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| Name: | U1200301 | | | |
| Title: | Periodic Monitoring Report for Vapor-Sampling Activities at Material Disposal Area G, at Technical Area 54, for Fiscal Year 2011 Los Alamos National Laboratory (LANL) EPA ID #NM0890010515 HWB-LANL-12-003 | | | |
| Date Received: | 2/10/2012 | | | |
| Addressee Name: | Michael Graham, ADEP | | | |
| Originator: | John E. Kieling, NMED, Santa Fe, New Mexico | | | |
| Action Item Description: | Identification Procedures, must be submitted to NMED no later then March 2, 2012 | | | |
| Action Due Date: | 3/2/2012 | | | |
| Responsible for Action: | Search <input type="text" value="Graham, Michael J"/> | | | |
| Responsible Office: | ADEP | | | |
| Distribution: | <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"> Michael Graham Charles McMillan Elizabeth Sellers Richard Marquez Paul Henry Michael Brandt </td> <td style="width: 50%; border: none;"> Deborah K. Woitte William Alexander Phoebe K. Suina Anthony R. Grieggs Tina Sandoval Scotty Jones </td> </tr> </table> | | Michael Graham Charles McMillan Elizabeth Sellers Richard Marquez Paul Henry Michael Brandt | Deborah K. Woitte William Alexander Phoebe K. Suina Anthony R. Grieggs Tina Sandoval Scotty Jones |
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EP2012-5028

February 9, 2012

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**RE: PERIODIC MONITORING REPORT FOR VAPOR-SAMPLING
ACTIVITIES AT MATERIAL DISPOSAL AREA G,
AT TECHNICAL AREA 54, FOR FISCAL YEAR 2011
LOS ALAMOS NATIONAL LABORATORY (LANL)
EPA ID #NM0890010515
HWB-LANL-12-003**

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 L.L.C.'s (LANS) (collectively, the Permittees) *Periodic Monitoring Report for Vapor-Sampling Activities at Material Disposal Area g, at Technical Area 54, for Fiscal Year 2011*, dated January 2012 and referenced by LA-UR-12-0086/EP2012-0002 (PMR). Following review of the PMR, NMED has the following comments.

Under Section 2.1, the Permittees state, “[s]amples were not collected from vapor-monitoring well 54-25105 because the sampling team inadvertently attempted to sample a different nearby borehole. The Laboratory is fairly certain that the incorrect borehole was borehole 54-24375. The field team was unable to advance the packer to the 485-ft-bgs sampling interval because they reached the total depth of the incorrect borehole at 170 ft bgs.”

The inability of the Permittees' sampling team to properly identify a vapor-monitoring well, especially after they hit TD with the packer at approximately one quarter of the TD of well 54-25105, is not an acceptable reason for not collecting the required samples. In addition, the statement that the Laboratory is "fairly certain" about the actual borehole sampled is inadequate. It is essential for NMED and all other stakeholders to be confident that the Permittees are collecting valid samples and accurately describing the actions or activities that take place in the field. The Permittees must provide documentation describing the procedures to be followed for properly identifying vapor-monitoring wells in the future. These procedures must incorporate GPS logging of the well location so that the Laboratory can verify that the correct wells are sampled.

In addition, Table D-1.0-2 indicates that vapor-monitoring well 54-25105 was not sampled in either FY2010 or FY2011. Section 2.1, FY2010 Deviations, of the FY2010 MDA G PMR (2010 PMR) states, "FY2010 sampling was not completed by September 30, 2010, the end of the sampling quarter. Borehole 54-25105 was sampled from October 5 through October 7, 2010." Table 5.0-1, Pore-Gas VOCs Detected at MDA G, Fourth Quarter FY2010 and Three Previous Quarters, of the 2010 PMR provides data for borehole 54-25105. This data must be included in Table D-1.0-2 of the PMR.

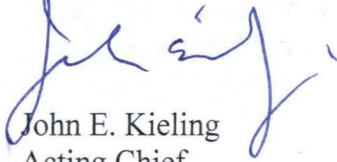
Because NMED is in the process of selecting a remedy for MDA G, it is essential that all information that will be relied upon to support the decision is defensible. The Permittees must submit either a revised version of the PMR or the appropriate replacement pages for the PMR to correct the tables regarding the borehole 54-25105. The Permittees must also provide a detailed description of the procedures for the proper identification of vapor-monitoring wells to be used prior to sampling any well at TA-54. The revised PMR or replacement pages, as well as the description of the well identification procedures, must be submitted to NMED no later than **March 9, 2012**.

The data in the PMR indicate that volatile organic compounds and tritium continue to be present in the subsurface. NMED will evaluate the need for future monitoring after a remedy is selected for MDA G.

Messrs. Rael and Graham
February 9, 2012
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Please contact Ben Wear at (505) 476-6041 should you have any questions.

Sincerely,



John E. Kieling
Acting Chief
Hazardous Waste Bureau

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File: LANL '12, MDA G

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