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Name:	U1101702
Title:	Approval With Modifications Phase II Investigation Work Plan Upper Sandia Canyon Aggregate Area
Date Received:	9/13/2011
Addressee Name:	Michael Graham, ADEP
Originator:	John Kieling, NMED Santa Fe
Action Item Description:	
Action Due Date:	
Responsible for Action:	Search
Responsible Office:	
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NEW MEXICO
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Governor

JOHN A. SANCHEZ
Lieutenant Governor

DAVE MARTIN
Cabinet Secretary

BUTCH TONGATE
Acting Deputy Secretary

EP2011-5431

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 13, 2011

George J. Rael, Assistant Manager
Environmental Projects Office
Department of Energy/National
Nuclear Security Administration
Los Alamos Site Office
3747 West Jemez Road, MS A316
Los Alamos, NM 87544

Michael J. Graham, Associate Director
Environmental Programs
Los Alamos National Security, LLC
P.O. Box 1663, MS M991
Los Alamos, NM 87545

RE: APPROVAL WITH MODIFICATIONS
PHASE II INVESTIGATION WORK PLAN
UPPER SANDIA CANYON AGGREGATE AREA
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-11-026

Dear Messrs. Rael and Graham:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and the Los Alamos National Security, LLC (LANS) (collectively, the Permittees) *Phase II Investigation Work Plan for Upper Sandia Canyon Aggregate Area, Revision 1* (Plan), dated September 2011 and referenced by LA-UR-11-4912/EP2011-0279 and response to NMED's Notice of Disapproval (NOD). NMED hereby issues this Approval with the following modification.

Modification:
Section B-5.3, Subsurface Tuff Sampling Methods, Page B-4:
The response to NOD Comment number 12 is not adequate. The Permittees were directed to provide a written description of the proposed methods for collection of surface and subsurface

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samples that contains sufficient detail to allow evaluation of sample data quality. Section IX.A of the Consent Order states "The Respondents shall provide a brief description of investigation, sampling or analytical methods and procedures in documents submitted to the Department that includes sufficient detail to evaluate the quality of the acquired data." Section IX.A Order also states that the Permittees may reference relevant Standard Operating Procedures (SOPs), but a reference to SOPs is not a substitute for the required description that must include "sufficient detail to evaluate the quality of the acquired data." The SOPs are updated frequently and NMED is not informed of these updates. It is essential that the methods used or proposed for use in site investigations be adequately documented and descriptions of the methods included in the associated work plans and reports. NMED reviews the information provided in these documents to evaluate the quality of site data. NMED is concerned about the methods used to collect samples for volatile organic compounds (VOCs). The loss of VOCs must be minimized during sample collection procedures.

A similar comment regarding VOC analysis was provided in the second NOD for Lower Sandia Canyon Aggregate Area Investigation Report, issued on September 8, 2011. The Permittees must describe in detail the methods that will be used to collect the samples from the sampling devices, the procedures that will be used to transfer the samples to sampling containers, the types of sample containers to be used, how the sample containers will be filled to eliminate headspace, and the method to be used for storage of the sample containers. Methods to collect samples for different media such as soil, sediment, and tuff, must be described separately. The Permittees must describe every step of sample collection in detail so NMED can determine whether the proposed collection methods will minimize the loss of VOCs during sample collection. The investigation report that summarizes results of the Phase II investigation must contain, in sufficient detail descriptions of the actual methods used for sample collection for all analyses.

The replacement pages providing details of sample collection methods must be submitted no later than **September 30, 2011**. The replacement pages 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 must submit a redline-strikeout version of the replacement pages that includes all changes and edits to the Plan (electronic copy).

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

Sincerely,

John E. Kieling
Acting Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
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K. Rich, EP-CAP, MS M992

File: LANL, Upper Sandia Canyon Aggregate Area Phase II IWP, 2011.
LANL 11-026

LA 081956
DATE 9/15/2001

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Environment Department
Hazardous Waste Bureau
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