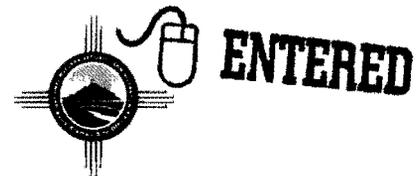




Environmental Programs
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National Nuclear Security Administration
Los Alamos Site Office, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
(505) 667-4255/FAX (505) 606-2132

Date: June 12, 2009
Refer To: EP2009-0284

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 to Complete the North Ancho Aggregate Area Investigation Report

Dear Mr. Bearzi:

Los Alamos National Laboratory's (LANL) Environmental Programs Directorate is requesting an extension for the delivery date associated with the North Ancho Aggregate Area Investigation Report. The work plan for this field campaign that was approved by the New Mexico Environment Department included the removal and waste disposal of generated waste from of Solid Waste Management Units (SWMUs) 39-001(a) and 39-001(b), Material Disposal Area (MDA) Y, and SWMU 39-006(a), an inactive septic system. During the course of these excavations, three significant changes in field conditions occurred resulting in impacts to the project's schedule of completion. These changes in field conditions were discussed with Katie Roberts of your staff via telephone as they were encountered. They include the following:

1. The discovery of unknown liquids in bottles and other containers that required work to be stopped to evaluate the hazards to workers and the environment. Removal of these unknown liquids was beyond the scope of the NMED-approved work plan. Upon discovery of unknown liquids, work is stopped per procedure until LANL Emergency Management and Response (EM&R) removes the containers from the work zone and places them into a safe configuration. Following the discovery of unknown liquids at MDA Y, integrated work documents were revised to incorporate procedures used to address these hazards and to restart the work. Per the updated procedures, the excavation process was slowed to expose material before it was removed to allow for assessment of the containers and to reduce the potential impact of inadvertent releases to the environment. Several work stoppages were required to allow EM&R to respond to unknown liquids. All liquids were processed per waste management procedures.
2. Discovery of active utilities overlying the septic tank portion of SWMU 39-006(a), which were unknown until excavation started. This discovery resulted in delays to ensure communication lines related to emergency alarms were not harmed and that active septic lines were not harmed causing the disruption of sewage service. To ensure uninterrupted



service to operational facilities, excavation of the septic tank required disconnecting and repairing these utilities as part of the excavation process.

3. The extent and volume of the pits at SWMUs 39-001(a) and 39-001(b) in excess of that anticipated based on historical records and field investigations. At both historical disposal locations, multiple pits were not encountered, as identified in the approved work plan. Rather, the disposal areas consisted of contiguous waste at depths greater than 15 ft below ground surface and extended laterally greater than anticipated. This required the excavator to perform benching to safely reach the material to be removed. This development led to generation of waste volumes and the need to expand the area of contamination for waste management purposes. The expansion of the area of contamination was approved in your letter of April 6, 2009 (HWB-LANL-07-028).

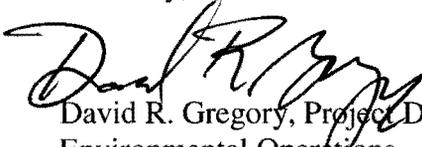
The time required to adjust to these changes in field conditions was approximately 68 days. The final sample of this field campaign was taken during the week of June 1, 2009. To prepare a complete investigation report for this effort, LANL respectfully requests NMED grant a 2-month extension from the current due date of July 31, 2009, to September 30, 2009. A detailed schedule to complete the investigation report is attached.

If you have any questions, please contact John McCann at (505) 665-1091 (jmccann@lanl.gov) or Suzanne Schulman at (505) 606-1962 (sschulman@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/JM:sm

Attachment: Revised schedule to complete the investigation report for the North Ancho Aggregate Area

Cy: Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-OB, White Rock, NM
Tom Skibitski, NMED-OB, Santa Fe, NM
Ken Kisiel, Portage Environmental, Los Alamos, NM
Keyana DeAgüero, DOE-LASO (date-stamped letter emailed)
Suzanne 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 M996
Kristine Smeltz, EP-WES, MS M992
EP-CAP File, MS M992
RPF, MS M707
IRM-RMMSO, MS A150 (date-stamped letter emailed)

Activity ID	Activity Name	Original Duration	Start	Finish	2009											
					Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	
Project Lvl-6: INDUSTRIAL SITES		171	29-Jan-09	30-Sep-09												
Control Account Lvl-7: NORTH ANCHO		171	29-Jan-09	30-Sep-09												
Work Package Lvl-8: D1 NORTH ANCHO AGGREGATE AREA FIELD WORK		171	29-Jan-09	30-Sep-09												
B561D10452	Sample Collection	86	29-Jan-09*	01-Jun-09												
B561D10437	Waste Management	171	29-Jan-09*	30-Sep-09												
B561D10433	Excavation & Segregation	86	29-Jan-09*	01-Jun-09												
B561D10454	Sample Analysis	91	19-Feb-09	26-Jun-09												
B561D10443	Receive Sample Data & Validate	62	03-Apr-09	30-Jun-09												
B561D10436	Backfill	5	02-Jun-09	08-Jun-09												
B561D10448	Demobilization	4	25-Sep-09	30-Sep-09												
Work Package Lvl-8: D2 NORTH ANCHO AGGREGATE AREA INVESTIGATION R...		94	19-May-09	30-Sep-09												
B561D20404	Data Reduction & Assessment	40	19-May-09	15-Jul-09												
B561D20410	Prepare Draft Report	40	05-Jun-09	31-Jul-09												
B561D20414	Prepare and Conduct Decision Peer Review	10	03-Aug-09	14-Aug-09												
B561D20418	Finalize Draft Report	17	17-Aug-09	09-Sep-09												
B561D20420	Conduct DOE/Peer Review	5	10-Sep-09	16-Sep-09												
B561D20424	Incorporate DOE/Peer Review Comments	10	17-Sep-09	30-Sep-09												
B561D20426	Submit Report to NMED	0		30-Sep-09												