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Los Alamos Field Office, MS A316
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Los Alamos, New Mexico 87544
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Date: SEP 15 2014
Refer To: EP2014-0419

John Kieling, 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 Interim Measures Work Plan for Soil-Vapor Extraction of Volatile Organic Compounds from Material Disposal Area L, Technical Area 54, Revision 1

Dear Mr. Kieling:

Enclosed please find two hard copies with electronic files of the Interim Measures Work Plan for Soil-Vapor Extraction of Volatile Organic Compounds from Material Disposal Area L, Technical Area 54, Revision 1. The work plan was revised in response to the New Mexico Environment Department's (NMED's) approval with modifications letter received on July 17, 2014. The document was revised to directly incorporate NMED's recommendations in Comments 2 through 6. A red-line version showing the changes to the document is included with the electronic files.

Regarding NMED's Comment 1, Los Alamos National Laboratory (the Laboratory) agrees it is important to sample borehole 54-24399 and has included borehole 54-24399 in the monitoring program. However, the Laboratory does not plan to sample the borehole with the method used during fourth quarter fiscal year 2011 periodic monitoring (when a dual packer was employed to sample from 550 to 551 ft below ground surface [bgs]) because borehole 54-24399 is constructed with casing to 568 ft bgs. The borehole is open (uncased) to the Cerros del Rio basalt over an interval of 568 to 608 ft bgs. Sampling from 550 to 551 ft bgs will provide a sample from a cased interval rather than a representative sample from the basalt formation. The Laboratory proposes setting a packer within the casing near a depth of 568 ft bgs and pulling the sample from the open borehole interval. The longer interval is more appropriate for sampling the basalt (which can have very low matrix porosity and well-connected fracture porosity) because it ensures that the pore-gas sample is representative of the concentrations from the basalt formation.

Regarding NMED's Comment 4, the Laboratory priced a portable gas chromatograph with a mass spectroscopy detector and found the cost to be prohibitive. The Laboratory will use frequent SUMMA canister sampling and laboratory analysis rather than field screening to determine

subsurface VOC concentrations, as described in the work plan revision and a recommended option specified by NMED.

If you have any questions, please contact Stephani Swickley at (505) 606-1628 (sfuller@lanl.gov) or David Rhodes at (505) 665-5325 (david.rhodes@nnsa.doe.gov).

Sincerely,

for J.M.

Jeff Mousseau, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,

Peter Maggiore, Assistant Manager
Environmental Projects Office
Los Alamos Field Office

JM/PM/DM/SS:sm

Enclosures: Two hard copies with electronic files:
(1) Interim Measures Work Plan for Soil-Vapor Extraction of Volatile Organic Compounds from Material Disposal Area L, Technical Area 54, Revision 1 (LA-UR-14-26472)
(2) An electronic copy of the redline-strikeout version of the plan that includes all changes and edits to the document

Cy: (w/enc.)
David Rhodes, DOE-NA-LA, MS A316
Stephani Swickley, EP-CAP, MS M992
Public Reading Room (hard copy)
RPF (electronic copy)

Cy: (Letter and CD and/or DVD)
Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-DOE-OB, MS M894
Kay Birdsell, EP-CAP, MS M992 (w/ MS Word files on CD)
PRS Database with ER ID

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Tom Skibitski, NMED-DOE-OB (date-stamped letter emailed)
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Jeff Mousseau, ADEP (date-stamped letter emailed)