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NMED
Hazardous Waste Bureau

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Date: MAR 14 2014
Refer To: EP2014-0094

John Kieling, 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 to Deploy Tracers at Consolidated Unit 16-021(c)-99

Dear Mr. Kieling:

This letter requests an extension from the March 31, 2014, date to deploy tracers at Consolidated Unit 16-021(c)-99 [including R-25b and CdV-16-1(i)] to a new date of December 31, 2014. The U.S. Department of Energy and Los Alamos National Security, LLC, (DOE/LANS) request this extension under Section III.J.2 of the March 2005 Compliance Order on Consent.

As stated in the Work Plan for a Tracer Test at Consolidated Unit 16-021(c)-99 (also referred to as the Technical Area 16 [TA-16] 260 Outfall project), the tracer test is being conducted to support a future assessment of potential remedial alternatives for contaminated groundwater associated with the 260 Outfall by better understanding the local hydrogeological conditions in the area of contaminated perched-intermediate groundwater. The tracer work plan proposed meeting this objective by improving the understanding of (1) local hydrogeological gradients and groundwater velocities/fluxes and (2) lateral and vertical contaminant travel times. The objective of collecting data to support an assessment of potential remedial alternatives will be more effectively addressed with the results of the following field activities.

Per discussions with NMED management and staff on February 20 and 24, 2014, Los Alamos National Laboratory (the Laboratory) will drill two additional groundwater monitoring wells in 2014 as part of the TA-16 260 Outfall project. One of the new wells, CdV-9-1(i), will be instrumental in furthering the understanding of the extent of perched-intermediate groundwater north of Cañon de Valle (see attached Figure 1). Additionally, the Laboratory will be conducting an RDX (hexahydro-1,3,5-trinitro-1,3,5-triazine) source-removal pilot study at CdV-16-4ip under an approved interim measures work plan, expected to begin in late spring or early summer 2014.

The current interim measures work is oriented towards evaluating a mass-removal strategy for RDX in the perched-intermediate zone. Therefore, it is anticipated the results of the interim measures pumping at CdV-16-4ip and aquifer testing at CdV-9-1(i) will increase the understanding of the hydraulics of the perched-intermediate zone in a manner potentially more useful for guiding mass-removal strategies for the perched zone than would be provided by the tracer study.

Per discussions with NMED, DOE/LANS are requesting an extension only until December 31, 2014. However, DOE/LANS anticipate that before December 31, 2014, an additional extension request will be submitted with a revised date based on NMED priorities, funding constraints, and adequate time to complete the work. This additional time may also allow DOE/LANS to obtain sufficient data from the new wells to evaluate whether a tracer study is still deemed useful for guiding potential remediation strategies. If a tracer study is appropriate, this additional extension would provide time for data from the new wells and interim measures pumping to guide tracer deployment activities. If tracer activities are implemented, appropriate permits would be in place for the work.

If you have any questions, please contact John McCann at (505) 665-1091 (jmccann@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (cheryl.rodriguez@nnsa.doe.gov).

Sincerely,

Jeff Mousseau, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,

Peter Maggiore, Assistant Manager
Environmental Projects Office
Los Alamos Field Office

JM/PM/DM/JM:sm

Cy: Laurie King, EPA Region 6, Dallas, TX (date-stamped letter emailed)
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Katie Roberts, EP-REG (date-stamped letter emailed)
Tori George, EP-REG (date-stamped letter emailed)
Kent Rich, EP-CAP (date-stamped letter emailed)
John McCann, EP-CAP (date-stamped letter emailed)
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Dan Cox, ADEP (date-stamped letter emailed)
Jeff Mousseau, ADEP (date-stamped letter emailed)
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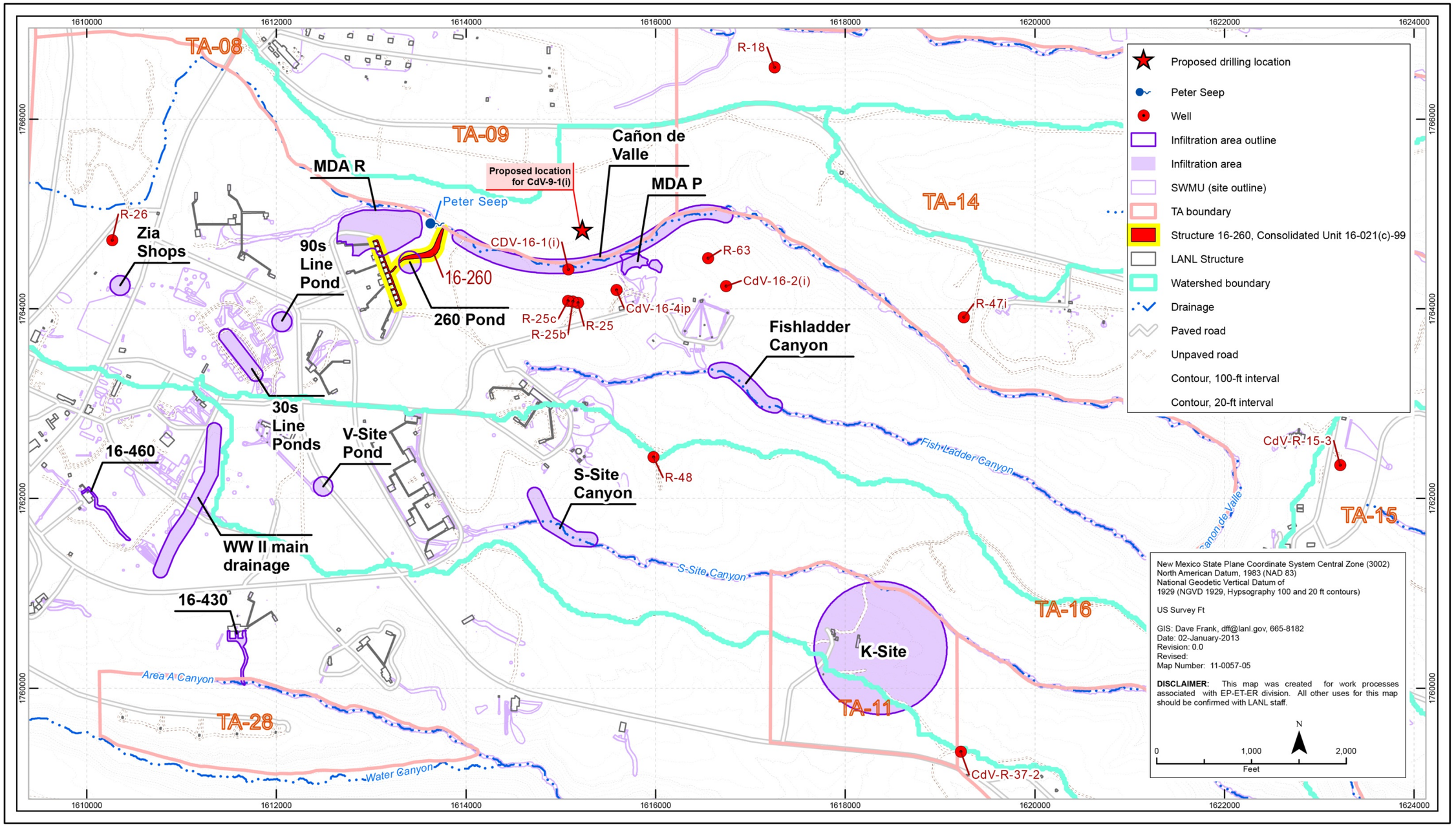

Figure 1 **Proposed location of well CdV-9-1(i)**