

**Response to Comments on the Periodic Monitoring Report for
Vapor-Sampling Activities at Material Disposal Area G, at Technical Area 54, for Fiscal Year 2011,
Los Alamos National Laboratory, EPA ID No. NM0890010515, HWB-LANL-12-003,
Dated February 9, 2012**

INTRODUCTION

To facilitate review of this response, the New Mexico Environment Department's (NMED's) comments are included verbatim. Los Alamos National Laboratory's (LANL's or the Laboratory's) responses follow each NMED comment.

COMMENTS

NMED Comment

1. *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.

LANL Response

1. The Laboratory regrets the error made in misidentifying one of the wells sampled during the field campaign. In response, the Laboratory has recently conducted global positioning system surveys of the vapor-monitoring wells at Technical Area 54 and will follow up by placing dedicated location identifiers at each well. This will eliminate the potential for misidentifying wells in the future.

NMED Comment

2. *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.*

LANL Response

2. Table D-1.0-2 (in $\mu\text{g}/\text{m}^3$) and Table D-1.0-3 (in ppbv) have been revised, and replacement pages are attached.