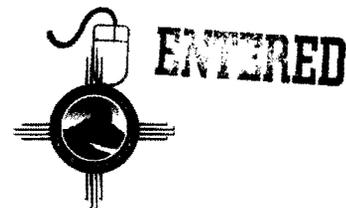




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*Date:* April 22, 2009  
*Refer To:* EP2009-0209

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 March 2009 Monthly Progress Report Corrective Measures Study for Potential Release Site 16-021(c)-99**

Dear Mr. Bearzi:

Enclosed are two hard copies with electronic files of the March 2009 Monthly Progress Report Corrective Measures Study for Potential Release Site 16-021(c)-99. The report is submitted according to the approved CMS plan for PRS 16-021(c)-99.

If you have questions, please call John McCann at (505) 665-1091 (jmccann@lanl.gov) or Woody Woodworth at (505) 665-5820 (lwoodworth@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/JM/DH:sm

Enclosures: Two hard copies with electronic files – March 2009 Monthly Progress Report  
Corrective Measures Study for Potential Release Site 16-021(c)-99  
(LA-UR-09-2192)

Cy: (w/enc.)  
Neil Weber, San Ildefonso Pueblo  
John McCann, EP-CAP, MS M992  
Woody Woodworth, DOE-LASO, MS A316  
RPF, MS M707 (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  
Jeff Heikoop, EES-6, MS D462  
Kristine Smeltz, EP-WES, MS M992  
EP-CAP File, MS M992

Cy: (w/o enc.)  
Tom Skibitski, NMED-OB, Santa Fe, NM  
Keyana DeAgüero, DOE-LASO (date-stamp copy emailed)  
Michael J. Graham, ADEP, MS M991  
Alison M. Dorries, EP-WES, MS M992  
Dave McNroy, EP-CAP, MS M992  
IRM-RMMSO, MS A150 (date-stamp copy emailed)

**Monthly Progress Report**  
**Corrective Measures Study (CMS)/Corrective Measures Implementation (CMI) for**  
**Consolidated Unit 16-021(c)-99**  
**March 2009**

This report summarizes Los Alamos National Laboratory (LANL) activities completed during March of fiscal year (FY) 2009 on the CMS/CMI for Consolidated Unit 16-021(c)-99, the TA-16-260 Outfall. Activities outlined in the CMS plan ([LA-UR-98-3918], approved by New Mexico Environment Department (NMED) - Hazardous Waste Bureau (HWB) on 9/8/99), and other related activities are described herein.

**Description of Activities and Contacts** – A tour of Cañon de Valle that included NMED representatives had been scheduled for March 27, 2009, but this had to be rescheduled for April or early May.

**Best Management Practices (BMPs)** – BMPs are inspected quarterly and following significant precipitation events. There were four precipitation events in March: one exceeded 0.5 in.; however, it did not require BMP repair in the 260 outfall area.

**CMS Hydrogeologic Investigations**– Hydrogeologic investigations include periodic water sampling as outlined in the Phase II RFI as well as continuing investigations delineated in the CMS plan. The ongoing spring sampling program, currently focused on capturing high-flow events, includes biannual sampling at Martin, SWSC, and Burning Ground Springs; these activities are now conducted under the auspices of the interim facility-wide groundwater monitoring plan.

The hydrologic system in Cañon de Valle is wet. Martin Spring is flowing at  $> 0.02$  L/sec.; Burning Ground Spring is flowing at a rate of  $\sim 0.15$  L/ sec.; SWSC Spring is flowing at  $\sim 0.05$  L/Sec.

The 90s Line Pond remained wet throughout March. Down gradient surface locations in Martin Spring Canyon and Cañon de Valle remain wet. The alluvial wells in lower Cañon de Valle and lower Martin Spring Canyon are also wet. Alluvial wells in Fishladder Canyon have wet up; well waters show high turbidity. Surface water is present in Cañon de Valle from Burning Ground spring to beyond the location of MDA-P.

**Ecological Risk Pilot**– The ecological risk pilot study has been completed and the results are presented in the Phase III RFI Report.

**CMS Bench and Pilot Studies**– Write-up of bench and pilot studies, many of which were conducted under the auspices of the Innovative Technology Remediation Demonstration (ITRD) program, have been completed. The ITRD HE program was focused on two DOE sites: LANL and Pantex. Ongoing studies, mainly consisting of monitoring in support of the previous studies, include:

1. A study of the passive barrier technology of Stormwater Management, Inc., potentially useful for removing HE and barium from waters (LANL).
2. A study of in situ anaerobic bioremediation of HE using gas-phase carbon additions (Pantex).
3. Oxidation, reduction, and in-situ bioremediation studies of groundwater contamination (Pantex).

The CMS Report from Pantex detailing these studies has been reviewed and results are incorporated in the CME report submitted to NMED on August 31, 2007.

