



Environmental Protection & Compliance Division
 P.O. Box 1663, MS K491
 Los Alamos, New Mexico 87545
 (505) 667-2211

National Nuclear Security Administration
Los Alamos Field Office
 3747 West Jemez Road, A316
 Los Alamos, New Mexico 87544
 (505) 667-5105/Fax (505) 667-5948

Date: OCT 23 2019
Symbol: EPC-DO: 19-387
LA-UR: 19-30332

Locates Action No.:

COPY

Mr. John Kieling, Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505

Subject: Request for Second Extension of Time Closure of Technical Area 16-399 Open Burn Unit, Los Alamos National Laboratory

Dear Mr. Kieling:

The purpose of this letter is to request a second extension of time to complete closure activities for the Technical Area (TA) 16-399 Burn Tray at the Los Alamos National Laboratory. The New Mexico Environment Department (NMED) issued the final closure plan on January 17, 2019. The U.S. Department of Energy (DOE) and Triad National Security, LLC (Triad) began closure activities associated with the unit on February 28, 2019 and requested an extension of time to complete those closure activities on August 8, 2019. The NMED approved the request on August 14, 2019.

Closure activities for the unit completed on September 26, 2019; however, it was determined that the closure performance standard was not achieved by the activities due to a single detection of an explosive compound RDX. Other detections of explosives in the area are measured to be beneath residential soil screening levels. The location of the detection that is above the screening levels is at the soil surface where the concrete pad was removed. A subsurface sample collected from the same location indicated the RDX concentration to be below residential soil screening levels at that depth. DOE and Triad request an extension of 90 days to continue closure activities to conduct the following:

- Remove the soil in the area where the sample was collected utilizing explosive field tests and an Explosives Safety Officer to guide soil removal extent. The soil will be disposed of as waste.
- Sample the new surface at the same location (Sample Location 11) and analyze for explosives. An additional four surface samples (one in each direction) will be collected from locations stepping away from the original sample location. Subsurface samples will also be collected from the four



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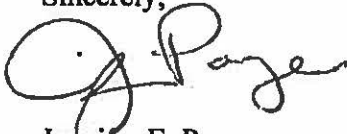
new locations. All sampling activities will be conducted in accordance with closure plan requirements.

- Revise the risk assessment, if appropriate, to remove the higher detection of RDX and include the analytical results for the additional samples.
- Complete the final certification report to include detailed information associated with soil removal, sampling, analysis, and the revised risk assessment.

The DOE and Triad hereby request a 90 day extension of time to complete closure activities at TA-16-399 Burn Tray. If this extension is approved, the new deadline for completing closure activities would be December 25, 2019 and a closure certification report would be delivered to the NMED on or before February 23, 2020.

Please contact Karen E. Armijo by telephone at (505) 665-7314 or by email at karen.armijo@nnsa.doe.gov, or Patrick L. Padilla (505) 667-3932 or by email at plpadilla@lanl.gov if you have questions regarding this request or would like further discussion.

Sincerely,



Jennifer E. Payne
Division Leader (Acting)
Environmental Protection & Compliance
Triad National Security, LLC
Los Alamos National Laboratory

Sincerely,



Karen E. Armijo
Permitting and Compliance Program Manager
National Nuclear Security Administration
Los Alamos Field Office
U.S. Department of Energy

ET/KEA/PLP:xxx

Enclosures (s):

Copy: Laurie King, EPA, king.laurie@epa.gov
Neelam Dhawan, NMED-HWB, neelam.dhawan@state.nm.us
Siona Briley, NMED-HWB, siona.briley@state.nm.us
Gabriel M. Pugh, NA-LA, gabriel.pugh@nnsa.doe.gov
Peter Maggiore, NA-LA, peter.maggiore@nnsa.doe.gov
Jody M. Pugh, NA-LA, jody.pugh@nnsa.doe.gov
Adrienne Nash, NA-LA, adrienne.nash@nnsa.doe.gov
Karen E. Armijo, NA-LA, karen.armijo@nnsa.doe.gov
Michael W. Hazen, ALDESHQSS, mhazen@lanl.gov
William R. Mairson, ALDESHQSS, wrmairson@lanl.gov
Enrique Torres, EWP, etorres@lanl.gov
Jennifer E. Payne, EPC-DO, jpayne@lanl.gov
Peter H. Carson, EPC-WMP, pcarson@lanl.gov
Patrick L. Padilla, EPC-WMP, plpadilla@lanl.gov
Darlene T. Trujillo, EPC-WMP, darlenet@lanl.gov
adesh-records@lanl.gov

Mr. John Kieling
EPC-DO: 19-387

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locatsteam@lanl.gov
epccorrespondence@lanl.gov
rcra-prr@lanl.gov