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NEW MEXICO
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Lieutenant Governor

RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

EP2014-5226

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July 8, 2014

Kimberly Davis Lebak
Los Alamos Site Office
Department of Energy
3747 W. Jemez Rd., MS-A316
Los Alamos, NM 87544

Alison M. Dorries, Division Leader
Environmental Protection Division
Los Alamos National Security, LLC
Los Alamos Research Park
P.O. Box 1663, MS K491
Los Alamos, NM 87545

RE: APPROVAL WITH MODIFICATION
TECHNICAL AREA 63 TRANSURANIC WASTE FACILITY SOIL VAPOR MONITORING WORK PLAN
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-14-023

Dear Misses Lebak and Dorries:

The New Mexico Environment Department (NMED) is in receipt of the United States Department of Energy (DOE) and the Los Alamos National Security, L.L.C.'s (collectively, the Permittees) document entitled *Technical Area 63 Transuranic Waste Facility Soil Vapor Monitoring Work Plan* (Work Plan), dated April 17, 2014 and referenced by ENV-DO-14-0091. NMED has reviewed the Permittees' Plan and hereby issues this Approval with the following modification.

Although NMED has directed the Permittees, in past documents, to discontinue citing the plume modeling results for the vapor plume at MDA C, the Work Plan presents the results of the modeling. NMED's issues related to the modeling report were outlined in NMED's May 24, 2012 Disapproval letter. Continued use of modeling results from the report titled "The Vapor Plume at Material Disposal Area C in Relation to Pajarito Corridor Facilities" will likely prevent

the approval of future documents. Remove all reference to this report and its findings in all future documents. This includes, but is not limited to:

1. Modeling based on averaged concentrations (all vapor plume modeling related to risk must be based on maximum detected concentrations)
2. Modeling results or statements in conflict with actual data (e.g., "TCE concentrations have been determined to be significantly lower than the TVL at the ground surface and 20 ft below the surface.")
3. References to Threshold Limit Values (TLVs) instead of site specific Soil Gas Screening Levels (SGSLs)

The Permittee must comply with this modification in all future documents related to the MDA C Vapor Plume and the Transuranic Waste Facility.

Should you have any questions, please contact Ben Wear of my staff at (505) 476-6041.

Sincerely,

John E. Kieling
Chief
Hazardous Waste Bureau

cc: T. Blaine, NMED EHD
D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
B. Wear, NMED HWB
T. Hall, NMED HWB
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G. Turner, DOE-LAFO, MS A316

File: Reading and LANL 2014 – TA-63, Transuranic Waste Facility

New Mexico Environment Department
Hazardous Waste Bureau
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JUL 14 '14 AM 8:15

NAME Deborah Herrera
Z# 082963
DATE 7/14/14