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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

August 4, 2006

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**RE: SUPPLEMENT TO NOTICE OF DISAPPROVAL FOR THE "INVESTIGATION
REPORT FOR MATERIAL DISPOSAL AREA G, CONSOLIDATED UNIT 54-
013(b)-99, AT TECHNICAL AREA 54" LOS ALAMOS NATIONAL
LABORATORY
EPA ID #NM0890010515
HWB-LANL-05-019**

Dear Messrs. Johansen and McInroy:

The New Mexico Environment Department (NMED) issued notice of disapproval (NOD) on July 26, 2006 for the document entitled *Investigation Report for Material Disposal Area G, Consolidated Unit 54-013(b)-99, at Technical Area 54* dated September 2005 and referenced by LA-UR-05-6398/ER2005-0626. After issuing the NOD, NMED received and reviewed the *Periodic Monitoring Report Vapor Sampling Activities at Technical Area 54 Material Disposal Area G for First and Second Quarters of Fiscal Year 2006* (hereafter, the Quarterly Monitoring Report) dated July 2006 and referenced by LA-UR-06-3708 and ER2006-0471. Based on the new information provided in the Quarterly Monitoring Report, NMED issues this Supplement to the Notice of Disapproval for the Investigation Report for Material Disposal Area (MDA) G, Consolidated Unit 54-013(b)-99, at Technical Area 54.

Tritium is not only a radionuclide, but also an important indicator of contaminant transport in the subsurface. In the southern portion of central MDA G (borehole 54-01111), tritium concentrations in subsurface soil pore gas increased with depth, as sh

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Messrs. Gregory and McInroy
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by the data in the Quarterly Monitoring Report. Therefore, NMED recommends that the Permittees drill one additional borehole in the vicinity of 54-01111 to determine the vertical profile of tritium concentrations in vapor phase. After initial sample collection, the boring may also be converted to a vapor monitoring well for monitoring tritium and volatile organic compounds.

Based on the new information in the Quarterly Monitoring Report, NMED generally agrees with the Permittees' plan proposed in August 1, 2006 meeting with NMED to install four additional vapor phase monitoring wells in the vicinities of BH-2, BH-10, BH-26 and BH-34. Existing boreholes may be extended to deeper zones to satisfy the determination of the extent of volatile organic compounds in the vertical direction. The Permittees must include a detailed description of installation of these new vapor phase monitoring wells in the supplemental work plan requested by NMED in the July 26, 2006 NOD. Should you have any questions or comments, please contact David Cobrain at (505) 428-2553 or Hai Shen at (505) 428-2539.

Sincerely,

James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:hs

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file: Reading and LANL TA-54 (MDA G, SWM1J 54-013(b), IRMDAG)