

**Response to the Notice of Disapproval for the Lower Mortandad/Cedro Canyons
Aggregate Area Investigation Work Plan,
Los Alamos National Laboratory EPA ID No: NM0890010515, LANL-09-069,
Dated December 10, 2009**

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.

NMED Comment

1. *The Permittees propose to collect samples in the drainages and the canyon (Section 4.2.3, Proposed Activities (for SWMU 05-004, Former Septic Tank) and Section 4.3.3, Proposed Activities (for SWMU 05-006(c), Area of Potential Contamination)). The Permittees must target areas for sample collection where there is sediment accumulation or observed staining, elevated moisture, and contaminated zones based on field screening. The Permittees must revise the Work Plan to propose to sample based on this approach for all drainage and canyon sampling activities.*

LANL Response

1. Section 5.3.3, Sediment Samples, describes the methods that will be used to identify and locate samples in drainages and canyons. As stated in this section, "The locations will be selected by the field geologist based on geomorphic relationships in areas likely to have been affected by discharges from Laboratory operations." Figures 4.1-2 and 4.3-5 of the work plan show the preliminary sediment sampling locations in the drainages. If these locations are adjusted based on field observations, the new locations will be documented as deviations from this work plan in the investigation report as discussed in section 5.3.3.

Observed staining, elevated moisture, and field-screening results are expected to be less useful in identifying sample locations than the geomorphic surveys described in section 5.3.3. As described in section 5.2, field screening will be conducted primarily for health and safety purposes. The field screening approach will be to (1) visually examine all samples for evidence of contamination, (2) screen for organic vapors, and (3) screen for radioactivity. If field screening identifies areas of contamination, samples will be collected to characterize the contamination. The following sentence has been added to section 5.2 to clarify sample selection based on field screening: "If field screening provides evidence of contamination, a sample will be collected at the contaminated interval or location."

NMED Comment

2. *The Permittees state in Section 4.0, Site Descriptions and Proposed Investigation Activities, that "analysis for dioxins and furans will be performed on 20% of the samples at a site where a former structure was destroyed by burning." The Permittees must revise the Work Plan to propose to submit all samples taken around the site of former Building 05-5 for laboratory analysis for dioxins and furans.*

LANL Response

2. The text in sections 4.0 and 4.3.3 and Table 4.0-1 have been revised to include analyses of all samples collected at the site of former building 05-5 for dioxins and furans. In addition, section 4.3.3 and Table 4.0-1 have been revised to include analysis for dioxins and furans for all samples in the drainage below the building to define lateral extent.

NMED Comment

3. *The Permittees state in Section 7.0, Schedule, that “[t]he scheduled notice date for NMED to approve this investigation work plan is January 29, 2010. Preparation of investigation activities is scheduled to start by October 1, 2010. Fieldwork is expected to start on February 24, 2011, and will take approximately 2 months to complete. Fieldwork is scheduled to be completed by April 21, 2011. The investigation report is proposed to be delivered to NMED on or before August 25, 2011. The proposed schedule seems to be longer than necessary to accomplish the proposed work. The Permittees must justify this schedule in the revised Work Plan, or provide a shorter one.*

LANL Response

3. The schedule proposed in the original work plan has been shortened by 3 months. Section 7.0, Schedule, has been revised as follows:

The scheduled notice date for NMED to approve this investigation work plan is January 29, 2010. Preparation of investigation activities is scheduled to start by October 27, 2010. Fieldwork is expected to start on December 20, 2010, and is scheduled to be completed by February 11, 2011. Laboratory analysis of samples is anticipated to be received by March 21, 2011. The investigation report is proposed to be delivered to NMED on or before June 30, 2011.