



ESHID-602241

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Date: MAR 1 6 2017 Symbol: EPC-DO: 17-050 LA-UR: 17-20362 Locates Action No.: U1501760

Ms. Michelle Hunter, Chief Ground Water Quality Bureau New Mexico Environment Department Harold Runnels Building, Room N2261 1190 St. Francis Drive P.O. Box 26110 Santa Fe, NM 87502

### Subject:Multiple Activities Work Plan for the Treatment and Land Application of<br/>Groundwater from Mortandad and Sandia Canyons, DP-1793 Work Plan #5

Dear Ms. Hunter:

On July 27, 2015, the New Mexico Environment Department (NMED) issued a Discharge Permit (DP-1793) to the U.S. Department of Energy and Los Alamos National Security, LLC (DOE/LANS) for the land application of treated groundwater from covered activities. Pursuant to Condition No. 3 of the abovereferenced discharge permit, DOE/LANS are required to submit detailed, project-specific work plans for approval by NMED before any activities are undertaken.

Chromium (Cr) concentrations exceed the New Mexico Water Quality Control Commission (NMWQCC) Regulation 3103 groundwater standard of 50  $\mu$ g/L in regional aquifer groundwater beneath Mortandad and Sandia Canyons within Los Alamos National Laboratory. The enclosed work plan is for the proposed discharge of treated groundwater from four Chromium Project activities: (1) legacy water remaining from 2016 activities, (2) water generated from 2016/2017 well installations, (3) maintenance activities at injection wells including backflush/surge water, and (4) routine monitoring well purging during sampling and five-day pumping at monitoring wells/piezometers.



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The activities listed above will be conducted as specified in the NMED-approved Interim Measures Work Plan for the Evaluation of Chromium Mass Removal, Work Plan for Chromium Plume Center Characterization and the Interim Facility-Wide Groundwater Monitoring Plan for the 2017 Monitoring Year, October 2016-September 2017. Produced groundwater will be treated and discharged in accordance with the enclosed work plan and supporting information.

Please contact William J. Foley by telephone at (505) 665-8423 or by email at <u>bfoley@lanl.gov</u> if you have questions regarding this work plan.

Sincerely,

John C. Bretzke Division Leader

Sincerely,

Cherry J. Rodrigns

Cheryl L. Rodriguez Program Manager, FPD-II

#### JCB/CLR/MTS/WJF:tav

Enclosures:

- 1) Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5
- 2) Interim Measures Work Plan for Chromium Plume Control and Work Plan for Chromium Plume Center Characterization
- 3) Topographic Map of the Project Site
- 4) Table 3.4-1 (Chromium Investigation Monitoring Group) from the Monitoring Year 2017 Interim Facility-Wide Groundwater Monitoring Plan
- 5) As-Built Specifications for CrEX-3, CrIN-1, CrIN-2, CrIN-3, CrIN-4, CrIN-5, R-15, R-61, and CrPZ-4
- 6) Water Quality Data from CrEX-1, CrEX-3, CrIN-1, CrIN-2, CrIN-3, CrIN-4, CrIN-5, R-15, R-28, R-42, R-43-S1, R-50-S1, R-61, R-62, CrPZ-1, CrPZ-2a, CrPZ-2b, CrPZ-3, CrPZ-4, and CrPZ-5
- 7) Schematic of the IX Treatment System and Technical Specifications of the IX Vessels and Resin

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**GROUND WATER** MAR 1 6 2017 BUREAU

Ms. Michelle Hunter, Chief Ground Water Quality Bureau New Mexico Environment Department Harold Runnels Building, Room N2261 1190 St. Francis Drive P.O. Box 26110 Santa Fe, NM 87502

#### Subject: Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793 Work Plan #5

Dear Ms. Hunter:

On July 27, 2015, the New Mexico Environment Department (NMED) issued a Discharge Permit (DP-1793) to the U.S. Department of Energy and Los Alamos National Security, LLC (DOE/LANS) for the land application of treated groundwater from covered activities. Pursuant to Condition No. 3 of the abovereferenced discharge permit, DOE/LANS are required to submit detailed, project-specific work plans for approval by NMED before any activities are undertaken.

