TA-54

Los Alamos
NATIONAL LABORATORY
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Los Alamos National Laboratory/University of California
Risk Reduction & Environmental Stewardship (RRES)
Remediation Services (RS), MS M992
Los Alamos, New Mexico 87545
(505) 667-0808/FAX (505) 665-4747

National Nuclear Security Administration
Los Alamos Site Operations, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
(505) 667-7203/FAX (505) 665-4504

Date: October 5, 2004
Refer To: ER2004-0504

Mr. John Young, Project Leader
Permits Management Program
NMED – Hazardous Waste Bureau
2905 Rodeo Park Drive East
Building 1
Santa Fe, NM 87505-6303

SUBJECT: PROPOSED INTERIM MEASURE FOR SUBSURFACE VAPOR-PHASE VOLATILE ORGANIC CHEMICAL PLUME AT MATERIAL DISPOSAL AREA L, TECHNICAL AREA (TA) 54, LOS ALAMOS NATIONAL LABORATORY (LANL)

Dear Mr. Young:

Los Alamos National Laboratory (LANL) has identified the advantage of conducting an interim measure to remediate the subsurface vapor-phase volatile organic chemical (VOC) plume at Material Disposal Area (MDA) L at Technical Area (TA)-54. We are submitting this proposal to the Hazardous Waste Bureau (HWB) for approval. The proposed interim measure would involve installation and operation of a vapor extraction system at MDA L. Operation of this system would significantly reduce the volume and boundaries of the VOC plume and prevent migration of contaminants while long-term corrective action remedies are being evaluated for this site. LANL expects the interim measure could be implemented early in FY05, whereas the final remedy for MDA L is not scheduled for completion until December 2010. Additionally, should the waste inventory in the MDA L shafts include drummed liquid VOCs, the vapor extraction system would provide a mechanism for rapidly responding to potential future releases of VOCs associated with drum failure. LANL notes that NMED's conditional approval of the MDA L investigation work plan identified contaminant releases for ongoing drum failure as a concern. The proposed interim measure would address much of this concern.

LANL proposes to prepare an interim measure plan that will evaluate the volume and rate of plume reduction based on the results of the vapor extraction tests performed in 1995 as part of the Pilot Extraction Study Plan (PESP) for Operable Unit (OU) 1148. The PESP demonstrated that control of the VOC plume is feasible through vapor extraction and accurately predicted previously measured matrix properties. The interim measure plan would be submitted to the HWB within 90 days of approval of this proposal by the HWB and would include a schedule for implementation of the measure.

The interim measure would be conducted in parallel with implementation of the MDA L investigation work plan in siting borehole locations.

We request your written approval to this proposed interim measure at MDA L. Please contact John Hopkins at 505-667-9551 or Woody Woodworth at 505-665-5820 if you have any questions.

Sincerely,

David McInroy, Deputy Project Director
Remediation Services
Los Alamos National Laboratory

Sincerely,

David Gregory, Federal Project Director
Department of Energy
Los Alamos Site Operations

DM/DG/JH/jr

Cy:
A. Dorries, RRES-ECR, MS M992
E. Rainey, RRES-ECR, MS M992
D. McInroy, RRES-RS, MS M992
B. Rich, ADO, MS A104
D. Gregory, LASO, MS A316
L. Woodworth, LASO, MS A316
J. Bearzi, NMED-HWB
J. Schoeppner, NMED-GWQB
J. Kieling, NMED-HWB
M. Leavitt, NMED-SWQB
S. Yanicak, NMED-OB
C. Voorhees, NMED-OB
L. King, EPA Region 6
RRES-RS File, MS M992
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