

TA16



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Date: May 15, 2007  
Refer To: ENV-RCRA: 07-108

Mr. John E. Kieling  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505

**Subject: Request for Extension to Submit Air Dispersion Modeling Report for  
Technical Area (TA) 16 at Los Alamos National Laboratory (LANL)**

Dear Mr. Kieling:

This letter requests an extension for the completion of documents in response to a Notice of Deficiency (NOD) dated April 18, 2007 from James Bearzi of the New Mexico Environment Department (NMED) to Daniel Glenn of the National Nuclear Security Administration Los Alamos Site Office (LASO) and Richard Watkins (LANL). The NOD made comments on the "TA-16 Burn Ground Air Pathway Assessment Protocol," (LA-UR-07-1986) which was submitted to the NMED on March 30, 2007. The NOD requires that a revised protocol document, the model's input/output parameters, results of the modeling, and analysis of the model results be submitted by June 1, 2007. In response to the NOD, we are preparing three documents: a response to the comments in the NOD, a revised modeling protocol document, and a modeling report. The first two documents will be submitted on time; however, we request that an extension be granted for the submittal of the modeling report.

Some of the comments within the NOD were refined during a conference call on April 26, 2007 between Rebecca Kay and Steve Pullen of your staff, Michael Smith of TechLaw Inc., Gene Turner (LASO), and members of my staff. During the conference call, LANL agreed to clarify some technical issues for the air dispersion pathway analysis, perform an extensive analysis on the effects of plume rise, as well as submit an updated ground level deposition analysis. The revised protocol document has been changed extensively and represents an increase in the scope of the TA-16 air pathway assessment. Consequently, the activities that are described in the modeling protocol document will not be completed in time; therefore, more time to complete the modeling report is necessary.

The modeling report will include dispersion and deposition modeling, documentation of input/output parameters, modeling results, and the impacts analysis based on the modeling results. Based on the changes to the revised protocol, we request that the deadline for completion of the model report be extended to July 20, 2007. We recognize that the NMED would like the modeling report submitted



as soon as possible for consideration as part of the development of the draft renewed LANL hazardous waste facility permit and we would like to emphasize that we are committed to completing our air pathway assessment for TA-16 as soon as we reasonably can.

If NMED has any additional comments or changes to the new version of the modeling protocol, we would request that a meeting be held to discuss the changes and impact on the schedule with your office. If you would like to discuss this matter further, please do not hesitate to contact Jack Ellvinger, Environmental Protection Division, at (505) 667-0633.

Sincerely,

  
Anthony R. Grieggs  
Group Leader  
Water Quality & RCRA (ENV-RCRA) Group

ARG/LVH:tag

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Rebecca Kay, NMED, Santa Fe, NM  
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