September 26, 2018

Doug Hintze, Manager
Environmental Management
Los Alamos Field Office
P.O. Box 1663 MS-M984
Los Alamos, NM 87545

RE: Approval
Request for Extension of Phase 2 Pilot Amendments Testing Work Plan
Fiscal Year 2018 Milestone #10
Los Alamos National Laboratory
EPA ID NM0890010515
HWB-LANL-MISC-GW

Dear Mr. Hintze:

The New Mexico Environment Department ("NMED") has received from the United States Department of Energy’s ("DOE") document entitled Request for Extension of Phase 2 Pilot Amendments Testing Work Plan ("Request"), dated September 20, 2018 and referenced by EM-LA-20AD-00310. The Request was received on September 20, 2018.

DOE has requested an extension for the Phase 2 Pilot Amendments Testing Work Plan (Phase 2 work plan), listed as Milestone #10 in the Fiscal Year ("FY") 2018 version of Appendix B, Milestones and Targets, in the 2016 Compliance Order on Consent ("Consent Order"). The Phase 2 work plan will be based on results from the Phase 1 pilot-scale amendments test ("Phase 1 test"), which has not yet been completed. DOE is requesting an extension to submit the Phase 2 work plan because the Phase 1 test results are necessary to inform the Phase 2 work plan. The extension will also enable the completion of a cross-hole tracer study between CrPZ-1 and CrEX-2 to support the Phase 2 amendments testing.
Section XXVIII, Extensions, of the Consent Order allows for milestone extensions when good cause exists, such as the collection of new technical information. DOE has demonstrated that a good cause exists for the requested extension. NMED hereby grants the extension for submittal of FY 2018 Milestone #10 in accordance with Section XXVIII of the Consent Order. Additionally, in accordance with Section XXXV.A.3 of the Consent Order, Milestone #10 is no longer a milestone for FY 2018. As proposed in the Request, DOE must submit the Phase 2 work plan by June 28, 2019. DOE and NMED have agreed that the milestone shall be incorporated into the updated FY 2019 Appendix B pursuant to the process set forth in Section VIII.C.

Additionally, DOE shall submit a work plan for the cross-hole tracer study between CrPZ-1 and CrEX-2 by October 31, 2018, as stated in the Request.

If you have any questions or comments regarding this correspondence, please contact Dane Andersen at 505-476-6056.

Sincerely,

John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB  
   D. Andersen, NMED HWB  
   M. Dale, NMED HWB  
   S. Yanicak, NMED DOE OB, MS M894  
   L. King, EPA Region 6, Dallas, TX  
   D. Rhodes, DOE-EM-LA  
   D. Nickless, DOE-EM-LA  
   A. Duran, DOE-EM-LA  
   C. Rodriguez, DOE-EM-LA  
   H. Shen, DOE-EM-LA  
   N. Lombardo, N3B  
   F. Lockhart, N3B  
   J. Legare, N3B  
   B. Robinson, N3B  
   D. Katzman N3B  
   S. White, N3B  
   R. Martinez, San Ildefonso Pueblo  
   D. Chavarria, Santa Clara Pueblo  
locatesteam@lanl.gov  
emla.docs@em.doe.gov
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