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

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NMED Hazardous
Waste Bureau

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: December 12, 2008
Refer To: EP2008-0625

James P. Bearzi, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Submittal of Request for Approval of Areas of Contamination for the Investigation and Remediation of Solid Waste Management Units 39-001(a), 39-001(b), and 39-006(a) at Technical Area 39

Dear Mr. Bearzi:

The purpose of this letter is to request approval for three area of contamination designations for the investigation and remediation of Solid Waste Management Units (SWMUs) 39-001(a), 39-001(b), and 39-006(a). These SWMUs are located in Technical Area 39 (TA-39) but are not contiguous; therefore, an area of contamination designation is being requested for each SWMU. These SWMUs are being investigated and remediated according to the approved revised investigation work plan for the North Ancho Aggregate Area, dated December 2007 (EP2007-0761). Los Alamos National Laboratory (the Laboratory) proposes the boundaries of the area of contamination include the sites shown on the site maps (Attachment 1). The Laboratory is requesting that the area of contamination determinations be effective through the completion of the investigation and remediation activities at the site.

The primary purpose of requesting the area of contamination for each SWMU is to facilitate on-site staging and segregation of approximately 8600 yd^3 of remediation waste and additional layback and overburden spoils without triggering a new point of generation or a new area of placement of waste subject to Resource Conservation and Recovery Act requirements. Designating these areas of contamination will provide the Laboratory with flexibility for compliant on-site management of waste while making final waste determinations and for managing the materials that will be staged until they are returned to their respective excavations.

Excavated overburden and layback environmental media will be sampled and analyzed as needed for volatile organic compounds, semivolatile organic compounds, target analyte list metals, cyanide, nitrates, high explosives (if screening detects their presence), perchlorates, radionuclides, polychlorinated biphenyls, and toxicity characteristic metals. The analytical results will be used to ensure that only environmental media with contaminant concentrations that are less than background or industrial cleanup levels will be returned to the point of origin.

All staging and segregation of waste and environmental media on-site will be conducted in an environmentally protective manner, using a combination of containers and appropriately designed and controlled (e.g., bermed, covered) staging piles. Materials will be containerized and managed in accordance with regulatory requirements upon transfer outside of the area of contamination boundary. All deviations from Appendix B of the approved investigation work plan for the North Ancho Canyon Aggregate Area, and all newly developed waste management strategies for this project will be documented in the investigation report for this aggregate area.

If you have any questions, please contact John McCann at (505) 665-1091 (jmccann@lanl.gov) or Suzy Schulman at (505) 606-1962 (sschulman@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/JM/AS:sm

Attachment: Site maps designating areas of contamination (LA-UR-08-7860)

Cy: (w/att.)
Laurie King, EPA Region 6, Dallas, TX
Ken Kisiel, Portage, Los Alamos, NM
Steve Yanicak, NMED-OB, White Rock, NM
Katie Roberts, NMED-HWB, Santa Fe, NM
John McCann, EP-CAP, MS M992
Ann Sherrard, ENV-RCRA, MS K490
Suzy Schulman, DOE-LASO, MS A316
Kristine Smeltz, WES-DO, MS M992
EP-CAP File, MS M992
RPF, MS M707

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