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Date: October 15, 2004

Refer To: ER2004-0584

Mr. James Bearzi
 NMED-Hazardous Waste Bureau
 2905 Rodeo Park Drive East
 Building 1
 Santa Fe, NM 87505-6303



SUBJECT: RESPONSE TO NOTICE OF DISAPPROVAL FOR THE INVESTIGATION WORK PLAN FOR MATERIAL DISPOSAL AREA G, SOLID WASTE MANAGEMENT UNIT 54-013(b)-99, AT TECHNICAL AREA 54, REVISION 1 LOS ALAMOS NATIONAL LABORATORY, NM8900010515

Dear Mr. Bearzi:

On September 17, 2004, Los Alamos National Laboratory (LANL) and the Department of Energy (DOE) received the subject Notice of Disapproval (NOD) letter, dated September 14, 2004 and referenced by HWB-LANL-04-008. The attachment to this NOD letter contained the Hazardous Waste Bureau (HWB) comments related to the disapproval. The NOD letter required LANL and DOE to respond to these comments within 30 days of receipt of the letter. On September 23, 2004, LANL, DOE, and HWB staff met at Technical Area 54 to discuss issues related to the comments, including the locations for siting proposed boreholes.

Attached are LANL's and DOE's responses to the comments contained in the NOD letter attachment. These responses explain the basis for changes that will be made to the work plan based on the comments and site visit. In some cases, LANL and DOE do not agree with the comments and our responses explain the basis for disagreement.

We appreciate the opportunity to work with your staff as the site visit resolved many issues. Please contact John Hopkins at 505-667-9551 or Woody Woodworth at 505-665-5820 If you have any questions.

Sincerely,

for David McInroy, Deputy Project Director
 Remediation Services
 Los Alamos National Laboratory

Sincerely,

David Gregory, Federal Project Director
 Department of Energy
 Los Alamos Site Operations



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DM/DG/JE/jr

Attachment: LANL's and DOE's responses to the comments contained in the NOD letter attachment.

Cy:(w/att.)

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Cy:(w/o att.)

D. McInroy, RRES-RS, MS M992
B. Rich, ADO, MS A104
C. Voorhees, NMED-OB

**Response to
Notice of Disapproval for the
Investigation Work Plan for Material Disposal Area G, Solid Waste Management Unit 54-013(b)-99
at Technical Area 54, Revision 1, Dated September 14, 2004,
Los Alamos National Laboratory, NM0890010515, HWB-LANL-04-008**

INTRODUCTION

To facilitate review of this response, the New Mexico Environment Department's (NMED's) comments are included verbatim. The comments are divided into general and specific categories, as presented in the notice of disapproval. Los Alamos National Laboratory's (LANL's or the Laboratory's) responses follow each NMED comment.

GENERAL COMMENTS

NMED Comment

1. *The Permittees have changed the descriptions of Area G/MDA G over the years. For example:*

<i>March 1997:</i>	<i>MDA G is 100 acres, 65 acres used for disposal</i>
<i>January 1999:</i>	<i>Area G is 65 acres, 35 cells, approximately 260 shafts and 4 trenches</i>
<i>March 2000:</i>	<i>MDA G is 100 fenced acres, 65 acres have been and are currently used for disposal</i>
<i>September 2003:</i>	<i>MDA G is a subsurface disposal area</i>
<i>June 2004:</i>	<i>Area G is 65 fenced acres, currently used for LLW and radioactive/PCB waste disposal. MDA G includes 32 pits, 194 shafts, and 4 trenches and is located within Area G</i>
<i>July 8, 2004:</i>	<i>Area G extends to the west to just east of MDA L</i>

The Permittees have used the terms "Area G" and "MDA G" interchangeably. The Permittees must refer to this unit as MDA G as described above in March 1997 and as described in the proposed Consent Order.

LANL Response

1. The Permittees agree that past use of the terms "Material Disposal Area (MDA) G" and "Area G" in other reports and plans is confusing. However, the Permittees' use of the terms "MDA G" and "Area G" in the revised MDA G work plan is consistent with the September 1, 2004, Proposed Consent Order and should not be changed as indicated in NMED's comment. Specifically, Section IV.C.1.a includes the following definition of facilities at Technical Area (TA-) 54:

TA-54 includes four MDAs designated MDA G, H, J, and L; a waste characterization, container storage, and transfer facility (transfer facility); active radioactive waste storage and disposal operations at Area G (which are not covered under this Consent Order), active hazardous and mixed waste storage operations at Area L (which are not covered under this Consent Order), and administrative and support areas.