Chromium (Cr) concentrations exceed the New Mexico Water Quality Control Commission (NMWQCC) Regulation 3103 groundwater standard of 50 µg/L in regional aquifer groundwater beneath Mortandad and Sandia Canyons within Los Alamos National Laboratory. The enclosed work plan is for the proposed discharge of treated groundwater from four Chromium Project activities: (1) legacy water remaining from 2016 activities, (2) water generated from 2016/2017 well installations, (3) maintenance activities at injection wells including backflush/surge water, and (4) routine monitoring well purging during sampling and five-day pumping at monitoring wells/piezometers.



Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

EPC-DO: 17-050

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## Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

**Introduction**. Chromium (Cr) concentrations exceed the New Mexico Water Quality Control Commission (NMWQCC) Regulation 3103 groundwater standard of 50 µg/L in regional aquifer groundwater beneath Mortandad and Sandia Canyons within Los Alamos National Laboratory (the Laboratory). Investigations have identified the probable chromium (VI) source as cooling-tower effluent released near the head of Sandia Canyon between 1956 and 1972. Hexavalent chromium was transported down the canyon in surface-water flow where it eventually infiltrated the vadose zone into the regional aquifer. Some chromium is present in the Sandia Canyon wetland and sediments as stable chromium(III). Hexavalent chromium is also still present in the vadose zone (including in perched-intermediate groundwater) beneath Sandia and Mortandad Canyons.

The chromium plume is approximately 1 mi by 0.5 mi in size and is estimated to be situated in the upper 75 ft of the aquifer. Several wells along the downgradient edge of the plume in the regional aquifer show increases in chromium concentrations, suggesting potential expansion of the plume. Because of these recent increases, the Laboratory is implementing plume control interim measures (IM) in accordance with Section VII.B.1 of the March 1, 2005, Compliance Order on Consent (Consent Order). The "Interim Measures Work Plan for Chromium Plume Control" (IMWP) was submitted on May 26, 2015 (Enclosure 2). The New Mexico Environment Department (NMED) approved the IMWP on October 15, 2015 (Enclosure 2). The IMWP establishes the technical foundation for the activities to control chromium plume migration in groundwater beneath Mortandad and Sandia Canyons and provides the technical information to support a proposed configuration and operational mode for extraction and injection wells.

An additional work plan, the "Work Plan for Chromium Plume Center Characterization," was submitted to NMED on July 28, 2015 (Enclosure 2). It describes activities and studies to further refine the Laboratory's assessment of potential remedial strategies for chromium in the regional aquifer and vadose zone. NMED approved the work plan on October 15, 2015. The scope is largely centered on the installation of a new extraction well located within the plume centroid and testing (pumping) to evaluate the feasibility of efficient mass removal from the centroid.

During calendar year (CY) 2016, land application under NMED-approved Discharge Permit (DP)-1793 Work Plan #3 was completed related to the above activities.

This DP-1793 Work Plan (Work Plan #5) is for the proposed CY2017 discharge of treated groundwater from four activities planned as part of the overall Chromium Project. These activities will support implementation of both the IMWP and Interim Facility-Wide Groundwater Monitoring Plan (IFGMP). These activities consist of the following:

- (1) Legacy water remaining from CY2016 activities:
  - a. Groundwater generated from extraction well CrEX-1 to assess the potential for hydraulic control of the plume in the regional aquifer;
  - b. Groundwater generated from extraction well CrEX-3 to evaluate the feasibility of efficient mass removal within the centroid of the groundwater plume;

### Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

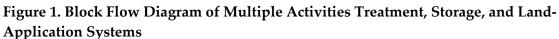
- c. Well development and aquifer testing water generated from the installation and subsequent activities at injection wells CrIN-1 through CrIN-5 and extraction well CrEX-3; and
- d. Groundwater generated from routine purging during sampling of monitoring wells under the NMED-approved 2016 Monitoring Year and 2017 Monitoring Year IFGMPs;
- (2) Water generated from well installations in 2017:
  - a. Development, aquifer testing, and extended pumping at new extraction well(s);
  - b. Development, aquifer testing, and injection capacity evaluation at new injection well(s); and
  - c. Monthly sampling at injection wells before injection at these locations;
- (3) Groundwater generated during operation and maintenance activities at extraction wells and injection wells in 2017. This consists of extraction water during periods when injection wells are not operating and backflush/surge water from the injection wells; and
- (4) Groundwater generated from routine purging during sampling of contaminant-affected monitoring wells under the NMED-approved 2017 Monitoring Year IFGMP and up to 5-d of pumping at additional piezometers/monitor wells associated with the Chromium Project.

