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JON GOLDSTEIN
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 30, 2008

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

David McInroy
Remediation Services Deputy Project Director
Los Alamos National Laboratory
P.O. Box 1663, MS M992
Los Alamos, NM 87545

**RE: NOTICE OF DISAPPROVAL
TECHNICAL AREA 21 SUBSURFACE VAPOR MOISTURE
MONITORING PLAN FOR TRITIUM, JULY 2008
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-08-019**

Dear Messrs. Gregory and McInroy:

The New Mexico Environment Department (NMED) has received the Los Alamos National Laboratory's L.L.C.'s (LANS) (collectively, the Permittees) *Technical Area 21 Subsurface Vapor Moisture Monitoring Plan for Tritium* (Plan), dated July 2008 and referenced by LA-UR-08-3818/EP2008-0397. The NMED has reviewed the Plan and hereby issues this Notice of Disapproval (NOD).

Specific Comments:

1. Section 1.0, Introduction, Page 1, Paragraph 1:

Permittees' Statement: "Currently, potential sources of tritium include the Tritium Systems Test Assembly (TSTA) building and other associated buildings at Delta Prime (DP) East, the laundry facility and absorption beds at Material Disposal Area (MDA) V, MDA T absorption



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beds, and building 21-257 wastewater treatment plant. The nearest potential for tritium from an off-site source is the Omega West Reactor located west of MDA B and in the bottom of Los Alamos Canyon.”

NMED Comment: The introduction discusses potential sources of tritium contamination and goes on to explain that a borehole directly under the TSTA may be warranted; planning for this activity is premature. The introduction did not mention historical tritium investigations performed at MDA A and MDA B. Additionally, tritium was detected in six of seven boreholes at MDA B and was detected in tuff below MDA A indicating significant tritium releases at those two sites. The Permittees must revise the Plan to propose additional vapor-monitoring wells at MDAs A and B.

Demolition and decontamination (D & D) of the TSTA and other structures at TA-21, and further investigation and remediation activities at TA-21, may make additional vapor-monitoring wells necessary. NMED will determine whether or not additional vapor-monitoring wells are required following review of the Final TA-21 Tritium Vapor-Monitoring Report. The results from current and previous sampling events as well as any discussion required to qualify the results must be presented in the Final TA-21 Tritium Vapor-Monitoring Report, due to NMED 45 days following the last day of the fourth quarter sampling event.

2. Figure B-3.0-1, Vapor-monitoring well location, page B-7:

NMED Comment: The map indicates the location of the proposed vapor-monitoring well, 21-25262, and three existing vapor-monitoring wells; 21-603058, 21-25264, and 21-603059. However, there is no discussion about continued vapor monitoring from the three existing vapor-monitoring wells. The Permittees must revise the Plan to include the three existing vapor-monitoring wells to be monitored in addition to the proposed vapor-monitoring well 21-25262.

The Permittees must address all comments and submit a revised Plan by January 16, 2009. All submittals (including maps) must be in the form of two paper copies and one electronic copy in accordance with Section XI.A of the Order. In addition, the Permittees shall submit a redline-strikeout version that includes all changes and edits to the Plan (electronic copy) with the response to this NOD.

Messrs. Gregory and McInroy
December 30, 2008
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Please contact Kathryn Roberts at (505) 476-6041 should you have any questions.

Sincerely,



James P. Bearzi

Chief

Hazardous Waste Bureau

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File: Reading and LANL 2008 TA-21