Los Alamos
NATIONAL LABORATORY
EST. 1943
Environmental Programs
P.O. Box 1663, MS M991
Los Alamos, New Mexico 87545
(505) 606-2337/FAX (505) 665-1812

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: DEC 2 2 2009
Refer To: EP2009-0689

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 Extension of Time for Los Alamos Site Monitoring Area 2

Dear Mr. Bearzi:

The purpose of this letter is to notify the New Mexico Environment Department (NMED) of the completion of sediment removal from the upper drainage of Los Alamos Site Monitoring Area 2 (LA-SMA-2) and to request an extension to March 1, 2010, for removing additional media from the upper drainage and constructing the permanent retention basins. Los Alamos National Laboratory is requesting this extension because of changing weather and site conditions.

Removal of polychlorinated biphenyl- (PCB-) contaminated sediment from the upper LA-SMA-2 drainage was completed on December 20, 2009, to comply with the December 31, 2009, deadline given by NMED in its letter dated May 5, 2009. A total of 265 yd^3 of sediment was removed from the upper drainage, resulting in a significant reduction in the total contaminant inventory at the site.

As stated in the Laboratory's letter dated July 17, 2009, additional work will be conducted after December 31, 2009, to remove contaminated rock from the upper LA-SMA-2 drainage. In addition, the Laboratory has recently received field-screening data indicating the presence of PCBs above cleanup levels in soils from the banks of the upper drainage. The presence of PCBs exceeding cleanup levels in these soils above the current high-water mark was not anticipated and represents a major change in field conditions that will ultimately increase the scope of work to be completed. Although the PCBs are estimated to be lower in volume than they were in the contaminated drainage sediments, removing the PCB-contaminated rock and soil will take significant additional effort.

Efforts to remove contaminated material from the base of the drainage where the retention basins are to be built have been hampered by heavy snow and saturated conditions. In addition, large boulders have been encountered approximately 4 ft below the ground surface rather than the finer alluvial material overlying tuff bedrock that was expected based on exploratory hand-augering. These boulders are mixed with sediment and are below the level of saturation, further complicating removal. Despite difficult conditions, approximately 1200 yd^3 of sediment has been removed from this area, thereby reducing the PCB inventory in Upper Los Alamos Canyon. Confirmation

sampling results will be used to determine additional actions needed in this area before the permanent retention basins can be redesigned and constructed according to current knowledge of site conditions. Based on the level of saturation, it is anticipated that the excavated area will be partially backfilled, and the sides of the basins will extend above the current grade.

Given the changes in field conditions discussed above as well as increased scope associated with the bank soils in the upper drainage, constructing the retention basins and removing the contaminated media are not anticipated to be completed until March 1, 2010. The Laboratory therefore requests an extension from December 31, 2009, to March 1, 2010, to complete the field work at the site. The Completion Report for Sediment Removal and Sampling from LA-SMA-2 is still scheduled for delivery to NMED by May 1, 2010, in accordance with direction given in NMED's letter dated May 5, 2009. Please be assured that all existing erosion control measures will continue to be inspected and maintained during the final phases of this project.

Thank you for your consideration of this request. If you have any questions or wish to visit the site again, please contact Becky Coel-Roback at (505) 665-5011 (becky_cr@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (crodriguez2@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/BCR:sm

Cy: Laurie King, EPA Region 6, Dallas, TX
Tom Skibitski, NMED-OB, Santa Fe, NM
Steve Yanicak, NMED-DOE-OB, MS M894
Cheryl Rodriguez, DOE-LASO, MS A316
Annette Russell, DOE-LASO (date-stamped letter emailed)
Becky Coel-Roback, EP-CAP, MS M992
Dave McInroy, EP-CAP, MS M992
Michael J. Graham, ADEP, MS M991
Kristine Smeltz, EP-WES, MS M992
RPF, MS M707
IRM-RMMSO, MS A150 (date-stamped letter emailed)