State of New Mexico
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TA-21

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 26, 2005

David Gregory, Federal Project Director
Los Alamos Site Office
Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, NM 87544

G. Pete Nanos, Director
Los Alamos National Laboratory
P.O. Box 1663, Mail Stop A100
Los Alamos, NM 87545

RE: APPROVAL WITH MODIFICATIONS
INVESTIGATION WORK PLAN FOR MATERIAL DISPOSAL AREA A AT TECHNICAL AREA 21
EPA ID #NM0890010515
HWB-LANL-05-002

Dear Messrs. Gregory and Nanos:

The New Mexico Environment Department (NMED) has reviewed the *Response to the Notice of Disapproval for Investigation Work Plan for Material Disposal Area A, at Technical Area 21,* referenced by LA-UR-05-4760, ER2005-0415 and dated June 2005. NMED hereby approves the work plan with the modifications described in this letter.

The Permittees must document in the Investigation Report for MDA A all activities conducted pursuant to this approval, including the modifications outlined in this letter. Noncompliance with the modifications outlined in the approval letter may result in automatic recission of the work plan approval and potentially subject the Permittees to an enforcement action. Furthermore, the Permittees shall not respond to comments in an approval with modifications unless NMED specifically requires a response or a resubmittal, in which case the response or resubmittal must be limited to only those required by NMED.

10854

Note: Comment numbers refer to the original NOD dated June 1, 2005

Specific Comments:

7. NMED is allowing the use of pore-gas analysis for volatile organic compounds (VOCs) in lieu of analyzing the core samples collected from 25 feet below the base of a disposal unit or tank to the bottom of the borehole. However, if the Permittees encounter contamination in soil/tuff from the surface to 25 feet below the base of a disposal unit or a tank, then the Permittees shall collect soil and tuff samples for laboratory analysis of VOCs in addition to the pore-gas samples.

The proposed high explosive (HE) analysis of the upper 20% of the highest detections of samples will not determine the extent of contamination. The Permittees shall not use this method as an alternative to Order requirements. The Permittees must follow Section IV.C.2.c.iv of the Order, which states a minimum of four samples shall be selected from each boring for submittal to a laboratory for analysis of VOCs, semi-volatile organic compounds (SVOCs), explosive compounds, pH, PCBs, dioxins, furans, nitrates, perchlorate, TAL metals, and cyanide. These samples shall consist of the sample exhibiting the highest field screening detection; the sample obtained from the maximum depth in each boring that displays field screening evidence of contamination; the sample located immediately below the base of any pit, tank or other structure; and the sample from the total boring depth. The only exception to this requirement is borehole 12, for which detailed sampling locations have been provided and that follow the requirements outlined in the Order.

10. In addition to advancing boreholes to 25 ft below the deepest detected contamination based on field screening, the borings must be advanced at least 20 ft below the base of disposal units if contamination is not detected, in accordance with Section IX.B.2.b.i of the Consent Order.

Should you have any questions, please contact Laurie Trevizo at (505) 428-2539.

Sincerely,

James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:lt

cc: L. Trevizo, NMED HWB
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file: Reading and LANL TA-21 [21-014, Generals Tanks]