



Environmental Programs
 P.O. Box 1663, MS M991
 Los Alamos, New Mexico 87545
 (505) 606-2337/FAX (505) 665-1812

TA21



ENTERED

National Nuclear Security Administration
 Los Alamos Site Office, MS A316
 Environmental Restoration Program
 Los Alamos, New Mexico 87544
 (505) 667-4255/FAX (505) 606-2132



Date: August 21, 2009
 Refer To: EP2009-0409

James Bearzi, Bureau Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505-6303

Subject: Request for Approval of the Phase III Investigation Report Outline for Material Disposal Area T, Consolidated Unit 21-016(a)-99, Technical Area 21

Dear Mr. Bearzi:

Enclosed please find the proposed outline for the Material Disposal Area (MDA) T Phase III investigation report (Attachment 1). This outline closely follows the one presented in the New Mexico Environment Department's Compliance Order on Consent but has been modified slightly to summarize one section (Background) already discussed in a previous investigation report and eliminate one appendix (Risk Assessment) that is not applicable to this investigation. These modifications were agreed to in correspondence with your staff dated June 4 and June 8, 2009 (Attachment 2). Los Alamos National Laboratory and the U.S. Department of Energy request that you review the attached outline and provide comments and/or approval so we may produce the report to your satisfaction and within the September 18, 2009, milestone deadline.

If you have any questions, please contact Bruce Wedgeworth at (505) 231-0108 (brucew@lanl.gov) or Ed Worth at (505) 606-0398 (eworth@doeal.gov).

Sincerely,

Sincerely,

Michael J. Graham, Associate Director
 Environmental Programs
 Los Alamos National Laboratory

David R. Gregory, Project Director
 Environmental Operations
 Los Alamos Site Office



MG/DG/BC/BW:sm

Attachments: (1) Proposed outline for the MDA T Phase III investigation report
(2) Emails dated June 4, 2009, and June 8, 2009

Cy: (w/enc.)
Ed Worth, DOE-LASO, MS A316
Bruce Wedgeworth, EP-TA-21, MS C349
Kristine Smeltz, EP-WES, MS M992
RPF, MS M707 (with two CDs)
Public Reading Room, MS M992

Cy: (w/o enc.)
Tom Skibitski, NMED-OB, Santa Fe, NM
Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-OB, White Rock, NM
Keyana DeAguero, DOE-LASO (date-stamped letter emailed)
Michael J. Graham, ADEP, MS M991
Alison M. Dorries, EP-WES, MS M996
Bill Criswell, EP-TA-21, MS C349
IRM-RMMSO, MS A150 (date-stamped letter emailed)

PROPOSED OUTLINE FOR THE MATERIAL DISPOSAL AREA T PHASE III INVESTIGATION REPORT

- 1.0 Introduction
- 2.0 Background
 - 2.1 Disposal, Discharges, and Releases
 - 2.2 Previous Investigations
- 3.0 Scope of Activities
 - 3.1 Field Activities
 - 3.2 Health, Safety, and Security
 - 3.3 Waste Management and Disposal
 - 3.4 Deviations
- 4.0 Field Investigation Results
 - 4.1 Drilling and Sampling of Well 21-25262
 - 4.1.1 Drilling, Field Screening, and Solid Media Sampling
 - 4.1.2 Subsurface Vapor Sampling with a Single Packer System
 - 4.1.3 Well Installation
 - 4.2 Solid Media Field-Screening Results
 - 4.3 Subsurface Vapor Sampling from Permanent Vapor-Monitoring Wells
 - 4.3.1 Well 21-25262
 - 4.3.2 Wells 21-25264, 21-603058, and 21-603059
 - 4.4 Subsurface Vapor Field-Screening Results
- 5.0 Regulatory Criteria
 - 5.1 Pore-Gas Screening Evaluation
- 6.0 Site Contamination
 - 6.1 Identification of Chemicals of Potential Concern
 - 6.1.1 Solid Media
 - 6.1.2 Subsurface Vapor
 - 6.2 Nature and Extent of Contamination
 - 6.2.1 Solid Media
 - 6.2.2 Subsurface Vapor
 - 6.3 Potential Sources of Subsurface Vapor Contamination
 - 6.4 Time-Dependent Vapor Analysis
 - 6.5 Volatile Organic Compound Screening Evaluation
- 7.0 Conclusions
- 8.0 Recommendations
- 9.0 References and Data Sources