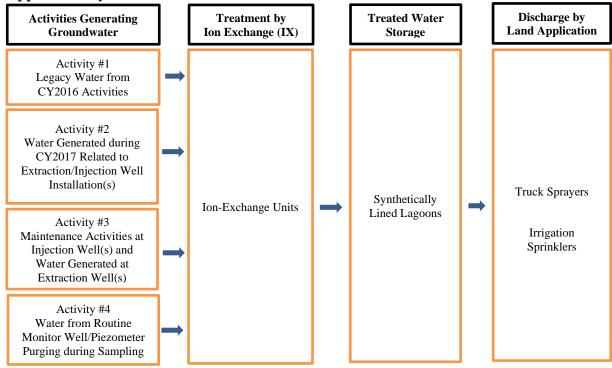
Water generated during operation of extraction wells will not be land-applied under this Work Plan, except as identified in activities (1) through (3) above. All other treated water generated during operation of extraction wells will be injected in accordance with DP-1835. Groundwater originating from the four activities in this Work Plan will be treated before land application under this Work Plan. Although generated from four different activities, because the water quality of the groundwater is similar, it will be treated and combined into the existing synthetically lined lagoons before land application.

Groundwater produced during these four activities will be treated to less than 90% of the NMWQCC groundwater standard for chromium of 50  $\mu$ g/L, stored in synthetically lined lagoons, and discharged by land application in accordance with this Work Plan and DP-1793 (July 27, 2015). Figure 1 shows the treatment, storage, and land-application flow diagram.

Volumes of water proposed for land application from the four activities planned in CY2017 are only estimates. Administrative controls will restrict the actual volume applied to less than the permitted volume of 350,000 gallons per day (gpd) total for all work plans submitted during this period under DP-1793.

# Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5





#### **Proposed Activities.**

Additional information related to the sources of water to be treated and land-applied as a result of the above activities is provided below. Table 1 provides a summary of the estimated volume of treated water to be land applied under this Work Plan.

Activity	Estimated Volume (gal.)
Activity No. 1: Legacy Water Remaining from 2016 Activities	486,700
Activity No. 2: Water Generated during CY2017 Related to Extraction/Injection Well Installation(s)	5,764,800
Activity No. 3: Maintenance Activities at Injection Well(s) and Water Generated at Extraction Well(s)	46,944,000
Activity No. 4: Water from Routine Monitor Well/Piezometer Purging during Sampling	88,400
Total	53,283,900

# Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

Activity No. 1: Legacy Water Remaining from 2016 Activities. Most of the water generated during CY2016 related to these activities was land-applied in CY2016 under DP-1793 Work Plan #3. However, some residual water remains. This water will be treated and land applied under this Work Plan during CY2017. The volume of water related to Activity No. 1 represents less than 1% of the total water proposed for land application under this Work Plan.

- Pumping at one extraction well conducted during CY2016 to test the feasibility of hydraulic control of chromium migration and to assess the potential for long-term removal of chromium from the regional aquifer and to optimize an injection strategy based on the characteristics of both the aquifer and the pumping-induced capture zone.
- Injection wells and extraction well installations were completed during CY2016. Five injections wells, CrIN-1 through CrIN-5, and one extraction well, CrEX-3, were installed, developed and tested during CY2016.
- Pumping at one extraction well was conducted during CY2016 to evaluate optimum pumping rate(s) for chromium mass removal within the centroid of the groundwater plume and to optimize an injection strategy based on the characteristics of both the aquifer and the pumping-induced capture zone.
- Monitor well/piezometer purge water in storage. Groundwater generated which is currently on-site from purging during sampling and maintenance of monitoring wells under the NMED-approved 2016 Monitoring Year and 2017 Monitoring Year IFGMP.

Activity No. 2: Water Generated during CY2017 Related to Extraction/Injection Well Installation(s). Extraction and injection wells will be installed in CY2017. In addition to these activities, additional water will be generated as a result of monthly sampling at injection wells prior to the start of injecting treated groundwater under DP-1835. Approximately 11% the water volume proposed for land application under this Work Plan is from new well installation and monthly sampling at injection wells.

