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National Nuclear Security Administration
 Los Alamos Site Office, MS A316
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Date: April 1, 2009
Refer To: EP2009-0180

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 Approval of Expanded Boundaries for Areas of Contamination for the Investigation and Remediation of Solid Waste Management Units 39-001(a) and 39-001(b) at Technical Area 39

Dear Mr. Bearzi:

The purpose of this letter is to request approval for expanding the boundaries of area of contamination designations for the investigation and remediation of Solid Waste Management Units (SWMUs) 39-001(a) and 39-001(b). These changes were discussed with Dave Cobrain and Kathryn Roberts of your staff on their March 2, 2009, site visit to Los Alamos National Laboratory (the Laboratory). As discussed during their site visit, the size of the disposal pits in SWMU 39-001(a) and the amount of soil mixed with debris in the disposal pits are greater than expected. The Laboratory predicts the same will be true for the disposal pits at SWMU 39-001(b). The primary purpose of requesting the modified area of contamination boundaries is to facilitate staging the excavated debris and soil mixture, segregating debris from the soil, and reusing the soil as backfill in the pits if it meets residential screening levels. The expanded boundaries will provide the space needed to manage the larger-than-expected quantities of waste and soil within the area of contamination boundary associated with each SWMU without triggering a new point of generation or placing waste subject to Resource Conservation and Recovery Act requirements.

The current boundaries of the areas of contamination were approved by the New Mexico Environment Department in a letter dated December 30, 2008. The Laboratory proposes that the boundaries of the area of contaminations be modified to include the areas shown on the site maps in the attached figures. The Laboratory is requesting that the modified area of contamination determinations be effective through the completion of the investigation and remediation activities at the site.

After the debris is segregated from the soil, the debris will be dispositioned as waste. The soil will be sampled and analyzed as needed for volatile organic compounds, semivolatile organic compounds, target analyte list metals, cyanide, nitrates, high explosives (if screening detects their



presence), perchlorates, radionuclides, polychlorinated biphenyls, and toxicity characteristic metals. The analytical results will be used to ensure only environmental media with contaminant concentrations less than background or residential cleanup levels will be returned to the disposal pits. The environmental media returned to the excavation will be placed in the deeper portions of the excavation in the same SWMU from which it was removed.

All staging and segregation of waste and environmental media on-site will be conducted in an environmentally protective manner, using a combination of containers and appropriately designed and controlled (e.g., bermed, covered) staging piles. Materials will be containerized and managed in full accordance with regulatory requirements upon transfer outside of the area of contamination boundary.

If you have any questions, please contact John McCann at (505) 665-1091 (jmccann@lanl.gov) or Suzy Schulman at (505) 606-1962 (sschulman@doeal.gov).

Sincerely,



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

Sincerely,



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

MG/DG/DM/JM:sm

Attachment: Site Maps Designating Areas of Contamination (LA-UR-09-1994)

Cy: Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-OB, White Rock, NM
Tom Skibitski, NMED-OB, Santa Fe, NM
Keyana DeAgüero, DOE-LASO (date-stamped letter emailed)
Suzy Schulman, DOE-LASO, MS A316
John McCann, EP-CAP, MS M992
Dave McInroy, EP-CAP, MS M992
Michael J. Graham, ADEP, MS M991
Alison M. Dorries, EP-WES, MS M992
Kristine Smeltz, EP-WES, MS M992
EP-CAP File, MS M992
RPF, MS M707
IRM-RMMSO, MS A150 (date-stamped letter emailed)

