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NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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RON CURRY
Secretary

JON GOLDSTEIN
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 28, 2008

David Gregory
Federal Project Director
Los Alamos Site Office
Department of Energy
528 35th Street, 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 MODIFICATION
PILOT TEST WORK PLAN FOR EVALUATING VAPOR-SAMPLING
SYSTEMS AT MATERIAL DISPOSAL AREA C
LOS ALAMOS NATIONAL LABORATORY (LANL)
EPA ID #NM0890010515
HWB-LANL-07-008**

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) *Pilot Test Work Plan for Evaluating Vapor-Sampling Systems at Material Disposal Area C* (Plan), dated March 2008 and referenced by LA-UR-08-1614/EP2008-0144. NMED has reviewed the Plan and hereby issues this Approval with the following modification.

1) Evaluation of Results and Decision Process, page 4, paragraph 2:

Permittees' Statement: "Individual results will be considered significantly different if the two corresponding results for a single depth have more than 20% RPD, and the systems will be considered different if 50% or more of the single comparisons are significantly different."

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NMED Comment: The Permittees must make a comparison of the results based on statistical test analysis of the volatile organic compound (VOC) and tritium concentrations obtained using the three different types of sampling methods, rather than the arbitrary cut-off lines of 20% and 50%. A confidence level of 95% must be achieved to conclude whether or not one sampling method could provide comparable VOC or tritium data. Without support of a statistical test, it is difficult to determine whether the differences in VOC and tritium mean values obtained using the three types of sampling methods are statistically significant, or simply result from variations in the concentrations from each type of sampling method. The statistical test on the data sets to be collected from these comparison tests is critical because historic concentrations of most VOCs and tritium collected from each sampling port vary greatly and could overlap each other among all three types of sampling methods. The statistical methods and procedures (*e.g.*, t-test) specified in subtitle C of the Resource Conservation and Recovery Act (RCRA) (40 CFR Part 264.97 *General Ground-Water Monitoring Requirements*) are acceptable to NMED.

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. The report documenting the results of the pilot test must be submitted to NMED no later than June 25, 2008 as proposed in the Plan.

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

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc:

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File: Reading and LANL '08, TA-50 (SWMU 50-009)