 2009, we will put interim stormwater controls in place as soon as possible but propose delaying construction of the retention basins until the end of monsoons. This schedule is being proposed to minimize the potential for migration of polychlorinated biphenyl- (PCB-) contaminated sediments from the site in the event of heavy rains during earth-moving activities. Delaying excavation of the ponds until early fall will also allow the currently saturated sediments to dry out, simplifying removal and transportation of excavated material and reducing the risk of unintentional release of remediation waste. Additionally, the retention ponds are planned for the same area where the majority of the PCB-contaminated sediments requiring removal are located. Therefore, the Laboratory requests that NMED extend the deadline for constructing the retention ponds from August 1, 2009, to December 31, 2009, to coincide with the schedule for sediment removal from the drainage below Solid Waste Management Unit (SWMU) 01-001(f). As discussed during the site visit and presented in the Upper Los Alamos Canyon Aggregate Area investigation report, submitted to NMED in June 2009, removal of contaminated tuff from the drainage is also necessary. Removal of the contaminated tuff may require additional time beyond December 31, 2009, but will not delay delivery of the final report, to be submitted to NMED by May 1, 2010.

Interim stormwater controls will be installed during the monsoon season to mitigate contaminant migration until the remediation can be conducted and retention ponds built. These interim actions include the placement of juniper bales in additional locations within the main flow channel. These bales will be wrapped in filter fabric and secured in place with stakes. Existing juniper bales will be restaked as necessary. Fiber filtration tubes (Terra-tubes or similar) will extend from the juniper



bales to retain sediment in the deposition zone outside of the main channel. The upstream culvert will be monitored and cleared as necessary to prevent additional flows to the site. The need for other stormwater control measures, such as log check dams and rock rip-rap, will be evaluated following installation of the juniper bales and fiber filtration tubes if flow dissipation is not adequate.

Participants in the July 9 site visit assessed the feasibility of installing run-on controls at the head of the drainage. Although action item 2 of the May 2009 approval with modifications letter requires prevention of contaminant migration from the mesa top to the drainage, it would necessitate extensive modification to private property, as was observed during the site visit. Therefore the Laboratory proposes to focus on site remediation and stabilization activities in the drainage. These proposed actions include risk-based removal of sediment and tuff per Section VIII.B.1.a of the Consent Order, based on a current and anticipated future recreational land use, and construction of retention ponds and other stormwater controls to minimize migration of sediment from the site.

We appreciated the opportunity to visit the site with NMED and discuss the actions required to mitigate PCB contamination in and migration from SWMU 01-001(f). We agree this is an important remediation effort and look forward to working with NMED to ensure an effective and timely remedy. If you have any questions, please contact Becky Coel-Roback at (505) 665-5011 (becky_cr@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (crodriguez2@doeal.gov).

Sincerely,



Michael J. Graham, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,



David R. Gregory, Project Director
Environmental Operations
Los Alamos Site Office

MG/DG/DM/BCR:sm

Cy: Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-OB, White Rock, NM
Tom Skibitski, NMED-OB, Santa Fe, NM
Keyana De Aguero, DOE-LASO (date-stamped letter emailed)
Cheryl Rodriguez, DOE-LASO, MS A316
Becky Coel-Roback, EP-CAP, MS M992
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EP-CAP File, MS M992
EP-LWSP File, MS M992
RPF, MS M707
Public Reading Room, M992
IRM-RMMSO, MS A150 (date-stamped letter emailed)