Appendixes

- Appendix A Acronyms, Abbreviations, and Metric Conversion Table
- Appendix B Field Methods
- Appendix C Field Documentation (Photos, etc.)
- Appendix D Analytical Reports and Results (See enclosed CD)
- Appendix E Analytical Program
- Appendix F Waste Management

From: Van Horn, Kristen, NMENV [mailto:Kristen.VanHorn1@state.nm.us]
Sent: Monday, June 08, 2009 4:25 PM
To: Bruce Wedgeworth
Subject: RE: Phone Summary Letter

Bruce,
I received your voicemail from earlier today. Confirming that it's Phase III and not IIII and that everything else seemed fine.

Thanks,
Kristen

From: Bruce Wedgeworth [mailto:brucew@lanl.gov]
Sent: Thursday, June 04, 2009 3:25 PM
To: Van Horn, Kristen, NMENV
Subject: Phone Summary Letter

Kristen,

Ther last line of paragraph 5 should say "Phase III" not "Phase IIII"

Thanks,

Bruce Wedgeworth
Los Alamos National Laboratory
EP-TA21, MDAs A and T Project Leader
TA-21, Trailer 9000
PO Box 1663, Mail Stop C349
Los Alamos, NM 87545
505-231-0108 (c)
505-606-1526 (f)
brucew@lanl.gov

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Kristen,

The following is a summary of our phone conversation at about 1:45 on May 27, 2009 regarding the MDA T investigation report (IR) and deadline.

Your letter dated May 26, 2009 says that LANL must submit the Phase III Investigation Report to NMED no later than September 18, 2009. BW pointed out that Table 1 in the Phase III Work Plan indicates that the 950-ft-deep proposed vapor monitoring well on North Perimeter Road would start June 15, 2009 and take 115 days to drill and install. The 115 days ends on October 7, 2009, well beyond the September 18, 2009 date. The letter does not specify what should be included in the IR.

KVH said NMED was mostly interested in obtaining the latest VOC data from all of the MDA T vapor monitoring wells and that the drilling and sampling of the 950-ft-deep well will not have to be included in the September 18, 2009 IR submittal. KVH said that after drilling of this well has been completed and LANL has a better feel for the schedule LANL should send a request for extension letter to NMED explaining when the new well will be finished and samples collected and analyzed and propose a new date for the submittal of the IR.

BW said that vapor monitoring well 21-25262 should be completed by about May 29, 2009 and sampled 14 days later, on or about June 12. KVH agreed.

The IR should include the drilling data and the first round of vapor data from 21-25262 and the North Perimeter Road location. The June 2009 (from all vapor monitoring wells at MDA T) data may be included, but should also be submitted in a Quarterly Vapor Monitoring Report as per NMED's May 26, 2009 Correction to Approval with Modifications for the Phase III WP at MDA T.

KVH said the IR does not need a risk assessment.

KVH said the Background section in the IR should point back to the 2006 IR.

BW said LANL is trying to meet the March, June, September, and December schedule for collecting vapor samples outlined in the NMED May 26, 2009 letter. The last round of vapor samples were collected in April 2009 (later than the March date) but LANL can still meet the July 31, 2009 submittal date for the Vapor Monitoring Report. LANL will thereafter meet the schedule in the NMED May 26, 2009 letter.

Please send an e-mail letting me know if you agree or have any comments/changes with this summary.

Thanks,
Bruce Wedgeworth