



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: MAY 03 2011
Refer To: EP2011-0179

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 the 2011 Interim Facility-Wide Groundwater Monitoring Plan

Dear Mr. Bearzi:

Los Alamos National Security and the U.S. Department of Energy (collectively, the Laboratory) request an extension of time of 59 days, from May 31, 2011, to July 29, 2011, to submit the 2011 Interim Facility-Wide Groundwater Monitoring Plan (IFGMP). The basis for the extension request is the time required to address modifications and comments included in the New Mexico Environmental Department's (NMED's) approval with modifications for the 2010 IFGMP, dated March 25, 2011. In its approval with modifications, NMED identified 19 modifications to be made to the ongoing implementation of the 2010 IFGMP and provided 23 comments to be incorporated into the 2011 IFGMP.

The principle comments requiring a substantial effort include

- reorganizing the document text and tables to address sampling and analyses requirements based on area-specific monitoring groups instead of the current watershed monitoring groups;
- developing a new methodology for determining the representativeness of groundwater samples for inclusion in the 2011 IFGMP that will replace the methodology presented in the Well Screen Analysis Report. The Laboratory proposes at least two meetings with NMED to be held within the requested extension period to develop the new methodology;
- developing a watch list of well screens for which representativeness of water quality is in question or has not yet been established; and
- lowering the practical quantitation limits (PQLs) for a list of 30 constituents for which screening limits are lower than current PQLs.

The Laboratory proposes to begin implementation of many of the modifications to the 2010 IFGMP that NMED has directed while the 2011 plan is being prepared under the proposed extended schedule. Specific items that will be implemented immediately include discontinuing sampling of Westbay screens that show residual effects of drilling fluids, implementing time-series sampling of

key indicator constituents during purging of select watch list wells, adding stable isotopes to specific analyte suites, and addressing the issues at the SCA-1 monitoring well location.

If you have any questions, please contact Steve Paris at (505) 606-0915 (smparis@lanl.gov) or Hai Shen at (505) 665-5046 (hshen@doeal.gov).

Sincerely,



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

Sincerely,



George Rael, Manager
Environmental Projects Office
Los Alamos Site Office

MG/GR/CD/SP:sm

Cy: Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-DOE-OB, MS M894
Tom Skibitski, NMED-OB, Santa Fe, NM (date-stamped letter emailed)
Hai Shen, DOE-LASO, MS A316 (date-stamped letter emailed)
Cheryl Rodriguez, DOE-LASO, MS A316 (date-stamped letter emailed)
Ed Worth, DOE-LASO, MS A316 (date-stamped letter emailed)
Annette Russell, DOE-LASO (date-stamped letter emailed)
Craig Douglass, EP-CAP, MS M992 (date-stamped letter emailed)
Steve Paris, EP-CAP, MS M992 (date-stamped letter emailed)
Michael J. Graham, ADEP, MS M991 (date-stamped letter emailed)
William Alexander, EP-BPS, MS M992 (date-stamped letter emailed)
RPF, MS M707 (electronic)