



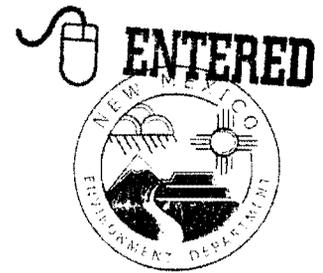
BILL RICHARDSON  
Governor

DIANE DENISH  
Lieutenant Governor

T221  
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.nmeny.state.nm.us](http://www.nmeny.state.nm.us)



RON CURRY  
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 17, 2010

Michael J. Graham  
Associate Director Environmental Programs  
Los Alamos National Security, L.C.C.  
P.O. Box 1663, MS M991  
Los Alamos, NM 87545

George J. Rael  
Environmental Operations Manager  
Los Alamos Site Office  
Department of Energy  
3747 West Jemez Rd, MS A316  
Los Alamos, NM 87544

**RE: APPROVAL WITH MODIFICATIONS  
PERIODIC MONITORING REPORT FOR VAPOR-SAMPLING  
ACTIVITIES AT MATERIAL DISPOSAL AREA T,  
CONSOLIDATED UNIT 21-016(a)-99, AT TECHNICAL AREA 21,  
JUNE TO AUGUST 2009  
LOS ALAMOS NATIONAL LABORATORY  
EPA ID #NM0890010515  
HWB-LANL-09-071**

Dear Messrs. Graham and Rael:

The New Mexico Environment Department (NMED) received the United States Department of Energy (DOE) and the Los Alamos National Security L.L.C.'s (LANS) (collectively, the Permittees) *Periodic Monitoring Report for Vapor-Sampling Activities at Material Disposal Area T, Consolidated Unit 21-016(a)-99, at Technical Area 21, June to August 2009* (Report), dated October 2009 and referenced by LA-UR-09-6878/EP2009-0537. NMED has reviewed the Report and hereby issues this Approval with the following modifications.

Comments

1. In the Executive Summary, paragraph 7, page v, and in Section 6.0 (Summary), paragraph 5, page 8, the Permittees state that "[i]n]onthly sampling of vapor-



monitoring wells 21-25262, 21-25264, 21-603058, and 21-603059 and quarterly reporting will continue until June 2010 in conjunction with the installation and sampling of additional vapor-monitoring wells at MDA T." The Permittees must sample the vapor-monitoring wells and report quarterly until otherwise determined by NMED. In future monitoring reports, the Permittees must explain the purpose of sampling monthly, rather than quarterly.

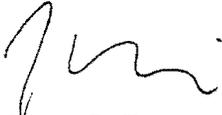
2. In Section 1.0 (Introduction), page 1, the Permittees state that "[t]his report primarily presents and discusses all results obtained during the latest monitoring activities (June–August 2009, rounds 7, 8, and 9); however, vapor data presented and evaluated in the last periodic monitoring report for MDA T (rounds 5 and 6) are also included in the data evaluation section of this report, as appropriate, for comparison as well as for establishing trends over time. The MDA T vapor data collected during rounds 1–6 are presented and discussed in previous periodic monitoring reports as well as the Phase III investigation report (LANL 2009, 105187; LANL 2009, 106665; LANL 2009, 107106)." The Permittees' use of "round" throughout the Report to describe the vapor sampling is confusing, because "round" is used to describe both quarterly sampling and monthly sampling. The Permittees must differentiate between quarterly and monthly sampling events in future vapor-monitoring reports.
3. In Table 4.0-1 (Summary of Pore-Gas Field-Screening Results, September – November 2009) the percent oxygen (O<sub>2</sub>) and percent carbon dioxide (CO<sub>2</sub>) readings vary considerably. No revision to the Report is necessary; however, in future Periodic Monitoring Reports the Permittees must discuss the wide range of O<sub>2</sub> readings. The Permittees must consider improper instrument calibration as a reason, and if found to be a cause, rectify it.
6. In Table 5.1-1 (Summary of VOCs in Pore-Gas Samples at MDA T, June-August 2009), the Permittees only list the results of the sampling from June through August of 2009. In accordance with Section XLD.11 of the March 1, 2005 Order on Consent (Order) the Permittees must furnish data from three previous sampling quarters along with the most recent data. No revision to the Report is necessary; however, in future periodic monitoring reports, the Permittees must include data from the three previous quarters as well as the current quarter (all monthly data, if collected during the reporting period must also be included).

Messrs. Graham & Rael  
February 17, 2010  
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The Permittees must incorporate NMED's comments in future Periodic Monitoring Reports. 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 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  
K. Van Horn, NMED HWB  
S. Yanicak, NMED DOE OB, MS M894  
T. Skibitski, NMED DOE OB  
L. King, EPA 6PD-N  
V. George, MS M991  
K. Lynnes, MS M991

File: Reading and LANL '10, TA-21 (SWMU 21-016(a)-99)