***RFI and CMS/CME for Surface System***— The surface system CMS Report was completed and submitted to NMED on November 26, 2003; the RFI Report was completed and submitted in September of 2003. A response to the NOD on the RFI Report was submitted on January 28, 2004 and an addendum to that NOD response was submitted on February 25, 2004. An approval with modifications for the RFI was received June 23, 2004, and a response to the approval was submitted to NMED on July 23, 2004. The RFI text modifications were completed during December 2004 and submitted to NMED. An NOD on the CMS Report was received May 16, 2005. A response to that NOD was submitted on June 15, 2005.

NMED issued the “Intent to Public Notice Remedy Selection for the Solid Waste Management Unit 16-021(c)” on May 15, 2006. Public comments on this notice were due to NMED by July 14, 2006. LANL provided comments on this public notice. The remedy was approved by NMED in a letter dated October 13, 2006.

***RFI/IR and CMS/CME for Deep Groundwater***— The Investigation Report (IR) for TA-16 groundwater was completed and submitted to NMED on August 31, 2006; an approval with direction dated November 29, 2006, was received by e-mail the same day. This approval required an additional report assessing the quality of the wells in and around TA-16. Additional information, including borehole videos and X-ray diffraction data, requested in this approval was provided to NMED in a letter dated January 17, 2007.

The TA-16 Well Evaluation Report was submitted to NMED on April 30, 2007, and an NOD was received on August 17, 2007. The response to that NOD and a revised report were provided to NMED on September 30, 2007. NMED approved the Revised TA-16 Well Evaluation Report on February 11, 2008. A response to this approval was submitted on March 15, 2008. Two drilling work plans (CdV-R-15-1 and CdV-16-3(i)) were submitted as part of this approval response and were approved in an NMED letter dated March 28, 2008. An approval of the drilling work plan for the R-25b well, which was submitted in June 2007, was received in November 2007. A letter from NMED requiring completion of the CdV-16-3(i) as a regional well by July 30, 2008, was received in December. The drilling work plan for R-25(c) was submitted during February, 2008 and approved in a letter dated March 11, 2008. Drilling of R-25(c) was completed in September and the well was constructed. The well is not producing water. R-25(b) was drilled and the well was constructed in October. The well completion report for R-25(c) was submitted in September and the well completion report for R-25(b) was submitted in October 2008.

The Groundwater CME Report was submitted to NMED on August 31, 2007, and an NOD requiring submittal of a supplemental investigation work plan was received on April 22, 2008.

The supplemental investigation work plan was completed and submitted on June 30, 2008. An approval with modifications on the supplemental work plan was received on January 26, 2009.

***Corrective Measures Implementation (CMI)*** – The CMI Plan was submitted to NMED on May 10, 2007. An NOD was received on June 29, 2007; the response was submitted on July 30, 2007. NMED approved the CMI Plan in a letter dated August 17, 2007. Bench and pilot studies supporting the CMI have been re-initiated. Permitting for CMI activities was continued in March. A meeting was held to discuss 401/404, Area of Contamination determinations, ‘No Longer Contained In’, and other regulatory issues associated with the CMI. A draft ‘Area of Contamination’ request letter was drafted.

***Public and Stakeholder Involvement*** – There was no public or stakeholder involvement in March.

### **Percentage of CMS Completed**

LANL estimates 100% of both the surface CMS and the groundwater CME have been completed. This estimate does not include additional work covered by the work plan submitted on June 30, 2008.

### **Problems Encountered/Actions to Rectify Problems**

R-25(c) is not producing water; R-25(b) is still showing high turbidity. LANL will continue to monitor the well screens. Aggressive attempts to develop R-25(b) occurred in March; turbidity is decreasing (currently at 40 NTUs), but has not yet reached target levels. Water levels in R-25(c) remain below the screen.

***Key Personnel Issues*** – Randy Johnson was brought on as Subcontractor Technical Representative (STR) for the project.

### **Projected Work for April 2009**

#### ***BMPs***

- Continuing inspection of existing BMPs following significant precipitation events

#### ***CMS Hydrogeologic Investigations***

- Site maintenance at the TA-16 trailers
- Checking for presence and levels of water in Cañon de Valle alluvial system
- Precipitation monitoring
- Sampling of Cañon de Valle hydrologic system

#### ***Groundwater CME/CMI***

- Contracting for drilling of CdV-R-15-1 and CdV-16-3(i).

- Continuing attempts to develop R-25(b).

***CMS/CME Bench and Pilot Studies*** – No activities are projected for April.

***CMI***

- Contracting for CMI Implementation
- Continued lab scale tests to finalize media selection for permeable reactive barrier
- Submittal of ‘no-longer-contained in’ determination to support installation of Stormfilters and permeable reactive barrier.
- Submittal of 401/404 permit request for installation of Stormfilters and permeable reactive barrier.
- Submittal of request for Area of Contamination for CMI.
- Meetings with site personnel to expedite CMI implementation.

***Public and Stakeholder Involvement*** – A site tour for NMED personnel will be completed in late April or early May.