



NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Hazardous Waste Bureau*

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JON GOLDSTEIN  
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 27, 2009

David Gregory  
Federal Project Director  
Los Alamos Site Office  
Department of Energy  
3747 West Jemez Road, 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: NOTICE OF DISAPPROVAL  
PERIODIC MONITORING REPORT FOR VAPOR SAMPLING ACTIVITIES  
AT MATERIAL DISPOSAL AREA (MDA) G, AT TECHNICAL AREA 54,  
FOR FISCAL YEAR 2008  
LOS ALAMOS NATIONAL LABORATORY,  
EPA ID #NM0890010515  
HWB-LANL-08-057**

Messrs. Gregory and McInroy:

The New Mexico Environment Department (NMED) is in receipt of the Department of Energy (DOE) and the Los Alamos National Security, L.L.C.'s (LANS) (collectively, the Permittees) *Periodic Monitoring Report for Vapor-Sampling Activities at Material Disposal Area G, at Technical Area 54, for Fiscal Year 2008* (Report), referenced by LA-UR-08-7862/EP2008-0633 and dated December 2008. NMED has reviewed the Report and hereby issues this Notice of Disapproval (NOD).

31513



**Comments:**

**1) Table 5.0-1, VOCs Detected in Pore-Gas Samples Collected During Monitoring Activities at MDA G, page 59:**

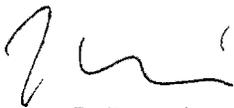
a) **NMED Comment:** The Permittees did not include the previous three quarters of volatile organic compound (VOC) and tritium data for comparison with the quarter being reported. The Permittees must include the current sampling and monitoring data plus data from the three previous monitoring events in accordance with Section XI.D.11 of the March 1, 2005 Order on Consent (Order) (*see* Table 5.0-1, VOC Pore-Gas Results at MDA L in the *Periodic Monitoring Report for Vapor-Sampling Activities at Material Disposal Area L, Solid Waste Management Unit 54-006, at Technical Area 54, First Quarter Fiscal year 2009*).

b) NMED acknowledges that the data supplied on the disc included with the Report provides the results in micro grams per cubic meter ( $\mu\text{g}/\text{m}^3$ ) and parts per billion per volume (ppbv). To facilitate NMED's review of the Report, the Permittees must also present the results in Table 5.0-1 in both  $\mu\text{g}/\text{m}^3$  and ppbv.

The Permittees must address all comments herein and submit replacement pages (Table 5.0-1) for the Report by May 22, 2009. 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. In addition, the Permittees shall submit a redline-strikeout version that includes all changes and edits to the Report (electronic copy) with the response to this NOD.

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

Sincerely,



James P. Bearzi  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
K. Roberts, NMED HWB  
S. Yanicak, NMED DOE OB, MS J993  
T. Skibitski, NMED DOE OB  
L. King, EPA 6PD-N  
G. Rael, DOE LASO, MS A316  
M. Graham, LANS ENV MS J591  
File: LANL, 2009 TA-54 (SWMU 54-013(b)-99)