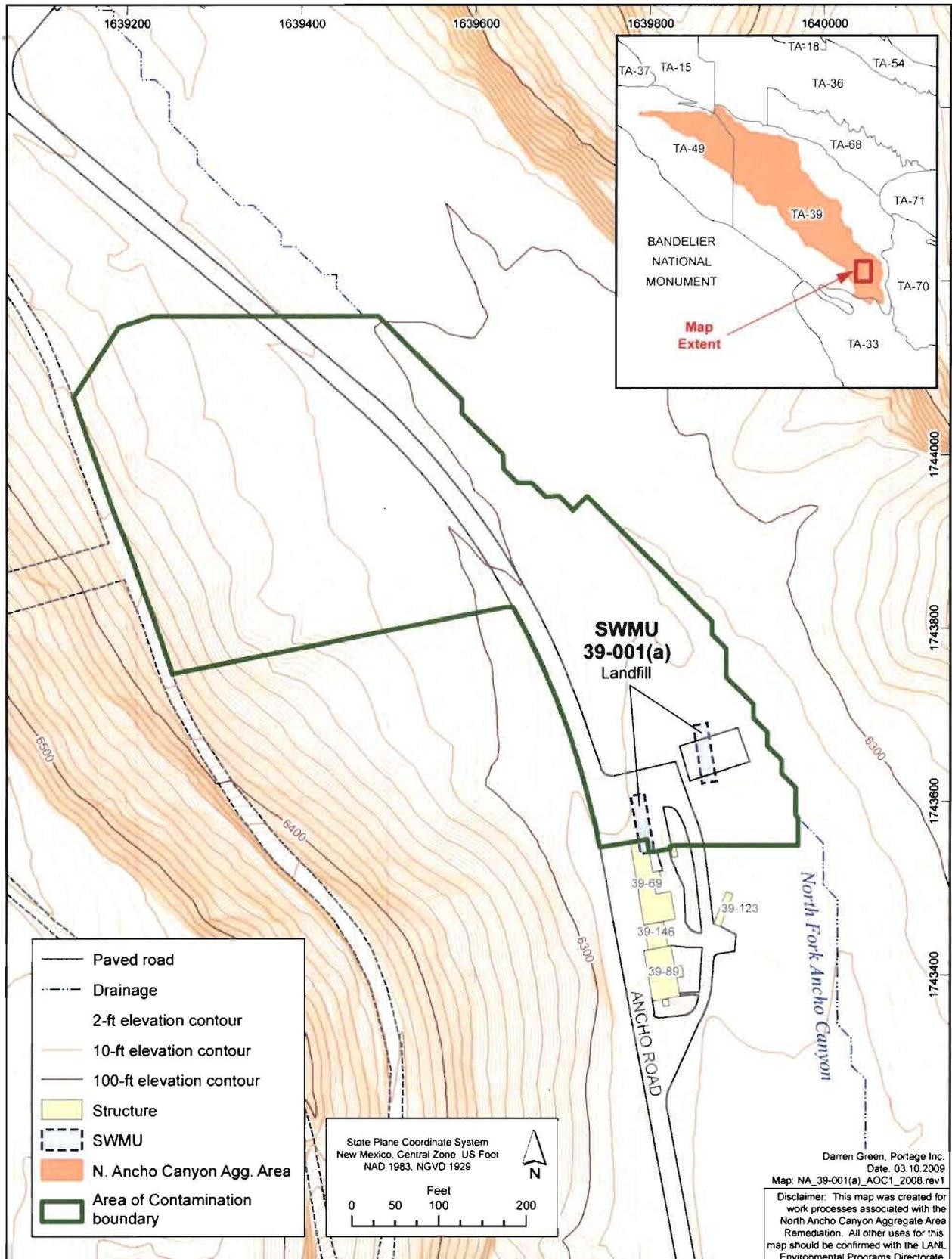


Figure 1 Area of Contamination boundary for SWMU 39-001(a)

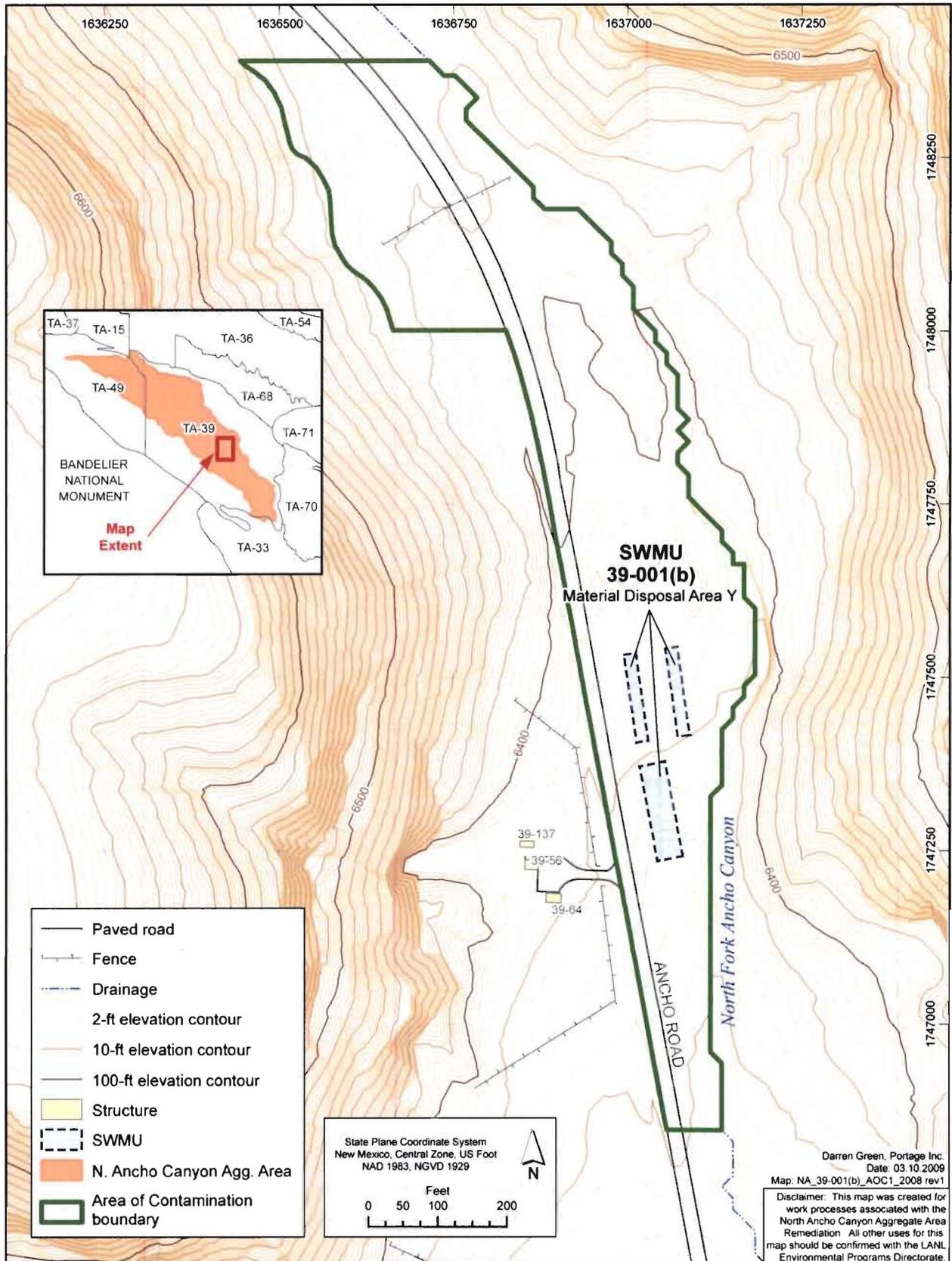


Figure 2 Area of Contamination boundary for SWMU 39-001(b)