Activity No. 3: Maintenance Activities at Injection Well(s) and Water Generated at Extraction

**Well(s).** During operation of the extraction/injection wells and the groundwater treatment system, periodic maintenance activities will be required. In addition, this activity also includes land application of extraction water when injection wells are down for any reason and additional extraction water which could be land applied if any delays are encountered in bringing the injection wells on-line. The volume of water produced during Activity No. 3 represents 88% of the total water proposed for land application under this Work Plan.

### Activity No. 4: Water from Routine Monitoring Well/Piezometer Purging during Sampling.

The Laboratory conducts periodic sampling from groundwater wells to monitor the nature, extent, fate and transport of contaminants in accordance with the IFGMP. Additional periodic sampling/monitoring occurs for the Chromium Project at groundwater wells and piezometers. Before a sample is collected from a groundwater monitoring well and piezometer, it is necessary to purge the well to ensure the sample collected is representative of water in the aquifer. Typically, three casing volumes are purged from a monitoring well before a sample is collected. In addition, existing piezometers will be purged continuously for up to 5 d to collect

## Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

additional data. Purge water is stored at the well site pending the availability of analytical data characterizing the quality of the water in storage. If the purge water in storage meets the requirements of the NMED-approved Decision Tree for Land Application of Groundwater (Decision Tree), then the purge water may be land-applied without treatment. Purge water with contaminant concentrations exceeding Decision Tree limits must be treated before land application or dispositioned off-site. For the wells listed in Table 2, treatment before land application may be required as identified above. The volume of water produced during Activity No. 4 represents less than 0.2% of the total water proposed for land application under this Work Plan.

Well	Source of Groundwater
R-13	Well purge water
R-15	Well purge water
R-28	Well purge water
R-42	Well purge water
R-43 S1	Well purge water
R-45 S1	Well purge water
R-45 S2	Well purge water
R-50 S1	Well purge water
R-50 S2	Well purge water
R-61	Well purge water
R-62	Well purge water
SCI-2	Well purge water
CrPZ-1	Piezometer purge water (sampling and 5-d pumping)
CrPZ-2a	Piezometer purge water (sampling and 5-d pumping)
CrPZ-2b	Piezometer purge water (sampling and 5-d pumping)
CrPZ-3	Piezometer purge water (sampling and 5-d pumping)
CrPZ-4	Piezometer purge water (sampling and 5-d pumping)
CrPZ-5	Piezometer purge water (sampling and 5-d pumping)

#### Table 2. Monitor Wells and Piezometers Included in Activity 4.

- Groundwater monitoring wells at the Laboratory are routinely sampled in accordance with the NMED-approved IFGMP. Numerous monitoring wells in the Chromium Investigation monitoring group in Sandia and Mortandad Canyons are monitored quarterly.
  - Seven of these wells—R-28, R-42, R-43, R-45, R-50, R-62, and SCI-2 and five piezometers (CrPZ-1, CrPZ-2a, CrPZ-2b, CrPZ-3, and CrPZ-5)—exhibit concentrations near or above the NMWQCC Regulation 3103 groundwater standard of 50 μg/L for chromium (total), and therefore, may require treatment before disposition via land application.

## Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

 Two of these wells—R-15 and R-61 and one piezometer—CrPZ-4 (also known as CrCH-4) —exhibit concentrations near or above the NMED Risk Assessment Guidance for Site Investigations and Remediation, Table A-1, Tap Water Soil Screening Level (Table A-1 Tap Water SSL) for perchlorate (ClO4) of 13.8 µg/L, and therefore, may require treatment before disposition via land application.

Below is additional information, common to all four of the activities identified above, for the proposed discharge.

- 1. Location. Although DP-1793 references 55 sections within the New Mexico State Plane Coordinate System at the Laboratory where treated groundwater may be discharged, the wells, piezometers, and proposed land-application sites referenced in this Work Plan are all located within the following sections:
  - (Township/Range/Section) T19N/R06E/S22, S23, S24, and S25. These four sections were selected because of their proximity to the Chromium Project sources referenced in this Work Plan.

Enclosure 3 is a topographic map of the project site including the location of all site monitoring areas (SMAs), solid waste management units (SWMUs), National Pollution Discharge Elimination System (NPDES) outfalls, groundwater discharge permits, areas of concern (AOCs) identified in the 2016 Consent Order, drinking water wells, surface impoundments, and surface drainage features in the vicinity of the Chromium Project.

