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NOV. 2011
NMED Hazardous Waste Bureau

National Nuclear Security Administration
Los Alamos Site Office, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
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Date: NOV 0 1 2011
Refer To: EP2011-0356

John Kieling, Acting Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Request to Reduce the Frequency of Vapor Sampling at Material Disposal Area T

Dear Mr. Kieling:

The U.S. Department of Energy (DOE) and Los Alamos National Security (LANS), LLC, request approval from the New Mexico Environment Department (NMED) to discontinue quarterly vapor sampling at Material Disposal Area (MDA) T and replace it with annual sampling until completion of the corrective measures evaluation (CME) for MDA T.

Vapor sampling (e.g., pore-gas monitoring) at MDA T has been performed since October 2007. The current monitoring program, which is specified in the MDA T subsurface vapor-monitoring plan (LA-UR-07-7037, EP2007-0658) and the Phase III investigation work plan (LA-UR-09-2140, EP2009-0187), has been in place since September 2009. Under this program, volatile organic compound (VOC) and tritium samples are collected quarterly from 34 sampling ports in 5 vapor-monitoring wells. With the completion of the investigations at MDA T in 2009 and the subsequent vapor sampling rounds at the site, the nature and extent of contamination have been defined, and sufficient vapor-phase data have been collected to prepare the CME for MDA T.

The periodic monitoring reports (PMRs) for vapor sampling at MDA T submitted to NMED indicate the vapor data are consistent among sampling rounds. While the VOC vapor concentrations are elevated, the plume itself is stable and is situated over 500 ft above groundwater. VOC concentrations in the deepest ports (at 800 and 955 ft below ground surface) sampled at MDA T are consistently low or are below detection limits and do not exceed the conservative screening values used to ensure protection of groundwater. DOE/LANS will submit the PMR for the most recent vapor samples collected during the fourth quarter of fiscal year (FY) 2011 in January 2012. DOE/LANS propose to discontinue quarterly vapor sampling at MDA T beginning in the first quarter of FY2012 and instead monitor the current approved sampling ports on an annual basis. The next samples would be collected from July to September 2012 and the results reported in an annual PMR 120 days after sampling is complete until completion of the CME at the site. Once a remedy is selected, a vapor-monitoring program will be incorporated in the corrective measures implementation plan, as needed.

If you have any questions, please contact Jarrett Rice at (505) 665-3874 (wjrice@lanl.gov) or Peter Maggiore at (505) 665-5658 (peter.maggiore@nnsa.doe.gov).

Sincerely,

B-GSchappell for MJG

Michael J. Graham, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,

George J. Rael, Assistant Manager
Environmental Projects Office
Los Alamos Site Office

MG/GR/TG:sm

Cy: Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-DOE-OB, MS M894
Jim Davis, NMED-Resource Protection, Santa Fe, NM (date-stamped letter emailed)
Tom Skibitski, NMED-OB, Santa Fe, NM (date-stamped letter emailed)
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