



**Department of Energy**

Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
November 12, 2004

 **ENTERED**



Mr. Clint Marshall  
Ground Water Quality Bureau  
New Mexico Environment Department  
P.O. Box 26110  
Santa Fe, New Mexico 87502

**Subject:** Request for an Extension for the Salt Pile Infiltration Controls Construction Schedule, Discharge Plan - 831

Dear Mr. Marshall:

The purpose of this letter is to request an extension for completion of the scheduled activities for construction of the infiltration controls referenced in Discharge Plan – 831 (DP-831). The schedule contains six items which were to be completed by November 2004. Five of those six items have been completed on or before the scheduled date as reflected in the table below.

The construction and lining of the Salt Storage Extension, Salt Pile Evaporation Pond and Salt Storage Evaporation Basin with High Density Polyethylene (HDPE) and the placement of a HDPE cap to cover the Salt Pile have been completed. The remaining work includes the lining of the salt pile run-off ditches with HDPE, the placement of native soils and vegetative cover on the old Salt Pile, and the lining of Evaporation Basin A and Ponds 1 and 2 with HDPE. This work was anticipated to be complete in late September or early October, 2004. However, an unexpected 5.22 inches rain on the weekend of September 24-26, 2004 prevented the completion of these tasks. Due to the rainfall events that have occurred at the site, considerable rework will have to be done before the installation of HDPE material in these locations or placement of soil can resume.

Continued wet weather and low evaporation rates have prevented resuming construction activities. The completion of the salt pile run-off ditches will not be able to be completed as scheduled in November 2004. Stormwater Evaporation Basin A may not be able to be completed by the scheduled date of January 2005. The lining of Evaporation Ponds 1 and 2 remain on schedule for completion in April 2005.

For the reasons stated above we are requesting that the infiltration controls schedule be amended. The table below illustrates the scheduled dates referenced in DP-831 and a proposed schedule that we believe can be met.

<b>Construction Activity</b>	<b>Existing Schedule Referenced in DP-831</b>	<b>Proposed Schedule</b>
Place Contract	September 2003	NA (Task Accomplished)
Begin On-Site Construction	October 2003	NA (Task Accomplished)



Stormwater Diversion Berm Completion	December, 2003	NA (Task Accomplished)
Begin Storage of Mined Salt in Cell A	May 2004	NA (Task Accomplished)
Salt Pile 1) Completion of pond 2) Completion of ditches 3) Completion of liner cap	1) November 2004 2) November 2004 3) November 2004	1) NA (Task Accomplished) 2) April 2005 3) NA (Task Accomplished)
Stormwater Evaporation Basin A	January 2005	April 2005
Stormwater Evaporation Basin B (Ponds 1 and 2)	April 2005	April 2005
Salt Storage Extension Cell B	Begin Construction: May 2006 Completion: October 2006	Begin Construction: May 2006 Completion: October 2006

We have made a good faith effort to complete the installation of the infiltration controls in accordance with the schedule referenced in DP-831, as amended. The revised schedule presented herein is based on the following factors:

- 1) The difficulty associated with predicting when the area will be dry enough to resume construction activities considering we are entering the winter season when evaporation rates are low;
- 2) Acknowledgement that the liner subcontractor has several jobs that have been postponed due to the wet weather which will complicate scheduling once conditions are suitable for construction; and,
- 3) Completing the soil cover and reclamation activities associated with establishing vegetation on the covered salt pile will require a considerable volume of dry, screened soil material.

Currently, salt is stored in Cell A of the Salt Storage Extension Area and run-off from this area is contained in the Salt Storage Evaporation Basin, both of which are lined with HDPE. The old salt pile is capped with a HDPE material. We believe that these structures virtually eliminate the contribution of salt contact water to the subsurface.

Your consideration of our revised schedule is appreciated. If you have any questions or require additional information, please contact Mr. H. L. Plum at (505) 234-7495.

Sincerely,



Lloyd Piper  
Acting Manager

Mr. Clint Marshall

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November 12, 2004

cc:

C. Lundstrom, NMED \*ED

J. Bearzi, NMED \*ED

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\*ED denotes Electronic Distribution