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Date: **NOV 13 2009**
Refer To: EP2009-0594



James 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 Time Extension for Submittal of Delta Prime Site Aggregate Area Phase II Investigation Report

Dear Mr. Bearzi:

This letter requests a 60-day extension from January 31, 2010, to April 1, 2010, for Los Alamos National Laboratory (the Laboratory) to submit the Delta Prime Site Aggregate Area Phase II investigation report. The revised Delta Prime Site Aggregate Area Phase II work plan, which included the schedule for the Phase II investigation report, was approved by the New Mexico Environment Department (NMED) on January 12, 2009. The extension request is based on additional preexcavation sampling conducted and verification sampling requirements imposed by the U.S. Environmental Protection Agency (EPA) Region 6 after NMED approval.

The corrective action at the polychlorinated biphenyl- (PCB-) contaminated sites [Consolidated Unit 21-003-99 and Solid Waste Management Unit 21-024(c)] is regulated under the Toxic Substance Control Act; therefore, a separate work plan was submitted to the EPA Region 6 on March 31, 2009. An approval with modifications was received from the EPA on May 22, 2009. The modifications required verification sampling in accordance with the requirements of Subpart O, 761.280(b), with verification samples taken on a 1.5-m grid pattern rather than the 5-m grid pattern proposed in the NMED-approved work plan (EP2008-0646).

The schedule in the NMED-approved work plan assumed 80 preexcavation samples would be collected. However, the 80 samples collected indicated the limits of excavation had not been adequately defined to proceed with the corrective action, so an additional 55 preexcavation samples were collected. The limits of the excavation were adjusted based on a review of the additional sampling results. Collection of the 55 additional preexcavation samples and review of the results required 2 additional weeks to complete.

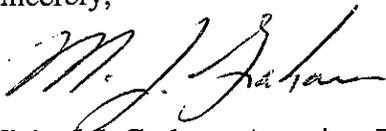
The schedule in the NMED-approved work plan assumed the collection of 45 verification samples on a 5-m grid pattern. The EPA-mandated verification sampling methodology was followed, and excavation continued until the 1 part per million (ppm) total PCB remediation goal was achieved. Based on the results of the verification sampling, the subcontractor performing the corrective action

was required to perform two phases of excavation at 22 areas and three phases of excavation at 5 areas to meet the 1 ppm total PCBs remediation goal. The EPA verification sampling requirement resulted in a total of 392 verification samples collected. The increased number of verification samples and additional excavation have taken an additional 6 weeks to complete.

The original schedule did not include any additional preexcavation samples, did not anticipate the 1.5-m grid pattern verification sampling requirement, and did not include time to conduct multiple rounds of excavation and verification sampling at numerous locations. Therefore, the Laboratory requests a 60-day extension to account for the additional corrective action work at the PCB-contaminated sites.

If you have any questions regarding this request, please contact Mark Thacker at (505) 699-1963 (mthacker@lanl.gov) or Woody Woodworth at (505) 665-5820 (lwoodworth@doeal.gov).

Sincerely,



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

Sincerely,



David R. Gregory, Project Director
Environmental Operations
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MG/DG/BC/MT:sm

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