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FEB 2009
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: February 6, 2009
Refer To: EP2009-0047

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 the Request for Approval of an Area of Contamination for the Investigation and Remediation of Solid Waste Management Units 21-003-99 and 21-024(c) at Technical Area 21

Dear Mr. Bearzi:

The purpose of this letter is to request approval for an area of contamination designation for the investigation and remediation of Consolidated Unit 21-003-99 and Solid Waste Management Unit (SWMU) 21-024(c). These sites are located in the same geographic area, and remediation is required to achieve the cleanup of polychlorinated biphenyls and other contaminants. Los Alamos National Laboratory (the Laboratory) proposes that the area of contamination boundary be designated to include the area shown on the site map (Figure 1). The Laboratory is requesting that the area of contamination determination be effective through the completion of the investigation and remediation activities at the site scheduled for September 2009.

The primary purpose of requesting the area of contamination is to facilitate the staging and segregation of remediation waste on-site (i.e., within the area of contamination boundary) without triggering a new point of generation or placement of waste subject to Resource Conservation and Recovery Act requirements. The Laboratory is not requesting to use the area of contamination concept to return media to their point of origin. The attached "Management Plan for Investigation-Derived Waste" (Attachment 1) describes how waste will be managed within the area of contamination and the management of other waste generated during Phase II of the Delta Prime Site Aggregate Area investigation.

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 and covered) staging piles. Materials determined to be hazardous waste will be containerized and managed in full accordance with regulatory requirements upon transfer outside of the area of contamination boundary.

The Laboratory believes that designation of an area of contamination is needed to provide flexibility for on-site management of waste while final waste determinations are made. This letter is intended

to provide sufficient documentation to justify an area of contamination designation for the site investigation and remediation of Consolidated Unit 21-003-99 and SWMU 21-024(c).

If you have any questions, please contact Mark Thacker at (505) 665-5342 (mthacker@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/AC/MT:sm

Enclosures: (1) Figure 1: Site map (LA-UR-09-0643)
(2) Attachment 1: Management Plan for Investigation-Derived Waste for Phase II of the Delta Prime Site Aggregate Area (LA-UR-09-0643)

Cy: (w/enc.)
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Katie Roberts, NMED-HWB, Santa Fe, NM
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