

54

ENTERED



NEW MEXICO ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

BILL RICHARDSON Governor

2905 Rodeo Park Drive East, Building 1

Santa Fe, New Mexico 87505-6303

RON CURRY Secretary

DIANE DENISH Lieutenant Governor

Phone (505) 476-6000 Fax (505) 476-6030

www.nmenv.state.nm.us

JON GOLDSTEIN Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 23, 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: REVIEW OF PILOT TEST REPORT FOR COMPARING PACKER AND FLUTE VAPOR-SAMPLING SYSTEMS AT MATERIAL DISPOSAL AREA H
LOS ALAMOS NATIONAL LABORATORY EPA ID No: NM0890010515
HWB-LANL-07-042

Dear Messrs. Gregory and McInroy:

The New Mexico Environment Department (NMED) has reviewed the United States Department of Energy and the Los Alamos National Security, LLC (collectively, the Permittees) document entitled Pilot Test Report for Comparing Packer and FLUTE Vapor-Sampling Systems at Material Disposal Area H (Report), dated September 2008 and referenced by LA-UR-08-5872/EP2008-0489.

The Permittees concluded that FLUTE sampling system does not affect pore-gas results because both sampling systems resulted in low detected concentrations of volatile organic compounds (VOCs). NMED agrees that the results of FY 2008 second and third quarter sampling events indicate that there is no significant difference between the two sampling systems. However, NMED disagrees with the Permittee's conclusion that elevated concentrations of VOCs detected in samples collected prior to the installation of the FLUTE system are outliers. The Permittees have not provided sufficient explanation for the presence of VOCs observed in the sampling events of 2005 and 2006. Review of the data collected prior to installation of FLUTE system does not clearly indicate that the elevated concentrations of VOCs are because of cross-contamination of sampling systems. The Permittees must continue to monitor and collect quarterly samples from the existing three boreholes at MDA H as conducted since 2005. The results of vapor monitoring must be submitted within 60 days after completion of the field work

35437



Messrs. Gregory and McInroy
December 23, 2008
Page 2

for each monitoring event.

Please contact Neelam Dhawan of my staff at (505) 476-6042 should you have any questions.

Sincerely,



James Bearzi
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
K. Roberts, NMED HWB
N. Dhawan, NMED HWB
M. Dale, 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, ADEP MS M991

File: Reading and LANL/TA 54/54-004, 2008