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JUL 2010
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: JUL 23 2010
Refer To: EP2010-0348

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 Approval for Designation of an Area of Contamination for Technical Area 21 Closure Project

Dear Mr. Bearzi:

Los Alamos National Laboratory (the Laboratory) requests New Mexico Environment Department (NMED) approve the designation of an area of contamination (AOC) boundary at Technical Area 21 (TA-21) to be effective during the completion of remediation activities being performed at TA-21 under the Compliance Order on Consent (the Consent Order).

The proposed AOC is needed to effectively manage generated wastes for the following reasons.

- It provides a larger staging area for waste storage and shipping.
- It allows for consolidation and sharing of resources among remediation and decontamination and decommissioning projects, including waste management areas, support facilities, equipment, and personnel.
- The American Recovery and Reinvestment Act (ARRA) TA-21 Closure Project is managed as a contiguous area.
- The acceleration of the Material Disposal Area (MDA) B investigation/remediation will generate significantly more waste containers than can be stored within the current AOC.
- The remediation of MDA A is expected to encounter a similar issue if the AOC is limited to the MDA boundary.
- It will consolidate required stormwater best management practice controls.
- It will promote safer work conditions for site workers, the environment, and the public.

The Laboratory is not requesting to use the AOC concept to return media to their places of origin, except where prior authorization has been obtained in an NMED-approved work plan (e.g., appropriately characterized overburden/layback material).

The proposed AOC boundary is shown on the attached site map that included specific waste storage site locations. The proposed waste storage areas are numbered for ease of reference. Several areas

will not be available for storage until demolition activities are complete (e.g., Storage Areas 3, 4, 5, and 6). The Laboratory has applied to the U.S. Department of Energy (DOE) to take MDA A, with the exception of the General's Tanks, out of the safety basis. Once DOE approval is obtained, Storage Area 9 will be available.

All staging and segregation of waste and environmental media within the AOC boundary will be conducted in an environmentally protective manner using a combination of appropriate containers. Whenever possible, waste will be stored in areas scheduled for future characterization and/or remediation. If waste containers are placed in remediated areas, the storage area will be prepared as necessary to ensure the areas can be inspected following removal of the storage containers. Once these areas are no longer used, the inspection records for each specific waste storage site location will be reviewed and the pad inspected to ensure no wastes were released.

Materials determined to be hazardous waste will be containerized and managed in accordance with Resource Conservation and Recovery Act regulatory requirements once they are transferred outside the AOC boundary. It should be noted that all waste generated under ARRA will be disposed of off-site before September 30, 2011.

Thank you for your consideration of this request. We welcome the opportunity to meet with you to discuss this proposal and answer any questions you may have. If you have any questions, please contact Bruce Schappell at (505) 665-4897 (schapp@lanl.gov) or Everett Trollinger at (505) 667-0281 (etrollinger@doeal.gov).

Sincerely,

Bruce Schappell, Executive Director
Environmental Programs – Recovery Act Projects
Los Alamos National Laboratory

Sincerely,

Everett Trollinger, Federal Project Director
Environmental Projects – ARRA
Los Alamos Site Office

BS/ET/GD/LN:sm

Attachment: TA-21 Proposed AOC Boundary and WCSA Storage Areas (LA-UR-10-5004)

Cy: Laurie King, EPA Region 6, Dallas, TX
Tom Skibitski, NMED-OB, Santa Fe, NM
Steve Yanicak, NMED-DOE-OB, MS M894
Annette Russell, DOE-LASO (date-stamped letter emailed)
Everett Trollinger, DOE-LASO, MS A316
Gordon Dover, EP-TA-21, MS C348
Michael J. Graham, ADEP, MS M991
Kristine Smeltz, EP-BPS, MS M992
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