Los Alamos
NATIONAL LABORATORY
EST. 1943
Environmental Programs
P.O. Box 1663, MS M991
Los Alamos, New Mexico 87545
(505) 606-2337/FAX (505) 665-1812



National Nuclear Security Administration
Los Alamos Site Office, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
(505) 667-4255/FAX (505) 606-2132

Date: NOV 30 2010
Refer To: EP2010-0506

James 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 Response to the Notice of Disapproval for the Corrective Measures Evaluation Report for Material Disposal Area G, Consolidated Unit 54-013(b)-99, at Technical Area 54, Revision 1, and Revision 2 of the Material Disposal Area G Corrective Measures Evaluation Report

Dear Mr. Bearzi:

Enclosed please find two hard copies with electronic files of the response to the notice of disapproval (NOD) for the Corrective Measures Evaluation Report for Material Disposal Area G, Consolidated Unit 54-013(b)-99, at Technical Area 54, Revision 1, and Revision 2 of the report.

The revised corrective measures evaluation (CME) report for Material Disposal Area (MDA) G addresses, as appropriate, comments received from the New Mexico Environment Department (NMED) for the withdrawal of the proposed remedy selection for MDA H (dated June 16, 2010) and the NOD for the CME report for MDA L (dated May 17, 2010).

In an effort to adequately address NMED's comments, a significant realignment of the report was required. Substantive changes to the format and content of the document were necessary to address the conceptual site model, identify and screen the technologies, and select and recommend an alternative. The conceptual site model (section 4) evaluates the primary source of contamination at MDA G: the pits and shafts. Emanating from the primary source is a secondary source of contamination: pore gas in the vadose zone. Remedial action objectives (section 4.7) were established to prevent human and ecological exposure to the waste material and contaminated soils and to prevent diffusion of volatile organic compounds through soil vapor from impacting groundwater.

Treatment technologies are identified in section 6 of the revised CME report. Potentially appropriate treatment technologies are grouped into four general categories: containment, in situ treatment, excavation/retrieval, and ex situ treatment. Suitable technologies based on feasibility, reliability, and the ability to satisfy remedial action objectives (within a reasonable time frame) were retained for further evaluation in section 7. Retained technologies address each of the source areas: pits and shafts and the vadose zone. In accordance with Section VII.D.4.a of the

Compliance Order on Consent (the Consent Order), these technologies were screened against the threshold criteria: to be protective of human health and the environment, to attain media cleanup standards, to control the source of releases, and to comply with applicable standards for management of waste.

Technologies that met the threshold criteria were retained for further evaluation against the remedial alternative evaluation criteria (also known as the balancing criteria) in section 8 of the report. In accordance with Section VII.D.4.b of the Consent Order, this evaluation included long-term reliability and effectiveness; reduction of toxicity, mobility, or volume; short-term effectiveness; and cost. A summary of the cost information associated with each retained technology is presented in section 8. Detailed cost estimates, assumptions, and other supporting information are presented in Appendix G.

Following evaluation of technologies for the source areas, corrective measure alternatives were developed to address the remedial action objectives. The alternatives were screened against the balancing criteria a second time to ensure the effectiveness of the recommended alternative. The recommended alternative is presented in section 9.

With the exception of Appendix A, all the appendixes in this document are new. Therefore, the appendixes are not provided in redline-strikeout format.

If you have any questions, please contact Jarrett Rice at (505) 665-3874 (wjrice@lanl.gov) or Ed Worth at (505) 606-0398 (eworth@doeal.gov).

Sincerely,

Michael J. Graham, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,

for

George J. Rael, Manager
Environmental Projects Office
Los Alamos Site Office

MG/GR/AB/JR:sm

Enclosures: Two hard copies with electronic files:
(1) Response to the Notice of Disapproval for the Corrective Measures Evaluation Report for Material Disposal Area G, Consolidated Unit 54-013(b)-99, at Technical Area 54, Revision 1 (LA-UR-10-7885)
(2) Corrective Measures Evaluation Report for Material Disposal Area G, Consolidated Unit 54-013(b)-99, at Technical Area 54, Revision 2, (LA-UR-10-7868)
(3) An electronic copy of the redline-strikeout version of the report where appropriate that includes all changes and edits to the document

Cy: (w/enc.)
Neil Weber, San Ildefonso Pueblo
Ed Worth, DOE-LASO, MS A316
Jarrett Rice, EP-TA-54 Closure Project, MS M991
RPF, MS M707 (w/ two CDs)
Public Reading Room, MS M992

Cy: (Letter and CD and/or DVD only)
Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-DOE-OB, MS M894
Shanon Goldberg, North Wind, Inc., Los Alamos, NM (w/ MS Word files on CD)
William Alexander, EP-BPS, MS M992

Cy: (w/o enc.)
Tom Skibitski, NMED-OB, Santa Fe, NM
Annette Russell, DOE-LASO (date-stamped letter emailed)
Andy Baumer, EP-TA-54 Closure Project, MS C348 (date-stamped letter emailed)
Michael J. Graham, ADEP, MS M991 (date-stamped letter emailed)