

General



Kulis, Jerzy, NMENV

From: Paris, Steven M <smparis@lanl.gov>
Sent: Wednesday, September 04, 2013 5:03 PM
To: Dale, Michael, NMENV
Cc: Cobrain, Dave, NMENV; Wear, Benjamin, NMENV; Dhawan, Neelam, NMENV; Kulis, Jerzy, NMENV; Yanicak, Steve; longmire@cybermesa.com; Longmire, Patrick, NMENV; Shen, Hai; Granzow, Kim; Katzman, Danny; Goering, Tim J; Lynnes, Kate; Douglass, Craig R
Subject: RE: Preliminary response to LANL's IFGMP Monitoring Year 2014, dated May 2013

Michael,

Thanks for the meeting with us to discuss NMED's preliminary comments on the 2014 IFGMP. The Laboratory appreciates NMED's statement that the comments reflect NMED's intent to balance proposed additional requirements with relief from other sampling requirements. As discussed in our August 27 meeting, the Laboratory's recommendations in the 2014 IFGMP and responses (below) to NMED's preliminary comments are based on technical judgment not budget considerations. We also believe that a monitoring program incorporating the Laboratory's responses below will be protective of the environment and will also support remedial decisions.

Stations to be omitted or excluded and reduced in sampling frequency for the IFGMP 2014 monitoring year include:

NMED Comment: Omit annual sampling at Westbay well screens R-5 S2, R-5 S3, R-5 S4, R-8 S1, R-9i S1, R-9i S2, R-19 S2, R-19 S3, R-19 S4, R-25 S5, R-25 S6, R-25 S7, R-31 S4, and R-31 S5.

LANL Response: *Continue sampling at all Westbay locations in well screens that are planned for retention, as specified in the Work Plan for the Technical Area 21 Monitoring Well Network Reconfiguration, and in the NMED's Approval with Modifications. Sampling will be conducted on a biennial basis until the Westbay sampling systems in these wells have been converted to purgeable sampling systems. Westbay well screens planned for continued sampling include R-5 S2, R-5 S3, R-8 S1, R-8 S2, and R-9i S1. Continue sampling of general surveillance Westbay wells R-19 (S2, S3, and S4) and R-31 (S4 and S5) on a biennial basis. Discontinue sampling at Westbay screens that are not planned for retention (R-5 S4 and R-9i S2). Discontinue sampling at R-25, because R-25 is planned for plugging and abandonment.*

NMED Comment: Omit semiannual sampling at Westbay well screens R-25 S1, R-25 S2, and R-25 S4;

LANL Response: *Agree.*

NMED Comment: Omit quarterly sampling at non-conforming well screens R-61 S1 and R-61 S2;

LANL Response: *Continue sampling at R-61 pending final determination that will follow from September 2013 submittal.*

NMED Comment: Omit semiannual sampling at non-conforming well R-40i; and

LAN Response: *Retain R-40i for tritium (canary) monitoring only consistent with previous agreement, but reduce monitoring frequency to an annual basis.*

NMED Comment: Reduce quarterly sampling at R-28 and R-42 to semiannual sampling.



LANL Response: *Retain R-28 and R-42 as quarterly recognizing how that schedule may be affected by pumping at those wells.*

NMED Comment: Wells R-6, R-10a, R-18, R-29, R-30, R-64, R-66, shall go from annual to semiannual sampling;

LANL Response: *Agree.*

NMED Comment: Wells R-23, R-32, R-35a, R-35b, R-44 S1, R-44 S2, R-49 S1, R-52 S1, R-53 S1, R-54 S2, and R-55 S1 shall go from semiannual to quarterly sampling; and

LANL Response: *Agree for the chromium wells (R-35a, R-35b, R-44 S1, and R-44 S2), but retain semiannual at TA-54 wells (R-23, R-32, R-49 S1, R-52 S1, R-53 S1, R-54 S2, and R-55 S1) due to the long history of non-detects at these locations.*

NMED Comment: Springs Ancho, 1, 3A, 3AA, 5, 5B, 6, 9, and 9A shall go from biennial to annual sampling.

