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Date: June 19, 2009
 Refer To: EP2009-0275

James P. Bearzi, Bureau Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505-6303

Subject: Submittal of the Response to the Notice of Disapproval for the Periodic Monitoring Report for Vapor-Sampling Activities at Material Disposal Area H, First Quarter Fiscal Year 2009 and Revision 1

Dear Mr. Bearzi:

Enclosed please find two hard copies with electronic files of the response to the notice of disapproval for the Periodic Monitoring Report for Vapor-Sampling Activities at Material Disposal Area H, Solid Waste Management Unit 54-004, at Technical Area 54, First Quarter Fiscal Year 2009 and Revision 1 of the report. Also enclosed is an electronic copy of a redline strikeout version of the periodic monitoring report that includes all changes made in response to the New Mexico Environment's (NMED's) notice of disapproval dated May 19, 2009. A table detailing where revisions have been made to the report with cross-references to NMED's numbered comments is also included.

If you have any questions, please contact Steve Paris at (505) 606-0915 (smparis@lanl.gov) or Ed Worth at (505) 606-0398 (eworth@doeal.gov).

Sincerely,

Michael J. Graham, Associate Director
 Environmental Programs
 Los Alamos National Laboratory

Sincerely,

David R. Gregory, Project Director
 Environmental Operations
 Los Alamos Site Office

MG/DG/DM/SP:sm

Enclosures: Two hard copies with electronic files:

- 1) Response to the Notice of Disapproval for the Periodic Monitoring Report for Vapor-Sampling Activities at Material Disposal Area H, Solid Waste Management Unit 54-004, at Technical Area 54, First Quarter Fiscal Year 2009 (LA-UR-09-3836)
- 2) Periodic Monitoring Report for Vapor-Sampling Activities at Material Disposal Area H, Solid Waste Management Unit 54-004, at Technical Area 54, First Quarter Fiscal Year 2009, Revision 1 (LA-UR-09-3829)
- 3) An electronic copy of the redline strikeout version of the plan that includes all changes and edits to the document
- 4) Cross-reference table of NMED NOD comments and revisions to the report

Cy: (w/enc.)
Neil Weber, San Ildefonso Pueblo
Ed Worth, DOE-LASO, MS A316
Steve Paris, EP-CAP, MS M992
RPF, MS M707 (with two CDs)
Public Reading Room, MS M992

Cy: (Letter and CD only)
Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-OB, White Rock, NM
Kim T. Birdsall, North Wind, Inc.
Kristine Smeltz, EP-WES, MS M992
EP-CAP File, MS M992

Cy: (w/o enc.)
Tom Skibitski, NMED-OB, Santa Fe, NM
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Michael J. Graham, ADEP, MS M991
Alison M. Dorries, EP-WES, MS M996
Dave McInroy, EP-CAP, MS M992
IRM-RMMSO, MS A150 (date-stamped letter emailed)

Cross-Reference of NMED NOD Comments and Revisions to Periodic Monitoring Report for Vapor-Sampling Activities at Material Disposal Area H, Solid Waste Management Unit 54-004, at Technical Area 54, First Quarter Fiscal Year 2009

NMED NOD Comment No.	Summary of NOD Comment Requirement	Section(s)/Page(s) in Original Report	Section(s)/Page(s) in Revised Report	Nature of Revision
General Comment				
1	NMED will not accept data for borehole location 54-15462 for the third and fourth quarters of FY2008 and the first quarter of FY2009 because the samples collected may not be representative of formation air at the depths specified.	Tables 4.0-1, 4.0-2, and 5.0-1	Tables 4.0-1, 4.0-2, and 5.0-1 Executive Summary Section 1.0, Introduction Section 6.0, Summary	Data from borehole 54-15462 that were rejected by NMED are shaded in grey. The executive summary was revised to include a statement that data from location 54-15462 were rejected. A bullet was added to section 1.0 to include a statement that data from location 54-15462 were rejected. A bullet was added to section 6.0 to include a statement that data from location 54-15462 were rejected.
Specific Comments				
1	If the data reported for the third quarter of FY2008 do not exist, the Permittees must investigate the source of the reported data, provide an explanation for the noted discrepancies, and make appropriate revisions to the monitoring report.	Section 1.0	Section 1.0, bullet 8 Section 1.0, bullet 13	The text in section 1.0, bullet 8, was revised to provide an explanation for the third quarter sampling event. A bullet was added to section 1.0 referencing the NMED letter regarding the rejected data.
2	Discrepancies between sampling intervals reported in tables and the data provided on CD must be resolved. Samples must be collected from the same depth intervals so changes in contaminant concentrations over time can be tracked meaningfully and trends identified.	Tables 1.0-1, 2.0-1, 4.0-1, 4.0-2, 5.0-1, and 5.0-2	Tables 1.0-1, 2.0-1, 4.0-1, 4.0-2, 5.0-1, and 5.0-2 Appendix B	Depth intervals have been corrected and revised to be consistent with the analytical reports provided in Appendix D. Appendix B was added to include as-built diagrams and borehole logs for locations 54-01023, 54-15461, and 54-15462.
3	Analytes not quantified in Table 5.0-1, note "b," need an explanation as to why samples were excluded during the second quarter FY2008.	Table 5.0-1	Table 5.0-1	A note was added to Table 5.0-1 to explain why the results for some analytes were not provided.