TA21

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us

BILL RICHARDSON
Governor

DIANE DENISH
Lieutenant Governor

RON CURRY
Secretary

JON GOLDSTEIN
Deputy Secretary

ENTERED

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 4, 2009

David Gregory
Federal Project Director
Los Alamos Site Office
Department of Energy
3747 West Jemez Rd. 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
PHASE III WORK PLAN FOR MATERIAL DISPOSAL AREA T,
CONSOLIDATED UNIT 21-016(a)-99,
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-09-012

Dear Messrs. Gregory and McInroy:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and the Los Alamos National Security L.L.C.'s (LANS) (collectively, the Permittees) *Phase III Investigation Work Plan for Material Disposal Area T, Consolidated Unit 21-016(a)-99* (Plan), dated April 17, 2009 and referenced by LA-UR-09-2140/EP2009-0187. NMED has reviewed the Work Plan and hereby issues this Approval with the following modifications.

COMMENTS

1. In order to collect comparable vapor sample data, the vapor monitoring well at location 21-25262 must have ports in approximately the same intervals as well 21-603059 (i.e., ports at the following depths (feet below ground surface): 77.5-82.5, 187.5-192.5, 229.5-234.5, 292.5-297.5, 372.5-377.5). The ports in 21-25262 should generally correspond to the same depth intervals.

31528

The vapor monitoring ports in the proposed North Perimeter Road borehole must correspond as closely as possible to the port depths in locations 21-603058 and 21-25264. The same methodology must be utilized to install the vapor monitoring near Building 21-257 when corrective actions are complete, the piping is removed and confirmation samples are collected and analyzed. The Permittees must revise the depths listed in Table 2 to reflect this approach, ensure the drillers are aware of the change and submit a revised table to NMED.

2. The Permittees state in the "Rationale for Vapor-Monitoring Well Locations" section that, "[s]ampling of the newly installed wells will begin 14 d[ays] following installation although the previous sampling data appear to indicate that the well will not have reached equilibrium conditions when the first quarter sampling will be conducted." The Permittees must purge the vapor monitoring wells appropriately within 14 days of installation so the subsurface air samples collected are representative of natural conditions. Proper well purging should ensure that formation air is being sampled.

3. In the "Drilling Approach" section, the Permittees state (regarding the Building 21-257 borehole), "[t]he specific location of this well will be determined after corrective actions are completed, the subsurface piping is removed, and confirmation samples are collected and analyzed." Based on discussions with the Permittees during a meeting on March 23, 2009 it was decided that dividing the proposed investigation activities at MDA T would accelerate the remediation of the site. A portion of the work to be completed at MDA T will be conducted under DP Aggregate Area. NMED believes installation of a borehole near building 21-257 should be proposed following the DP Aggregate field activities rather than in the MDA T Phase III Work Plan. The Permittees must submit a work plan for the vapor monitoring well at Building 21-257 in conjunction with a work plan for DP Aggregate.

Please contact Kristen Van Horn at (505) 476-6046, should you have any questions.

Sincerely,

James P. Bearzi
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
K. Roberts, NMED HWB
S. Yanicak, NMED DOE OB, MS J993
T. Skibitski, NMED DOE OB
L. King, EPA 6PD-N
G. Rael, DOE LASO, MS A316
M. Graham, ENV MS M991

File: Reading and LANL '09, TA-21