Response: *Recommendation is for biennial monitoring at these locations due to the long history of monitoring at these springs, which shows little evidence of laboratory contaminants. However, In the event annual sampling is required at these locations we recommend the analytical suites be reduced to VOCs, HE, tritium and radionuclides biennial beginning next year.*

Let me know if I can provide any additional information concerning our responses.

Thanks,

Steve

Steve Paris
Groundwater Investigations Project Manager
Los Alamos National Laboratory
505/606-0915

From: Dale, Michael, NMENV [mailto:Michael.Dale@state.nm.us]

Sent: Thursday, July 25, 2013 1:57 PM

To: Paris, Steven M

Cc: Cobrain, Dave, NMENV; Wear, Benjamin, NMENV; Dhawan, Neelam, NMENV; Kulis, Jerzy, NMENV; Yanicak, Stephen M; longmire@cybermesa.com; Longmire, Patrick, NMENV; Shen, Hai; Granzow, Kim P

Subject: Preliminary response to LANL's IFGMP Monitoring Year 2014, dated May 2013

Steve,

New Mexico Environment Department (NMED) has expedited a preliminary review and response to the LANL document entitled "Interim Facility-Wide Groundwater Monitoring Plan for the 2014 Monitoring Year, October 2013–September 2014" (Plan), dated May 2013 and referenced by EP2013-0080. The response is based on timing issues related to the implementation of the Federal Fiscal Year 2014 (beginning October 1, 2013) site-wide groundwater monitoring at Los Alamos National Laboratory (LANL) and surrounding area. NMED's review of the Plan has prompted a response directed at omitting or dropping many of the sampling events at certain locations and congruently adding sampling events at specific locations. The following itemizes these changes to the Plan.

Stations to be omitted or excluded and reduced in sampling frequency for the IFGMP 2014 monitoring year include:

- Omit annual sampling at Westbay well screens R-5 S2, R-5 S3, R-5 S4, R-8 S 1, R-9i S1, R-9i S2, R-19 S2, R-19 S3, R-19 S4, R-25 S5, R-25 S6, R-25 S7, R-31 S4, and R-31 S5;
- Omit semiannual sampling at Westbay well screens R-25 S1, R-25 S2, and R-25 S4;
- Omit quarterly sampling at non-conforming well screens R-61 S1 and R-61 S2;
- Omit semiannual sampling at non-conforming well R-40i; and
- Reduce quarterly sampling at R-28 and R-42 to semiannual sampling.

Sampling frequency at the stations noted below shall be increased to adequately detect and monitor contaminant releases from upgradient sources and to provide added protection of groundwater resources beneath and surrounding LANL. Known contaminant releases upgradient of these monitoring stations and the presence of contamination in the subsurface/vadose zone and in regional groundwater beneath or near numerous sources justifies these additions. Specific areas of concern include: 1) Technical Areas 21-MDAs T and U, 49-MDA AB, 50-MDA C and 54-MDAs H, L, and G, 2) beneath Mortandad and Sandia canyons within and near the perimeter of the hexavalent chromium plume, 3) sentinel wells, 4) the distal end of contaminated flow paths, and 5) along the White Rock Canyon regional-aquifer discharge zone located downgradient of known liquid- and solid-waste release sites at Technical Areas 33 and 39, and Water Canyon. Stations to be added with respect to increasing sampling frequency include:

1. **Wells R-6, R-10a, R-18, R-29, R-30, R-64, R-66, shall go from annual to semiannual sampling;**
2. **Wells R-23, R-32, R-35a, R-35b, R-44 S1, R-44 S2, R-49 S1, R-52 S1, R-53 S1, R-54 S2, and R-55 S1 shall go from semiannual to quarterly sampling; and**
3. **Springs Ancho, 1, 3A, 3AA, 5, 5B, 6, 9, and 9A shall go from biennial to annual sampling.**

Please contact me if you have any questions concerning this response.

Thank you,

Michael Dale
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