

TA 54
~~James~~
James

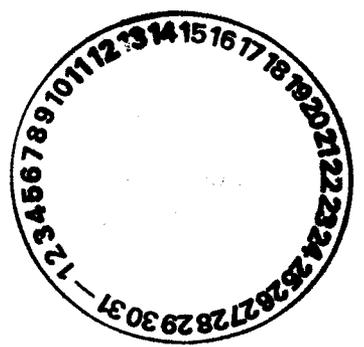


Hazardous & Solid Waste, ESH-19
Mail Stop K490
667-0633/Fax 667-5224

Date: February 11, 2002
Refer to: ESH-19:02-010

Hand Delivered
RETURN RECEIPT REQUESTED

Carl Will, Permitting
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303



Dear Mr. Will:

Subject: Request for Extension to Respond to the Determination of Incompleteness for:
1) "Closure and Post Closure Plans for TA-54-Area G Landfill, " September 1985;
2) "TA-54 Area H & Area L Landfill Closure and Post-closure Plan, "November 1986;
3) "Closure Plan for Technical Area 54, Material Disposal Area L" (Revision 1.0), March 1998;
4) Closure Plan for Technical Area 54, Material Disposal Area H" (Revision 1.0), March 1998.

Los Alamos National Laboratory EPA ID# NM0890010515

The purpose of this letter is to request a sixty (60) day extension to the above letter issued by the Hazardous Waste Bureau (HWB) regarding the Los Alamos National Laboratory's (LANL) Material Disposal Areas (MDA) located at Technical Area (TA) 54. In that letter LANL is required to provide a response by February 26, 2002.

As we discussed in our meeting with James Bearzi, John Kieling and yourself, this effort is going to require a substantial effort to pull together all of the pieces and details that are available at this point as well as attempting to address your concerns on our approach. We have concerns over coordination with activities that are currently approved by the HWB and underway by the Laboratory's Environmental Restoration Program for MDA-H involving the shift from closure and post closure care to corrective action through the endeavors of the High Performance Team.

We are also pulling together the data available from the modeling being completed and ongoing at TA-54, the storm water run-off program, the vadose zone monitoring and determining how the Hydrogeologic Workplan relates to the ground water monitoring requirements in the regulations. Addressing the issue of risk assessment for each of the individual MDAs is a substantial challenge. Additionally, the development of the requested crosswalks to establish where the corrective action program is fulfilling the requirements of closure and post-closure care is extensive.



February 11, 2002

We wish to be compliant to your requests but feel this particular request is pivotal to the Laboratory's future approach to closure, post closure and corrective action. Therefore, it is imperative that we spend the time necessary to correctly address the issues presented by the three MDAs located within TA-54. Therefore, we are requesting an additional sixty (60) days to develop a reply to your request.

Thank you for your consideration on this issue. If you should have any questions concerning this issue please feel free to contact me at 667-0633.

Sincerely,


Jack Ellvinger
ESH-19

JE/vh

Cy: ✓ James P. Bearzi
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

John Kieling, Program Manager,
Permits Management Program
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
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G. Turner, DOE/OLASO, MS A316
D. McInroy, E-ER Proj. Office, MS M992
J. Stetson, DOE/OLASO/PWT, MS A316
E. Louderbough, LANL, LC-GL, MS A187
G. Bacigalupa, LANL, ESH-19, MS K490
S. French, LANL, SWO/WFM, MS F691
IM-5, A150
ESH-19 File