

**Response to the Notice of Disapproval for the Periodic Monitoring Report for Vapor Sampling
Activities at Material Disposal Area (MDA) G, at Technical Area 54, for Fiscal Year 2008,
Los Alamos National Laboratory EPA ID No: NM0890010515, HWB-LANL-08-057,
Dated April 27, 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) response follows NMED's comment.

COMMENT

NMED Comment

1. Table 5.0-1, VOCs Detected in Pore-Gas Samples Collected During Monitoring Activities at MDA G, page 59:

- a) **NMED Comment:** *The Permittees did not include the previous three quarters of volatile organic compound (VOC) and tritium data for comparison with the quarter being reported. The Permittees must include the current sampling and monitoring data plus data from the three previous monitoring events in accordance with Section XI.D.11 of the March 1, 2005 Order on Consent (Order) (see Table 5.0-1, VOC Pore-Gas Results at MDA L in the Periodic Monitoring Report, for Vapor-Sampling Activities at Material Disposal Area L, Solid Waste Management Unit 54-006, at Technical Area 54, First Quarter Fiscal year 2009).*
- b) *NMED acknowledges that the data supplied on the disc included with the Report provides the results in micro grams per cubic meter ($\mu\text{g}/\text{m}^3$) and parts per billion per volume (ppbv). To facilitate NMED's review of the Report, the Permittees must also present the results in Table 5.0-1 in both $\mu\text{g}/\text{m}^3$ and ppbv.*

LANL Response

1. Pore-gas samples for volatile organic compound (VOC) analyses and pore-vapor samples for tritium analyses are collected annually in compliance with the approved "Interim Subsurface Vapor-Monitoring Plan for Material Disposal Area G at Technical Area 54" (LANL 2007, 098608, Appendix D; NMED 2007, 098772). Tables 5.0-1 and 5.0-2 have been revised to include fiscal year 2008 (fourth quarter) results for VOC and tritium as well as for the last three sampling events. Table 5.0-1 includes results in both parts per billion per volume and micrograms per cubic meter. Replacement pages are attached to this response.

REFERENCES

LANL (Los Alamos National Laboratory), October 2007. "Corrective Measures Evaluation Plan for Material Disposal Area G at Technical Area 54, Revision 2," Los Alamos National Laboratory document LA-UR-07-6882, Los Alamos, New Mexico. (LANL 2007, 098608)

NMED (New Mexico Environment Department), October 29, 2007. "Notice of Approval, Corrective Measures Evaluation Plan for Material Disposal Area G at Technical Area 54, Revision 2," New Mexico Environment Department letter to D. Gregory (DOE-LASO) and D. McInroy (LANL) from J.P. Bearzi (NMED-HWB), Santa Fe, New Mexico. (NMED 2007, 098772)