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Date: June 30, 2005  
 Refer To: ER2005-0250

Mr. James Bearzi  
 NMED – Hazardous Waste Bureau  
 2905 Rodeo Park Drive East  
 Building 1  
 Santa Fe, NM 87505-6303

**SUBJECT: REQUEST FOR EXTENSION FOR INVESTIGATION REPORT FOR SOLID WASTE MANAGEMENT (SWMU) UNIT 21-015, MATERIALS DISPOSAL AREA B (MDA B)**



Dear Mr. Bearzi:

We submitted revised portions of the investigation work plan for SWMU 21-015 MDA B to New Mexico Environment Department (NMED) on May 6, 2005 in accordance with the state's comments and requests. The transmittal letter also indicated that a request for a revised submittal date would follow. This letter requests a revised submittal date for the investigation report in accordance with the NMED Compliance Order on Consent, Section III J. 2. The current date for submission of the report is January 31, 2006 (Table XII-2) which was based on the Consent Order's minimum characterization requirements.

The MDA B investigation work plan initially proposed an investigation with 8 trenches through the MDA B wastes, to be completed 16 months following approval of the work plan. The December 21, 2004 NMED Approval with Modification added 4 additional investigation trenches and two deep boreholes. The approved investigation is not the conventional sampling and analyses associated with boreholes into surrounding soils and bedrock. The MDA B investigation is focused on determining the types and quantities of wastes present at MDA B and the extent that any residual contamination may have migrated. The investigations are difficult and dangerous. They will require safety controls and complex waste management activities well beyond those required for sampling environmental media.

In contrast to more conventional characterization where sampling is accomplished by routine soil borings, a substantial amount of waste material must first be removed and managed before samples can be collected from the periphery of each trench. Once the underlying and presumably undisturbed, media beneath the trenches is exposed, sampling will follow. It is estimated that each trench will result in removal and management of up to 300 cubic yards of waste and overburden. Engineered safety controls will limit the amount of waste material exposed in open trenches or being handled at any one time in accordance with nuclear safety requirements. It is



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reasonably estimated that 2 months will be required for each trench after mobilization. After the trenches are complete and the characterization data is available, the 2 deep boreholes will be installed to maximize the information concerning potential nature and extent of contaminant releases from the waste trenches. The boreholes cannot be properly located without the characterization data from the bottoms of the trenches.

As a result of the added scope and engineering processes, LANL requests a new submission date for the investigation report of January 31, 2008. This date is realistic considering the safety requirements to protect workers and the public, and the quality of data that will be collected to support future decisions. We will make every effort to complete the investigations and submit the investigation report prior to this date. As planned, the Laboratory will inform NMED of progress made in the investigations once they begin.

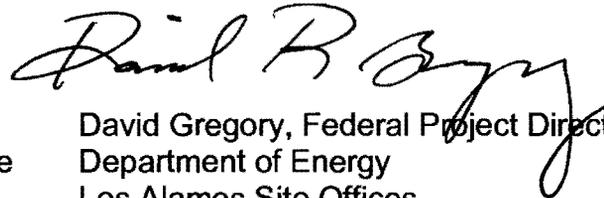
If you have any questions regarding this matter, please call Bill Criswell at 665-5886, Mitch Goldberg at 665-4567 or Woody Woodworth at 665-5820.

Sincerely,



David McInroy, Deputy Program Director  
Environmental Remediation & Surveillance  
Los Alamos National Laboratory

Sincerely,



David Gregory, Federal Project Director  
Department of Energy  
Los Alamos Site Offices

DM/DG/CWC/ds

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