



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

NOV 17 2009

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

Subject: Submittal of Corrected Volatile Organic Compound Information

Dear Mr. Bearzi:

The purpose of this letter is to submit corrected volatile organic compound (VOC) information as required by Permit Condition I.E.15. The Permittees have recently become aware that incorrect information was submitted in some reports required by the Permit.

A discrepancy was discovered on October 23, 2009 between a Flo Sonic underground airflow meter (flow meter) reading and the reading on a data logger attached to the flow meter. The Flo Sonic flow meter and data logger are located near the intersection of E-300 and S-1300. This discrepancy was identified during the implementation of a new procedure step to manually record airflow readings from the digital display of the Flo Sonic. The source of the problem was identified and the data logger was reprogrammed on October 28.

The Permittees have corrected the problem and have evaluated the impact of the discrepancy on data reported to the New Mexico Environment Department (NMED). Since the problem was identified, the Permittees have evaluated the extent of condition, reviewed the process, corrected the data and updated the VOC database. These activities were completed on November 12, 2009. It was determined that since November 2007 the air flow values reported by the data logger have understated the actual air flow in the E-300 drift at VOC Station A. This has resulted in reporting normalized concentrations of VOCs that are lower than actual. The error to the E-300 airflow was a proportional constant. A correction factor was therefore derived and was used in recalculating VOC concentrations.

The Permittees have corrected information for the five Notifications of Exceedances of Repository VOC Concentration of Concern for Carbon Tetrachloride reported between July 24, 2009 and October 23, 2009. The corrected information is included in Attachment 1. No other VOC Concentration of Concern has been exceeded.

The revised data indicate that since November 2007 additional exceedances of the carbon tetrachloride concentration of concern have occurred. These additional exceedances are listed on Attachment 2. These exceedances will be reported as "other noncompliances" in the October 2010 annual monitoring report per Permit Condition I.E.14, Other Noncompliances.

Corrected values are also required for VOC data in the reports listed below:

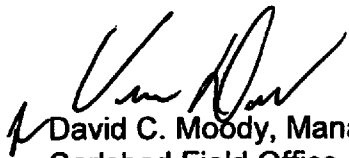
- The Semi Annual VOC Data Summary Reports submitted to the NMED on April 28, 2008, October 24, 2008, April 24, 2009 and October 23, 2009.
- The Annual Site Environmental Reports for 2007 and 2008 submitted to the NMED on September 30, 2008 and September 24, 2009 respectively.
- The VOC information submitted in the September 17 response to NMED request for VOC concentration data.

This corrected information will be provided to the NMED in the form of errata sheets as soon as the data in these reports are corrected and checked. This is expected to be completed within the next 30 days. The data indicate that at no time during this period did the running annual average for any VOC exceed the concentration of concern in Permit Table IV.F.2.c and there has been no risk to our workers, or human health or the environment offsite.

The main contribution of carbon tetrachloride appears to be from wastes in filled panels (Panels 3 and 4). Therefore, the Permittees have taken actions to reduce VOC emissions from those panels. The Permittees are currently evaluating the results of those actions and are considering other alternative actions and monitoring (e.g. surface monitoring) that we would like to discuss with you or your staff.

If you have any questions regarding this notification, please contact Mr. George Basabilvazo at (575) 234-7488.

Sincerely,


David C. Moody, Manager
Carlsbad Field Office


M. F. Sharif, General Manager
Washington TRU Solutions LLC

Enclosure(s)

