

LANL '07 TA-21
DP Aggregate Area

chamberlain, kathryn, NMENV

From: Mark S. Thacker [mthacker@lanl.gov]
Sent: Tuesday, May 01, 2007 7:55 AM
To: chamberlain, kathryn, NMENV; Dhawan, Neelam, NMENV; Cobrain, Dave, NMENV
Cc: 'Allan Chaloupka'; 'Bill Criswell'; 'Day, Emily'; 'Roy Bohn'; duanep@lanl.gov; 'Woodworth, Lance A.'; 'Roy Bohn'
Subject: RE: 21-024(a) Field Screening Results

Thanks for your prompt response Katie. LANL will follow the guidance required by your e-mail in abandoning boreholes less and than or equal to 20 feet.

Mark

Mark S. Thacker
ERSS EP-TA21
(505) 665-5342
(505) 699-1963 cell
mthacker@LANL.gov

From: chamberlain, kathryn, NMENV [mailto:kathryn.chamberlain@state.nm.us]
Sent: Tuesday, May 01, 2007 7:22 AM
To: Mark S. Thacker; Dhawan, Neelam, NMENV; Cobrain, Dave, NMENV
Cc: Allan Chaloupka; Bill Criswell; Day, Emily; Roy Bohn; duanep@lanl.gov
Subject: RE: 21-024(a) Field Screening Results

Mark,

NMED has considered this approach and does not concur. In shallow holes (0-20 feet) bentonite chips must be placed in the borehole up to 2-3 feet from the ground surface. The chips must be hydrated and then 2-3 feet of concrete or clean soil must be placed on top.

Please contact me if you require further clarification.

Thank you,
Katie

From: Mark S. Thacker [mailto:mthacker@lanl.gov]
Sent: Monday, April 30, 2007 2:29 PM
To: chamberlain, kathryn, NMENV
Cc: 'Allan Chaloupka'; 'Bill Criswell'; 'Day, Emily'; 'Roy Bohn'; duanep@lanl.gov
Subject: RE: 21-024(a) Field Screening Results

Katie, I promise this will be the last clarification of the day.

Roy asked last week

"I also have a question for environmental media from the shallow auger holes up to 11 feet bgs. The ones that we talked about yesterday where we are going to use combination power auger and hand auger. Is it allowable to return the auger cuttings to the hole after we collect our samples using the hand auger as long as no elevated field screening is observed? "

NMED Responded

"NMED cannot allow you to return drill cuttings to the borehole. This has been NMED's position for some time. As stated in our Approval w/ Modifications, "[t]he Permittees may not return environmental media to the point of origin because, by doing so, the



Permittees will change the hydraulic characteristics of the unit(s) and may provide a conduit for contaminant migration."

The May 12, 2005 LANL response to the NMED approval with modification stated

"Section X.D ("Well Abandonment") of the Consent Order presents methods for abandoning wells. This section does not specifically address abandoning boreholes that have not been completed as wells. As described in Section X.D, the goal of the well abandonment is to seal the borehole in such a way that the well cannot act as a conduit for the migration of contaminants from the ground surface to the aquifer. The potential for migration of contaminants from the surface to an aquifer is much lower for shallow boreholes, such as those being installed for the DP Site investigation, than for wells in which the borehole already extends into the aquifer. Abandonment of the shallow boreholes (0-20 ft) by returning drill cuttings should achieve the borehole abandonment goals presented in Section X.D and is consistent with other routine practices, such as backfilling excavations with soil rather than grout."

LANL requests clarification

LANL had planned to backfill the shallow boreholes (0-20 ft, most 12 ft and below) with "clean" soil and the boreholes greater than 20 ft using the tremie grout method as required by the order. These shallow boreholes are in most cases directly below removed structures. If field screening detects contamination below a removed structure the contaminated soil is removed as part of the Corrective Action prior to the confirmatory sampling. LANL requests that NMED consider allowing the shallow boreholes (0-20 ft) installed as part of the DP Corrective Actions to be abandoned with a 2-foot bentonite seal at the bottom and clean fill to the surface, the drill cuttings will not be returned to the borehole. The bentonite will be placed in the bottom of the boreholes as dry bentonite chips and hydrated prior to the placement of clean fill.

We appreciate your consideration of this approach.

Mark

Mark S. Thacker
ERSS EP-TA21
(505) 665-5342
(505) 699-1963 cell
mthacker@LANL.gov

From: Roy Bohn [mailto:royb@lanl.gov]
Sent: Thursday, April 26, 2007 3:59 PM
To: 'Mark S. Thacker'; 'Duane A. Parsons'
Subject: RE: 21-024(a) Field Screening Results
Importance: High

Mark,

Let's discuss this when you get in. Maybe we can ask her if we can use clean fill as backfill for the shallow boreholes? Our SOP for monitoring well/borehole abandonment was really written for monitoring well abandonment (tremie pipe, etc).

From: chamberlain, kathryn, NMENV [mailto:kathryn.chamberlain@state.nm.us]
Sent: Thursday, April 26, 2007 12:55 PM
To: Roy Bohn
Cc: Mark S. Thacker; Duane A. Parsons; Dhawan, Neelam, NMENV
Subject: RE: 21-024(a) Field Screening Results

Roy,

In regards to the sampling location, what were the PID screening results at location 19b (b= 3570 dpm) and what were the rad screening results at location 4a (PID 1.3 ppm)? Knowing whether there were rad and PID hits at one or both 4a and 19b would be

5/1/2007

helpful. Let me know so I can get back to you on a location for the extended suite.

NMED cannot allow you to return drill cuttings to the borehole. This has been NMED's position for some time. As stated in our Approval w/ Modifications, "[t]he Permittees may not return environmental media to the point of origin because, by doing so, the Permittees will change the hydraulic characteristics of the unit(s) and may provide a conduit for contaminant migration."

Thanks,
Katie

From: Roy Bohn [mailto:royb@lanl.gov]
Sent: Thursday, April 26, 2007 10:57 AM
To: chamberlain, kathryn, NMENV
Cc: 'Mark S. Thacker'; 'Duane A. Parsons'
Subject: FW: 21-024(a) Field Screening Results

Katie,

We are determining where to take our extended suite sample at 21-024(a). The highest field screening for 21-024(a) is listed in the e-mail below. We had the highest rad screening at sample #19b (2-3 feet bgs) on the cliff bench and the highest PID at sample location #4a (0-1 foot below pipe). Do you have a preference for where the extended suite should be taken at this site?

I also have a question for environmental media from the shallow auger holes up to 11 feet bgs. The ones that we talked about yesterday where we are going to use combination power auger and hand auger. Is it allowable to return the auger cuttings to the hole after we collect our samples using the hand auger as long as no elevated field screening is observed?

Thanks!

From: AntoinetteToya [mailto:atoya@portageenv.com]
Sent: Thursday, April 26, 2007 8:56 AM
To: 'Roy Bohn'
Subject: 21-024(a) Field Screening Results

Roy,

The highest field screening results are listed below for SWMU 21-024(a):

Location 19b: a = 101dpm b = 3570 dpm

Location 4a: PID = 1.3 ppm

Let me know if you need additional information.

Thanks,
Antoinette

Antoinette E. Toya
Portage Environmental, INC.
Work: (505) 662-7600
Cell: (505) 412-9282
E-mail: atoya@portageenv.com

This inbound email has been scanned by the MessageLabs Email Security System.

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

This inbound email has been scanned by the MessageLabs Email Security System.

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

This inbound email has been scanned by the MessageLabs Email Security System.
