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*Date:* July 31, 2008  
*Refer To:* EP2008-0400

Mr. James Bearzi  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6303

**Subject: Request for Extension to Submit the Corrective Measures Evaluation Report for Material Disposal Area G, Consolidated Unit 54-013(b)-99, at Technical Area 54**

Dear Mr. Bearzi:

Los Alamos National Laboratory's (the Laboratory's) Environmental Programs Directorate is requesting an extension for the due date of the Corrective Measures Evaluation Report for Material Disposal Area G, Consolidated Unit 54-013(b)-99, at Technical Area 54. This request for an extension is based on the need to support the remedy-selection decision process with additional groundwater data specific to Material Disposal Area (MDA) G.

The Laboratory is postured to submit a CME report that is fully compliant with the Consent Order by the required September 12, 2008, due date. However, the Laboratory recognizes and concurs with the New Mexico Environment Department's (NMED's) interest in having additional groundwater monitoring results as a key component of the CME decision process. The justification for this request for an extension is based not on the need for more time to complete the report but rather on the need to complete and integrate the groundwater-monitoring network, collect and analyze samples, incorporate these data into the corrective measures evaluation and remedy selection process, and present the results in a single, comprehensive report.

The Department has expressed interest on several occasions in having additional groundwater monitoring as a key component of the CME process. Specifically, in its April 5, 2007, letter (HWB-LANL:GW-MISC), NMED stated, "The Department is particularly concerned that not enough wells are currently available for regional groundwater monitoring at TA-54."

Additionally, in its December 7, 2007, letter (HWB-LANL-GROUNDWATER\_MISC), NMED stated, "The Permittees are currently conducting a Corrective Measures Evaluation (CME) at Material Disposal Area (MDA) G, and will submit the CME report for NMED review by September 12, 2008. The remedy selection for MDA H has been issued for public comment, and the CME Report for MDA L will be submitted by the Permittees to NMED by January 18, 2008. Selection of remedies at these sites will, in part, depend on the availability of reliable groundwater

monitoring data collected from an appropriately designed monitoring network surrounding Technical Area (TA)-54.”

Recently, in its June 2, 2008, Notice of Disapproval for the Corrective Measures Evaluation Report for Material Disposal Area L, Consolidated Unit 54-013(b)-99, at Technical Area 54 (HWB-LANL-08-001), NMED expressed the need for additional groundwater data to support the CME decision process. NMED concluded it could not evaluate alternatives, other than the most expensive, without reviewing the results of at least two groundwater monitoring events.

Pursuant to the April 5, 2007, letter, the Laboratory has prepared and received approval on the Technical Area 54 Well Evaluation and Network Recommendations, Revision 1. This evaluation recognized the need to supplement the existing monitoring-well network with additional wells for MDAs H, L, and G.

The groundwater data needed to support the CME process at MDA G will be derived from sampling at existing wells and at three new wells (R-39, R-41, and PCI-1) to be installed near MDA G (see Technical Area 54 Well Evaluation and Network Recommendations, Revision 1). These wells are described in the NMED-approved drilling work plan for regional and intermediate wells at Technical Area 54. The Laboratory will install these wells in fiscal year 2009 by the completion dates of February 28, 2009, for R-39; March 31, 2009, for R-41; and March 31, 2009, for PCI-1. These dates reflect the current construction plan for new wells based on priorities and on available contractors and drilling rigs.

In conclusion, the Laboratory is committed to an implementation schedule for MDA G that complies with the Consent Order and believes the proposed approach will ensure that compliance. We would like to submit one report that includes all information necessary to support a remedy recommendation, thus allowing for easier review by your office and the stakeholders. Therefore, we request a new submittal date of December 19, 2009, for the MDA G CME report. This submittal date assumes groundwater quality in newly constructed wells is consistent with existing wells and that groundwater remedial technologies do not need to be incorporated into the alternatives. This extension will accommodate the well completions at R-39, R-41, and PCI-1 and provide the time to collect and evaluate two rounds of groundwater data, sampled approximately 3 months apart, from new and existing wells to include in the MDA G report. This date assumes that the first samples will be collected in May 2009 and that the second round will be collected in August 2009.

If you have any questions, please contact Steve Paris at (505) 606-0915 (smparis@lanl.gov) or Ed Worth at (505) 665-0398 (eworth@doeal.gov).

Sincerely,



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Sincerely,



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