cc:
S. Zappe, NMED
*ED denotes electronic distribution

Attachment 1

Date Reported to NMED	Collection Date	Analysis Date	Validation Date	Sample ID	Concentration of concern parts per billion/volume (ppbv)	Laboratory Result ppbv	Normalized Result ppbv	Background Subtraction ppbv	Normalized Concentration ppbv	Running Annual Average ppbv	Total Flow SCFM	E-300 Flow SCFM
7/24/2009	7/1/2009	7/10/2009	7/22/2009	4093	165	218.16	393.65	0	393.65	57.88	282888	156138
9/11/2009	8/18/2009	8/21/2009	9/8/2009	4211	165	139.48	310.36	0	310.36	75.36	347528	236535
9/24/2009	9/8/2009	9/14/2009	9/22/2009	4251	165	124.58	183.05	0	183.05	84.33	387901	174344
10/9/2009	9/24/2009	9/28/2009	10/7/2009	4285	165	193.2	241.48	0	241.48	90.57	435571	166529
11/2/2009	10/12/2009	10/15/2009	10/27/2009	4325	165	160.35	241.65	0	241.65	96.82	433245	199715

Attachment 2

Collection Date	Analysis Date	Validation Date	Sample ID	Concentration of Concern parts per billion/volume (ppbv)	Laboratory Result (ppbv)	Normalized Result	Background Subtraction	Difference Between VOC-A and VOC-B	Running Annual Average	Total Flow SCFM	E-300 Flow SCFM
12/22/2008	1/7/2009	1/30/2009	3665	165	130.72	186.62	0	186.62	32.38	425000	185595
12/23/2008	1/7/2009	1/30/2009	3667	165	126.85	315.06	0	315.06	35.07	260000	198785
12/29/2008	1/9/2009	2/2/2009	3675	165	97.78	220.24	0	220.24	37.13	176350	121502
12/30/2008	1/9/2009	2/2/2009	3677	165	94.9	224.93	0	224.93	38.92	176350	127855
1/6/2009	1/13/2009	1/30/2009	3687	165	137.94	207.94	0	207.94	40.89	152970	70538
4/28/2009	5/12/2009	5/27/2009	3941	165	121.76	175.13	0	175.13	48.85	357324	157208
4/29/2009	5/12/2009	5/27/2009	3965	165	136.25	190.3	0	190.3	50.49	348574	148924
6/30/2009	7/10/2009	7/22/2009	4091	165	110.27	167.19	0	167.19	54.31	408230	189337
7/7/2009	7/17/2009	8/5/2009	4099	165	101.25	167.86	0	167.86	59.33	387032	196270
7/22/2009	7/23/2009	8/11/2009	4129	165	97.36	187.12	0	187.12	65.41	380438	223655
7/29/2009	8/4/2009	9/7/2009	4151	165	94.11	166.72	0	166.72	66.97	399568	216519
8/6/2009	8/13/2009	9/7/2009	4159	165	99.98	193.07	0	193.07	69.81	393990	232731
8/10/2009	8/17/2009	9/7/2009	4183	165	95.81	185.21	0	185.21	71.29	393418	232639

Attachment 2

Collection Date	Analysis Date	Validation Date	Sample ID	Concentration of Concern parts per billion/volume (ppbv)	Laboratory Result (ppbv)	Normalized Result (ppbv)	Background Subtraction	Difference Concentration VOC-B	Running Annual Average	Total Flow SCFM	E-300 Flow SCFM
8/11/2009	8/17/2009	9/7/2009	4189	165	92.09	173.87	7.11	166.76	72.19	397775	229731
8/19/2009	8/21/2009	9/8/2009	4215	165	109.58	200.42	0	200.42	77.02	400089	223841
8/25/2009	8/28/2009	9/17/2009	4219	165	93.44	208.94	0	208.94	78.79	366482	250670
8/31/2009	9/3/2009	9/25/2009	4229	165	101.39	214.79	0	214.79	81.77	379135	245681
9/14/2009	9/18/2009	10/6/2009	4259	165	148.42	186.71	0	186.71	85.99	418421	161007
9/15/2009	9/18/2009	10/6/2009	4261	165	167.64	185.73	0	185.73	86.93	424339	143811
9/29/2009	10/2/2009	10/23/2009	4295	165	163.11	169.89	0	169.89	91.51	439924	140162
9/30/2009	10/2/2009	10/23/2009	4297	165	175.95	185.78	0	185.78	93.07	435813	140758