NEW MEXICO
ENVIRONMENT DEPARTMENT

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August 5, 2019

William S. Goodrum, Manager
Department of Energy-NNSA
Los Alamos Field Office
3747 West Jemez Rd, MS A316
Los Alamos, NM 87544

Enrique Torres, Division Leader
Environment Protection & Compliance
Triad National Security, L.L.C.
P.O. Box 1663, MS K491
Los Alamos, NM 87545

U1900773

RE: REVIEW
TECHNICAL AREA 63 TRANSURANIC WASTE FACILITY
SOIL VAPOR MONITORING SYSTEM REPORT, QUARTER 7,
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-19-037

Dear Messrs. Goodrum and Torres:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) National Nuclear Security Administration, Los Alamos Field Office (NA-LA) and the Triad National Security, LLC (Triad) (collectively, the Permittees) *Technical Area 63 Transuranic Waste Facility Soil Vapor Monitoring System Report, Quarter 7* (Report), dated and received June 26, 2019, and referenced by EPC-DO-19-203/LA-UR-19-25727.

Soil vapor monitoring was conducted at Technical Area 63 Transuranic Waste Facility on May 1, 2019, for the seventh quarter of monitoring. The Report indicates that vapor concentrations for volatile organic compounds (VOCs) from the five vapor monitoring wells (VMWs), 1 through 5, did not exceed soil-gas screening levels (SGSLs) for the identified constituents in Tables 3.14.3.1, 3.14.3.2, and 3.14.3.3 of Part 3 of the Los Alamos National Laboratory's RCRA Permit. NMED has completed review of the Report and has the following comment.

Cover Letter, paragraph 3:

Permittees Statement: *This report also presents a statistical evaluation to support a request that NMED-HWB allow LANL to alter the sampling frequency for the monitoring system as provided by the Permit. A permit modification request would be needed to make this revision per Permit Section 3.14.3. A consideration of this statistical analysis is requested to allow a preliminary discussion of NMED-HWB concerns or suggestions regarding the technical basis for such a permit modification.*

NMED Comment: NMED generally agrees with the statistical approach provided to support altering the monitoring frequency. NMED concurs that further discussion should be held between NMED and the Permittees to discuss permit modification request to alter the frequency in accordance with Section 3.14.3 of the Permit. The Permit Section 3.14.3 states *"After the first year of sampling, the Permittees may propose an alternate sampling frequency for subsequent years, in a permit modification request, based on the evaluation of data from the pre-operational and quarterly samples, as well as relevant vapor monitoring data collected from nearby vapor-monitoring locations."*

If you have any questions regarding this letter, please contact Mitchell Schatz (505) 476-6051.

Sincerely,

John E. Kieling
Chief
Hazardous Waste Bureau

cc:

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