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Date: APR 15 2010
Refer To: EP2010-0175

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 Deviation from the Approved Investigation Work Plan for Potrillo and Fence Canyons Aggregate Area, Revision 1

Dear Mr. Bearzi:

The purpose of this letter is to request New Mexico Environment Department (NMED) approval of a deviation from the approved Investigation Work Plan for Potrillo and Fence Canyons Aggregate Area, Revision 1 (hereafter, the work plan) for Solid Waste Management Unit (SWMU) 15-007(a).

SWMU 15-007(a) is an inactive landfill known as Material Disposal Area (MDA) N proposed for investigation and remediation in the work plan. Proposed investigation activities include performing surface radiological and geophysical surveys and excavating test pits and trenches. Proposed remediation activities include waste excavation and removal, confirmation sampling, backfilling, and site restoration.

While developing the work documents required to perform the remediation safely, Los Alamos National Laboratory (the Laboratory) discovered that insufficient data are available for this site because previous sampling efforts were performed at an incorrect location. Therefore, the Laboratory proposes to deviate from the approved work plan and will not implement the remediation activities for MDA N at this time. Instead, the Laboratory will perform an expanded investigation at the correct site location to collect the data needed to define the scope of remediation activities, identify the work hazards, and prepare the necessary safety documentation.

The investigation will consist of performing radiological, geodetic and geophysical surveys, sampling subsurface and surface soils, and excavating three test pits. The test pits will be excavated to characterize the types and depth of waste present and will be located based upon the results of the geophysical surveys. The proposed subsurface and surface sampling locations are shown on the attached figure. At the vertical borehole locations, samples will be collected from depths of 0–1.0 ft below ground surface (bgs), 4.0–5.0 ft bgs, 9.0–10.0 ft bgs, 14.0–15.0 ft bgs, and 19.0–20.0 ft bgs or 10 ft below the bottom of the trench, whichever is deeper. Angle boreholes will be drilled to collect samples from the interval that is 10 ft beneath MDA N. As specified in the work plan,

samples will be screened for radioactivity, volatile organic compounds (VOCs), and explosive compounds. Samples will be analyzed for isotopic uranium, isotopic thorium, cyanide, nitrate, perchlorate, VOCs, semivolatile organic compounds (SVOCs), explosive compounds, and metals.

The Laboratory will report the results of the investigation in the investigation report for the Potrillo and Fence Canyons Aggregate Area. The investigation report will also include any recommendation(s) for remediation at MDA N based on the results of the investigation. This deviation will not affect the date for submitting the investigation report.

If you have any questions, please contact John McCann at (505) 665-1091 (jmccann@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
Los Alamos Site Office

MG/DG/JM/SF:sm

Attachment: Proposed subsurface and surface sampling locations at Material Disposal Area N

Cy: (w/att.)
Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-DOE-OB, MS M894
Woody Woodworth, DOE-LASO, MS A316
John McCann, EP-CAP, MS M992
Kristine Smeltz, EP-WES, MS M992
RPF, MS M707

Cy: (w/o att.)
Tom Skibitski, NMED-OB, Santa Fe, NM
Annette Russell, DOE-LASO (date-stamped letter emailed)
Dave McInroy, EP-CAP, M992
Michael J. Graham, ADEP, MS M991
IRM-RMMSO, MS A150 (date-stamped letter emailed)