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NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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May 4, 2009

David Gregory
Federal Project Director
Los Alamos Site Office
Department of Energy
3747 West Jemez Road, 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: APPROVAL WITH MODIFICATIONS
SAMPLING AND ANALYSIS PLAN FOR DIRECT-PUSH TECHNOLOGY AT MATERIAL DISPOSAL AREA B,
LOS ALAMOS NATIONAL LABORATORY,
EPA ID #NM0890010515
HWB-LANL-09-013

Messrs. Gregory and McInroy:

The New Mexico Environment Department (NMED) is in receipt of the Department of Energy (DOE) and the Los Alamos National Security, L.L.C.'s (LANS) (collectively, the Permittees) *Sampling and Analysis Plan for Direct-Push Technology at Material Disposal Area B* (Plan), referenced by LA-UR-09-2338/EP2009-0198 and dated April 2009. NMED has reviewed the Plan and hereby issues this approval with the following modifications.

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General Comments:

1. **NMED Comment:** NMED believes it unlikely that Direct-Push Technology (DPT) will accomplish the objectives described in the Plan. Most likely, the DPT will all-too-often encounter refusal because the 2-inch plastic liners cannot be driven through solid items such as metal equipment, drums, concrete debris, glass bottles, furniture, and other materials likely to be in MDA B. Furthermore, it is not clear how this approach will aid in the estimation of the types of hazardous materials present. NMED does not believe that drilling through the middle of a landfill is either a more effective or safer field practice than using a backhoe to systematically expose soil and waste material. The backhoe method is a standard industry practice and is both more practical and effective because it enables observation of a cross section of the entire trench contents. NMED will nevertheless allow the Permittees to proceed.

Specific Comments:

2. **Section: Laboratory Screening, page 3:**

Permittees' Statement: "The 4-ft sample liners will be split open in a sample preparation fume hood at an off-site laboratory under negative pressure to avoid the spread of contamination."

NMED Comment: In the *Laboratory Analysis* Section, the Permittees state, "[c]ore segments will be composited in the laboratory for off-site contract laboratory analysis..." It is unclear whether the Permittees intend to split open the 4-ft liners in the field in a fume hood or at an off-site contract laboratory. Therefore, the Permittees must conduct all the proposed sample access and analysis at an off-site contract laboratory.

3. **Table 3: Summary of Analytical Requirements for MDA B Hazardous Constituents, page 8:**

NMED Comment: The Permittees must analyze all core samples for PCBs.

The Permittees must submit the DPT Investigation Report to NMED no later than September 30, 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.

Please contact Kathryn Roberts at (505) 476-6041 should you have any questions.

Sincerely,

James P. Bearzi
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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