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NEW MEXICO  
ENVIRONMENT DEPARTMENT



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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

May 1, 2008

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

David McInroy  
Remediation Services Deputy Project Director  
Los Alamos National Laboratory  
P.O. Box 1663, Mail Stop A992  
Los Alamos, NM 87545

**RE: APPROVAL WITH DIRECTION FOR THE RESPONSE TO THE REVIEW OF PERIODIC MONITORING REPORT FOR VAPOR SAMPLING ACTIVITIES AT MATERIAL DISPOSAL AREA G, TECHNICAL AREA 54, FOR FISCAL YEAR 2007 AND SUBMITTAL OF PILOT TEST WORK PLAN FOR EVALUATING TYPE 4 VAPOR-SAMPLING SYSTEMS AT MATERIAL DISPOSAL AREA G, LOS ALAMOS NATIONAL LABORATORY  
EPA ID #NM0890010515  
HWB-LANL-07-022**

Dear Messrs. Gregory and McInroy:

The New Mexico Environment Department (NMED) is in receipt of the United States Department of Energy and Los Alamos National Security, LLC (collectively, the Permittees) document entitled *Response to the Review of Periodic Monitoring Report for Vapor Sampling Activities at Material Disposal Area G, Technical Area 54, for Fiscal Year 2007 and Submittal of Pilot Test Work Plan for Evaluating Type 4 Vapor-Sampling Systems at Material Disposal Area G* (hereafter, the Response) dated April 18, 2008 and referenced by EP2008-0194. NMED has reviewed the Response and hereby issues this approval with the following direction.

1. NMED generally agrees with the Permittees' Responses to Comments 1 and 2 specified in NMED March 14, 2008 letter, and therefore approves Attachment 2 (*Replacement Pages for Periodic Monitoring Report for Vapor-Sampling Activities at*



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Messrs. Gregory and McInroy

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*Material Disposal Area G, Technical Area 54, for Fiscal Year 2007) and Attachment 4 (Pilot Test Work Plan for Evaluating Type 4 Vapor-Sampling Systems at Material Disposal Area G) in the Response.*

2. Data was presented in the Response regarding comparison of volatile organic compound (VOC) concentrations detected in the subsurface pore gas beneath MDA G and MDA C. NMED does not object the Permittees' proposal to use the ongoing pilot-test results (VOC and tritium data) that are being collected at MDA C for comparing the FLUTE sampling system with other vapor-monitoring systems (including packer and stainless-steel tubing sampling systems). Based on the manufacturer's statement (Attachment 1 in the Response and other correspondences), however, the current FLUTE sampling systems that are designed and tested for MDA C are superior to the original FLUTE (SEAMIST) systems that were installed at MDA G.

If the results collected from MDA C are used directly to support a comparison of the FLUTE systems installed at MDA G with other sampling systems, the Permittees must provide data to demonstrate that the spacer and tubing in the FLUTE system installed at MDA G, which directly contact the air being sampled, are constructed with the same materials as those FLUTE systems currently being tested at MDA C. If the materials are different, the Permittees must replace the old FLUTE systems installed at MDA G with the system currently used at MDA C, if NMED approves the FLUTE system being tested at MDA C as a reliable vapor-phase VOC sampling method. Alternatively, the Permittees may conduct additional tests at either MDA G or MDA C to determine that VOC concentrations collected using the type of FLUTE systems installed at MGA G are consistent with data collected using other sampling systems as required by Comment 2 in the NMED March 14, 2008 letter.

The Permittees must complete the proposed pilot test for evaluating Type 4 vapor-sampling systems at MDA G and submit the report to NMED no later than August 15, 2008, as proposed by the Permittees. In addition, the Permittees must provide information to NMED no later than June 25, 2008 to prove that the same materials have been used for constructing the spacer and tubing of the FLUTE systems installed at MDAs G and C, respectively. If different materials are used for constructing the spacer and tubing at the two locations, the Permittees must propose, no later than June 25, 2008, to replace the old FLUTE system installed at MDA G with the type of system used at MDA C, if approved by NMED. Alternatively, the Permittees may submit a work plan to conduct additional tests necessary to address the above Comment 2 to NMED no later than May 15, 2008.

Messrs. Gregory and McInroy  
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Should you have any questions or comments, please contact Dave Cobrain at (505) 476-6055 or Hai Shen at (505) 476-6039.

Sincerely,



James P. Bearzi  
Chief  
Hazardous Waste Bureau

JPB:hs

cc: D. Cobrain, NMED HWB  
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file: Reading and LANL TA-54 (MDA G, SWMU 54-013(b))