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LANL-16-026, MAA 2

10/19/16

**Wear, Benjamin, NMENV**

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**From:** Wear, Benjamin, NMENV  
**Sent:** Wednesday, October 19, 2016 7:40 AM  
**To:** Dhawan, Neelam; Dale, Michael, NMENV (Michael.Dale@state.nm.us)  
**Cc:** Space, Michael, NMENV (Michael.Space@state.nm.us); Kieling, John  
**Subject:** MDA L Issues

All,

Based on yesterday's meeting with LANL, I have a suggestion.

Since Kent Rich has adamantly refused to ever sample the open borehole well with the dual-packer system, he has effectively eliminated the only deep soil vapor monitoring point at MDA L. In addition, LANL made it clear in the meeting that the purpose of well 54-24399 was not for soil vapor monitoring.

The background on this well is that the only vapor sampling that was performed appropriately was when LANL utilized the dual-packer system. When using the dual-packer system, the Permittees collected samples that indicated that TCE concentrations in excess of the Tier 1 Soil Vapor Screening Levels had reached the top of the open borehole at ~566 ft bgs.

With LANL's refusal to sample the open borehole appropriately, again, there is no monitoring point to track the advancement of the VOC contamination plume towards groundwater. The only other wells that have sampling ports deeper than ~365 ft are the two angled borings that are 100 to 300 ft distant laterally and not as deep as the open borehole.

With known migrating contamination in the vadose zone encountered approximately 2/3 of the distance to groundwater and no appropriate mechanism to monitor the advance, it is my recommendation that NMED direct LANL to install a new vapor monitoring well in close proximity to well 54-24399 with multiple sampling intervals set in different layers of the vesicular basalt at depths starting approximately 565 ft bgs in order to monitor the advancement of the VOC vapor plume towards groundwater.

Please let me know if you'd like to discuss.

Thanks,

**Ben Wear**  
**Environmental Scientist**  
**Hazardous Waste Bureau**  
**New Mexico Environment Department**  
**2905 Rodeo Park Dr. East, Bldg. 1**  
**Santa Fe, NM 87505**  
**(505) 476-6041**

