

From: sricpaul@gmail.com [mailto:sricpaul@gmail.com] **On Behalf Of** Paul Robinson
Sent: Thursday, February 07, 2013 11:56 AM
To: Kieling, John, NMENV
Cc: Janet; Marlene Quintana; Shean, Frederic; David McCoy
Subject: Submittal as Comment on MWL LTMMP - Summary of Recent SNL Groundwater data showing rising trends in organic pollutants in ground water and the soil column at TAG and TA-V sites

Dear John:

Attached please find a memo summarizing data from the most recent consolidated monitoring report submitted by Sandia National Laboratories to the NMED Hazardous Waste Bureau. The memo identifies significantly higher organic contaminant content in samples from the deeper locations in the vadose zone versus shallower locations below waste sites. This data has significant implications for the Long-term Monitoring and Maintenance Plan for the Mixed Waste Landfill (MWL) current under review by NMED HWB.

Though organic compounds have been detected consistently in the vadose zone below the MWL to the depth of 50 feet however Sandia has not sampled, and NMED HWB has yet to require sampling in, the vadose zone between the 50 foot depth below the surface and the water table the 450 - 500 foot depth below the surface. Detection of organic compounds below the unlined MWL is a demonstration of a release of those contaminants from the MWL. A sampling and monitoring program for organic compounds in the vadose zone between the base of the MWL and the water beneath the site is necessary to determine the extent of the releases identified in the shallower vadose zone samples at the MWL.

The gap in vadose zone monitoring between the 50 foot depth and the water table should be addressed by implementation of a sampling program to determine organic compound contamination in the vadose zone below the MWL similar in scope to the vadose zone monitoring required by NMED of Sandia National Laboratories for the Tech Area Five (TA-V) environmental remediation site.

This email summarizes the discussion in the memo and my statement during the February 6, 2013 public forum on the LTMMP conducted by the Albuquerque Bernalillo County Water Utility Authority and Water Protection Advisory Board.

Thank you for your attention to this important matter. Please don't hesitate to contact me if you or any of your colleagues have any questions or comments regarding this email and the attached memo.

Paul

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