

Steven Paris

From: David J McInroy [mcinroy@lanl.gov]
Sent: Thursday, May 22, 2008 1:33 PM
To: Cobrain, Dave, NMENV; Steven Paris
Cc: Worth, Edwin; Bearzi, James, NMENV
Subject: RE: Clarification NMED Letter Re: MDA L Subsurface V-M Plan Approval w/ Mods

Thanks Dave, We'll proceed.
 Have a great holiday weekend!
 Dave

At 10:23 AM 5/22/2008, Cobrain, Dave, NMENV wrote:

>Dave,

>

>You are correct. Samples should be collected at the locations of the
 >highest concentration in each stratigraphic unit. The sample ports
 >that most closely correspond to the base of disposal units are likely
 >the ports with the highest detected contaminant concentrations in that
 >stratigraphic unit.

>

>Dave

>

>Main HWB Phone: 505-476-6000
 >Direct Office Phone: 505-476-6055
 >Fax: 505-476-6030 or 505-476-6060

>

>-----Original Message-----

>From: David J McInroy [mailto:mcinroy@lanl.gov]
 >Sent: Thursday, May 22, 2008 9:02 AM
 >To: Cobrain, Dave, NMENV; Roberts, Kathryn, NMENV; Steven Paris
 >Cc: Worth, Edwin; Bearzi, James, NMENV
 >Subject: RE: Clarification NMED Letter Re: MDA L Subsurface V-M Plan
 >Approval w/ Mods

>

>Dave,

>Not trying to beat a dead horse. The issue that is yet unresolved is
 >within your Sept 25, 2007 NOD, which states within specific comment #
 >1 "samples will be collected from the port that most closely
 >corresponds to the base of the disposal unit (pit or
 >shaft) OR the area which historically has had the highest hit
 >of contamination". Is this our discretion to pick which port depth we
 >want to monitor or is one port depth more important than the other to
 >the state (what if base of disposal unit is not the highest
 >concentration?) The table which Steve generated and sent for your
 >review defaulted to the location of highest concentration. Is this the
 >right logic?

>Dave

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>At 03:28 PM 5/20/2008, Cobrain, Dave, NMENV wrote:

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> >Dave,

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> >To clarify my earlier email, which probably added to the confusion,
 > >the highlighted portions of the attached letters should make our
 > >position clear with regard to vapor monitoring at MDA L. We also
 > >agree with the proposal to monitor percent oxygen and CO2 at each
 > >location. The wells are listed in the November 8th letter. Hope
 > >this clears up the confusion.

> >

> >Dave

> >

31271



> >
> >Main HWB Phone: 505-476-6000
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> >
> >
> >-----Original Message-----
> >>From: David J McInroy [mailto:mcinroy@lanl.gov]
> >>Sent: Friday, May 16, 2008 12:07 PM
> >>To: Roberts, Kathryn, NMENV; Steven Paris
> >>Cc: Worth, Edwin; Cobrain, Dave, NMENV
> >>Subject: RE: NMED Letter Re: MDA L Subsurface V-M Plan Approval w/
> >Mods
> >
> >Katie,
> >>I asked Steve to re-confirm the state's expectations of what was
> >>intended to be reported in the monitoring report. The contractor
> >>executing the plan expressed confusion and Steve echoed the same. Is
> >>it possible to review Steve's attempt to crosswalk the requirements
> >>and put a table. We would like to find out prior to the sampling and
> >>reporting, if we are interpreting your direction accurately. Hai
> >>Shen is doing the same for us at MDA G. You've got to believe that
> >>if we're confused, an independent (public) reviewer of our documents
> >>would be as well.
> >>Thanks, just trying to fix on front end.
> >>Dave
> >>
> >> attached table to the requirements At 08:35 AM 5/16/2008, Roberts,
> >>Kathryn, NMENV wrote:
> >>>Steve,
> >>>
> >>>NMED appreciates the Permittees attempt to eliminate confusion
> >>>regarding sampling locations and depths for the MDA L Interim
> >>>Subsurface Vapor Monitoring Plan (Plan). However, NMED identified
> >>>the locations to be monitored in its November 8, 2007 approval with
> >>>modifications. Additionally, the September 25, 2007 NOD states,
> >>>
> >>>
> >>>"The Permittees must obtain a pore-gas sample from one port in each
> >>>geologic unit at each vapor monitoring location. If there are two
> >>>ports in the same geologic unit in an individual borehole, the
> >>>Permittees must sample the port that most closely corresponds to
> >>>the base of a disposal unit (pit or shaft) or that historically has
> >>>the highest detects of contamination. All samples must be analyzed
> >>>for VOCs and tritium."
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> >>>
> >>>Any deviations from the approved Plan must be documented in the
> >>>Interim Subsurface Vapor Monitoring Report.
> >>>
> >>>
> >>>Please let me know if you have any questions.
> >>>
> >>>
> >>>Katie
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> >>>
> >>>-----
> >>>>From: Steven Paris [mailto:smparis@lanl.gov]
> >>>>Sent: Wednesday, May 14, 2008 1:46 PM
> >>>>To: Roberts, Kathryn, NMENV
> >>>>Cc: 'David J McInroy'; 'Worth, Edwin'
> >>>>Subject: FW: NMED Letter Re: MDA L Subsurface V-M Plan Approval w/
> >>>>Mods

