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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

October 27, 2015

Doug Hintze
EM-LA
Environmental Projects Office
Los Alamos Field Office
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Michael T. Brandt
Associate Director
Environment, Safety, Health
Los Alamos National Security, L.L.C.
P.O. Box 1663, MS M991
Los Alamos, NM 87545

RE: DISAPPROVAL
DP SITE AGGREGATE AREA BUILDING 21-257 FOOTPRINT
LETTER WORK PLAN
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-14-059

Dear Messrs. Hintze and Brandt:

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) *DP Site Aggregate Area Building 21-257 Footprint Letter Work Plan* (Plan) dated and received September 30, 2014, and referenced by LA-UR-14-26889/EP2014-0427.

NMED has reviewed the Plan and hereby issues this disapproval. The Permittees must address the following comments in a revised work plan.

37384

Comments:

1. **Section 2.0, Background and Scope of Activities, p 1**

   Permittees' Statement: "Installation of a vapor-monitoring well near or beneath the building 21-257 footprint was prescribed by the New Mexico Environment Department (NMED) in the MDA T Phase III investigation report Notice of Disapproval and was agreed to by the Laboratory (LANL 2009, 108010). However, in a 2011 letter (NMED 2011, 207573), NMED stated that vapor monitoring is no longer necessary at the site because adequate vapor data are available to complete the corrective measures evaluation for MDA T."

   NMED's Comment: NMED may require the installation of a vapor-monitoring well near or beneath the building 21-257 footprint in the future based on the results of this investigation. No response necessary.

2. **Section 2.3, Scope of Activities for Building 21-257, p 8**

   Permittees' Statement: "The proposed sampling locations for the building 21-257 footprint are shown in Figure 2.3-1. Table 2.3-1 provides a summary of the proposed sampling objectives, number of samples, sampling locations and depths, and analytical suites."

   NMED's Comment: In addition to the sample locations shown, add four sample locations along and below the approximately 50 ft long three inch process drain line from sample location 20 just east of building 21-257 to sample location 47 at the outfall. Leaks in subsurface piping, especially at joints, are typical locations for contaminant releases to the environment. The Permittee must make every effort to locate these sample locations where junctions in the piping system are located or where soil staining or other evidence of a release is observed. Provide updated figures and tables in the revised work plan.

3. **Section 2.3, Scope of Activities for Building 21-257, p 8**

   Permittees' Statement: "The investigation methods outlined in section 8 of the approved Delayed Sites work plan will be implemented to perform this work (LANL 2009, 108166.9; NMED 2010, 108443). A list of the standard operating procedures (SOPs) used to guide the fieldwork and sampling is available at http://www.lanl.gov/community-environment/environmental-stewardship/plans-procedures.php. The SOPs are also available in the electronic public reading room at http://eprr.lanl.gov/oppie/service. As discussed in Appendix B of the approved Delayed Sites work plan (LANL 2009, 108166.9; NMED 2010, 108443), all investigation-derived waste generated will be managed in accordance with the current version of EP DIR-SOP-10021, Characterization and Management of Environmental Program Waste."

   NMED's Comment: Revise the Plan to include detailed descriptions of all sampling and analysis activities to be performed during the investigation in accordance with Section IX.A

of the Consent Order.

4. Section 2.3, Scope of Activities for Building 21-257, p 8

Permittees' Statement: "The locations selected for extended-suite analysis are areas where contaminants had the most potential to be released to the environment (e.g., floor drains, tanks; Table 2.3-1). Where field-screening results identify locations with higher readings than locations already selected for extended-suite analyses (locations 1, 2, 5, 6, 7, 14, 16, 17, 29, 35, 41, 43, and 46–52), they will also be sampled and analyzed for the extended suite."

NMED's Comment: In addition to the listed locations, add the following locations, which have high potential for contaminant releases to the environment, to the extended-suite analysis list:

- 20 - 90° junction in 3" process drain, likely leak location
- 28 - floor drain below one of the highest recorded contamination areas
- 32 - floor drain below one of the highest recorded contamination areas
- 34 - floor drain below one of the highest recorded contamination areas
- 37- eastern waste line entry point
- 40 - western waste line entry point, and
- 42 - exterior location near waste holding tanks with high recorded contamination.

As stated in Comment #2, leaks in subsurface piping, especially at joints, are typical locations for contaminant releases to the environment. The Permittee must make every effort to locate these sample locations where junctions in the piping system are located or where soil staining or other evidence of a release is observed.

5. Figures 2.0-1, 2.1-1, 2.3-2, 2.3-3

NMED's Comment: AOC-C-21-007 is mislabeled on these four figures. Correct the figures in the revised work plan.

The Permittees must submit a revised work plan no later than **December 30, 2015**.

Should you have any questions or comments, please contact Ben Wear at (505)-476-6041.

Sincerely,

John E. Kieling
Chief
Hazardous Waste Bureau

cc: K. Roberts, NMED RPD
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File: Reading and LANL 2015, TA-21, Delta Prime Site Aggregate Area