

TASY

State of New Mexico
ENVIRONMENT DEPARTMENT

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 13, 2006

David Gregory, Federal Project Director
Los Alamos Site Office, Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, NM 87544

David McInroy, Deputy Program Director
Environmental Remediation and Surveillance
Los Alamos National Laboratory
P.O. Box 1663, Mail Stop M992
Los Alamos, NM 87545

RE: RESPONSE TO NOTICE OF DISAPPROVAL AND SUPPLEMENT TO NOTICE OF DISAPPROVAL FOR THE "INVESTIGATION REPORT FOR MATERIAL DISPOSAL AREA (MDA) G, CONSOLIDATED UNIT 54-013(b)-99, AT TECHNICAL AREA 54" LOS ALAMOS NATIONAL LABORATORY, DATED AUGUST 31, 2006
EPA ID #NM0890010515
HWB-LANL-05-019

Dear Messrs. Gregory and McInroy:

In Notices Of Deficiency (NODs) dated July 26 and August 4, 2006, NMED requested that the United States Department of Energy and Los Alamos National Security (collectively, the Permittees) advance a boring to further investigate increasing tritium concentrations with depth in the vicinity of Trenches A through D at Consolidated Unit 54-013(b)-99 (MDA G). NMED has received and reviewed the Permittees' Response dated August 31, 2006 and referenced by EP2006-0752, in which the Permittees assert that advancement of such a boring was not necessary to define the extent of volatile organic compounds (VOCs) in the subsurface at the site.

The purpose of the supplemental work plan required in the NOD is to collect information on the vertical transport of contaminants. Tritium was detected in borehole 54-0111 at a concentration of 1.58×10^8 pico-curies per liter (pCi/L) at the depth of 139 feet - 6,000 times higher than the concentration of 26,500 pCi/L reported at the depth of 40 feet in the same borehole. Such a large increase in tritium concentrations with depth suggests the likelihood of preferential pathways for downward transport of contaminants beneath the site that may result in rapid contaminant



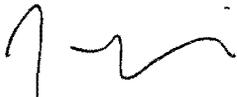
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transport toward the regional water table. A deeper borehole in the vicinity of borehole 54-0111 will provide essential information to evaluate important transport processes occurring in the vadose zone and reasonably define the total depth where contaminants may have accumulated at high concentrations. NMED considers such information as a prerequisite for selecting appropriate corrective measures for MDA G in the future, and expects that one additional borehole in the vicinity of borehole 54-0111 will be included in the supplemental work plan.

Should you have any questions or comments, please contact Dave Cobrain at (505) 428-2553 or Hai Shen at (505) 428-2539.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:hs

cc: D. Cobrain, NMED HWB
J. Young, NMED HWB
H. Shen, NMED HWB
T. Skibitski, NMED DOE OB
S. Yanicak, NMED DOE OB, MS J993
L. King, EPA 6PD-N
A. Phelps, LANL, EP-CA, MS 992
J. Hopkins, LANL, EP-CA, MS M992

file: Reading and ~~54 (MDA G SWMU 54-0111)~~