Los Alamos
NATIONAL LABORATORY
EST. 1943

Associate Director for ESH
Environment, Safety, and Health
P.O. Box 1663, MS K491
Los Alamos, New Mexico 87545
505-667-4218/Fax 505-665-3811

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SEP 18 2015
NMED
Hazardous Waste Bureau

Environmental Management
Los Alamos Field Office, MS A316
3747 West Jemez Road
Los Alamos, New Mexico 87544
(505) 665-5658/FAX (505) 606-2132

Date: SEP 18 2015
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Locates Action No.: N/A

John Kieling, 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 to Deploy Tracers at Consolidated Unit 16-021(c)-99

Dear Mr. Kieling:

Los Alamos National Security, LLC (LANS) and the U.S. Department of Energy (DOE) request an extension from the September 30, 2015, date to deploy tracers for the tracer test at Consolidated Unit 16-021(c)-99, as identified in the July 2015 Work Plan for a Tracer Test at Consolidated Unit 16-021(c)-99, Technical Area 16, Revision 1, to a new date of December 18, 2015.

This extension is being requested because of delays in completing predecessor activities, including obtaining regulatory approval of notices of intent (NOIs) to conduct the groundwater and surface water tracer tests and obtaining the necessary tracers. NOIs addressing the tracer tests were submitted to the New Mexico Environment Department (NMED) Ground Water Quality Bureau (GWQB) and Surface Water Quality Bureau (SWQB) on July 28, 2015, and August 6, 2015, respectively. Both bureaus requested additional information on the two respective NOIs, and DOE/LANS have responded to those requests. A determination that no discharge permit is required for the groundwater tracer tests has not yet been received from the NMED-GWQB. The NMED-SWQB responded in a September 11, 2015, letter that neither approved nor disapproved the use of tracers but advised DOE/LANS to contact U.S. Environmental Protection Agency (EPA) Region 6 to inquire whether a federal permit may be required. DOE/LANS contacted Mr. Brent Larson of EPA Region 6 on September 14, 2015, but to date have not received a response.

Once the technical issues are resolved and upon receipt of a response from NMED-GWQB that no discharge permit is required, DOE/LANS will begin the tracer tests by conducting dilution tests in the wells where tracers will be introduced. Preparation for and completion of the dilution tests will take approximately 6 weeks. The primary groundwater tracer will be introduced into each well after the dilution test is completed.

Introduction of the surface water tracer into Cañon de Valle is dependent on a determination by the EPA Region 6 that a federal permit is not required. If an EPA permit is required, other options will have to be considered, including possibly cancelling the surface water tracer test.

Finally, the tracers were ordered from a specialized chemical manufacturer in China shortly after NMED approved the tracer test work plan, and delivery is expected by September 23, 2015. However, this will not provide adequate time to deploy the tracers by the end of the month.

Because regulatory determinations by NMED and EPA are pending and the tracers have not been received, deployment of the tracers in all wells and in the Cañon de Valle stream by September 30, 2015, is not feasible. The additional time provided by extending the deployment deadline for the tracers to December 18, 2015, should be sufficient to conduct the dilution tests and introduce all groundwater tracers and the surface water tracer, if the NOIs are approved and the tracers are received in September 2015.

If you have any questions, please contact Stephani Swickley at (505) 606-1628 (sfuller@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (cheryl.rodriguez@em.doe.gov).

Sincerely,

Alison M. Dorries, Division Leader
Environmental Protection Division
Los Alamos National Laboratory

Sincerely,

Christine Gelles, Acting Manager
Environmental Management
Los Alamos Field Office

AD/CG/SS:sm

Cy: (date-stamped letter emailed)
Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-DOE-OB, MS M894
lasomailbox@nnsa.doe.gov
Kimberly Davis Lebak, DOE-NA-LA
Peter Maggiore, DOE-NA-LA
emla.docs@em.doe.gov
Annette Russell, DOE-EM-LA
Cheryl Rodriguez, DOE-EM-LA
David Rhodes, DOE-EM-LA
Brent Newman, EES-14
Tim Goering, ADEP ER Program
Danny Katzman, ADEP ER Program
Stephani Swickley, ADEP ER Program
Bruce Robinson, ADEP ER Program
Randy Erickson, ADEP
Jocelyn Buckley, ADESH-ENV-CP
Bob Beers, ADESH-ENV-CP
Mike Saladen, ADESH-ENV-CP
Tony Grieggs, ADESH-ENV-CP
Alison Dorries, ADESH-ENV-DO
Michael Brandt, ADESH
Amy De Palma, PADOPS
Craig Leasure, PADOPS
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