> > >Importance: High
> > >
> > >Katie,
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> > >
> > >Because of the confusing nature of Table 3.0-1 in the Interim
> > >Subsurface Vapor-Monitoring Plan for Material Disposal Area L at
> > >Technical Area 54, Revision 1 conflicting with approval of
> > >modifications, I would like to provide you a summary table
> > >definitively identifying all sample locations for your review.
> > >This is being done to ensure that we are in agreement as to what
> > >locations are to be monitored and sampled and NMED gets what they
> > >are expecting.
> > >
> > >The attached table includes the 25 sample locations identified in
> > >the November 8, 2007 approval with modifications and port depths to
> > >be sampled for VOCs and tritium based on the requirements
> > >identified in the September 25, 2007 Notice of Disapproval. The
> > >requirements in the NOD are provided below:
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> > >[]
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> > >LANL identified the port that historically presented the highest
> > >detects of contamination to sample in the attached table.
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> > >We intend to implement the 3rd quarterly pore-gas sampling
> > >according to attached table following your approval. Please note
> > >this table replaces the table provided in the April 30, 2008,
> > >15-day sampling notification letter.
> > >
> > >Please provide your concurrence or comments to me in the near future.
> > >
> > >Thanks,
> > >
> > >Steve
> > >
> > >
> > >Steve Paris
> > >
> > >Corrective Actions Projects
> > >
> > >Los Alamos National Laboratory
> > >
> > >P.O. Box 1663, Mail Stop: M992
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> > >Los Alamos, NM 87544
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> > >505-606-0915 (o) 505-670-9116 (c)
> > >
> > ><mailto:smparis@lanl.gov>smparis@lanl.gov
> > >
> > >-----
> > >>From: Roberts, Kathryn, NMENV [mailto:Kathryn.Roberts@state.nm.us]
> > >>Sent: Monday, March 03, 2008 12:40 PM
> > >>To: Steven Paris
> > >>Cc: Worth, Edwin; David J McInroy; Cobrain, Dave, NMENV
> > >>Subject: RE: NMED Letter Re: MDA L Subsurface V-M Plan Approval w/
> > >>Mods
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> > >>Steve,

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> > >The November 8, 2007 Approval with Modifications for the MDA L
> > >Interim Vapor-Monitoring Plan (Plan) identifies the locations to be
> > >sampld on a quarterly basis (the 25 locations listed in Comment #
> > >3). NMED referenced the September 25, 2007 Notice of Disapproval
> > >(NOD) concerning sampling intervals which discussed the 25
> > >locations listed in the November 8, 2007 Approval with Modifications.
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> > >The Approval with Modifications is an enforceable document under
> > >the March 1, 2005 Order on Consent (Order). A revised Plan was not
> > >requested because the Approved Plan as Modified by the November 8th
> > >letter provides the requirements for subsurface vapor monitoring at
>MDA L.
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> > >Please call if you are unclear as to the requirements of the work
> > >plan or approval with modifications.
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> > >
> > >
> > >Katie
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> > >
> > >-----
> > >From: Steven Paris [mailto:smparis@lanl.gov]
> > >Sent: Monday, March 03, 2008 10:58 AM
> > >To: Roberts, Kathryn, NMENV
> > >Cc: 'Worth, Edwin'; 'David J McInroy'
> > >Subject: NMED Letter Re: MDA L Subsurface V-M Plan Approval w/ Mods
> > >
> > >Katie,
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> > >In the September 25, 2007 Notice of Disapproval of the Interim
> > >Subsurface Vapor-Monitoring Plan for MDA L, NMED states that LANL
> > >will collect a pore-gas sample from one port in each geologic unit
> > >at each vapor monitoring location. If there are two ports in the
> > >same geologic unit in an individual borehole we will sample the
> > >port that most closely corresponds to the base of the disposal unit
> > >or that historically has the highest detects of contamination.
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> > >In their November 8, 2007 Approval with Modification for the
> > >Interim Subsurface Vapor-Monitoring Plan for MDA L Rev_1, NMED
> > >identifies an list of locations that are to be sampled and
> > >references the September 25, 2007 correspondence to identify port
> > >depths to be sampled. I interpreted NMEDs Comment 3 of the
> > >attached approval with modifications to be inclusive of all MDA L
> > >vapor monitoring
>locations.
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> > >I'd like to revise Table 3.0-1, MDA L Pore-Gas Monitoring Locations
> > >of Rev_1 of the plan to address the NOD and approval with
> > >modifications requirements. Revision 2 of the plan will include
> > >all sample locations identified in the November 8, 2007
> > >correspondence and port depths as defined in the September 25, 2007 NOD.
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> > >Please provide your concurrence that another revision of the
> > >vapor-monitoring plan is required to capture and present the MDA L
> > >vapor-monitoring sampling scope in a single document.

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> > >Thanks,

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> > >
> > >
> > >Steve

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> > >
> > >Steve Paris

> > >
> > >Corrective Actions Projects
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> > >P.O. Box 1663, Mail Stop: M992
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> > >505-606-0915 (o) 505-670-9116 (c)
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> > ><mailto:smparis@lanl.gov>smparis@lanl.gov

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