2. Groundwater Monitoring. Groundwater monitoring is conducted quarterly within a group of monitoring wells contained in the Chromium Investigation monitoring group under the annual IFGMP. Annual submittal of the IFGMP is required under the Consent Order. The wells comprising the Chromium Investigation monitoring group are situated within Sandia and Mortandad Canyons. Sampling during CY2017 is being carried out in accordance with the NMED-approved IFGMP. The monitoring locations, analytical suites, and frequency of monitoring reflect the technical and regulatory status of each area and are updated annually in the IFGMP.

The Chromium Investigation monitoring group focuses on the characterization and fate and transport of chromium contamination in intermediate-perched groundwater and within the regional aquifer. The distribution of wells in the monitoring group also addresses past releases from NPDES Outfall 051, which discharges treated effluent from the Radioactive Liquid Waste Treatment Facility to the Mortandad Canyon watershed. The IFGMP excerpts for the Chromium Investigation Monitoring Group for 2017 (October 2016–September 2017) is provided as Enclosure 4. The plan lists the rationale for well selection, the applicable analytical suites, and the sampling frequency.

## Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

**3. Depth to Groundwater and Groundwater Flow Direction.** Groundwater may be present in the land-application area within alluvial, perched-intermediate, and regional aquifers.

Three alluvial groundwater monitoring wells are located in the vicinity of the landapplication sites in Mortandad Canyon: MCO-9, MCO-12, and MCA-9 (see Enclosure 3). These alluvial groundwater wells are effective first indicators of whether infiltration from land application is occurring. The direction of alluvial groundwater flow, when present, is downcanyon to the southeast.

The depth to perched-intermediate groundwater at well MCOI-5 in the vicinity of the proposed land-application sites in Mortandad Canyon is approximately 650 ft. Saturated intervals can be present above, within, and at the base of the basalts underlying the site, making determination of an overall aquifer flow direction difficult.

The depth to regional groundwater beneath the proposed land-application sites in Mortandad Canyon is approximately 1000 ft. The direction of groundwater flow in the regional aquifer beneath the proposed land-application sites is also generally to the southeast.

The Laboratory proposes to conduct monthly water-level measurements at Mortandad Canyon alluvial wells MCO-9, MCO-12, and MCA-9, both during and up to 3 mo following termination of land application.

If sufficient water is present, then a sample will be collected and analyzed for chromium, nitrate+nitrite as nitrogen (NO<sub>3</sub>+ NO<sub>2</sub>-N), total dissolved solids (TDS), chloride (Cl), and perchlorate (ClO<sub>4</sub>) by an off-site, independent National Environmental Laboratory Accreditation Program– (NELAP-) accredited analytical laboratory. The water level in a monitoring well must be within the screened interval to meet the criteria for sample collection.

In addition, NMED's approval (as modified) of Work Plan #3 placed requirements for monitoring groundwater level if continuous flows occur in the Mortandad Canyon watercourse for greater than 48 h in the proximity of the treatment areas. As part of Work Plan # 5, should a storm event cause continuous flow through the Mortandad Canyon watercourse for greater than 48 h in the proximity of the land application areas, the monthly groundwater-level measurements and associated sampling shall be scheduled as soon as is safely and operationally possible, and no more than 15 d from the cessation of flow.

**4. Well Specifications**. Enclosure 5 provides the as-built specifications for existing wells CrEX-3, CrIN-1, CrIN-2, CrIN-3, CrIN-4, CrIN-5, R-15, R-61, and CrPZ-4. As-built specifications for all other existing wells and piezometers referenced in this Work Plan, with the exception of extraction well CrEX-1, were previously supplied in DP-1793 Work Plan #3 in March 2016.

## Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

The as-built specification for CrEX-1 was previously supplied in the DP-1793 Permit Application.

**5. Expected Contaminants**. The source of groundwater generated from all activities listed in this Work Plan is the intermediate and regional aquifer. Table 3 presents maximum concentrations of contaminants from all wells proposed for land application under this Work Plan. Because the proposed extraction/injection well(s) have not yet been drilled, water quality from monitoring well R-42 and R-28, respectively, represent worst-case proxy for these well(s).

Table 3 provides the maximum concentrations of chromium, nitrate+nitrite-N, and perchlorate detected between January and November 2016 from all existing wells and piezometers listed in Activities 1 through 4. Enclosure 6 contains summary water-quality data for these wells from this period.

Chromium is the only contaminant which exceeded the NMWQCC Regulation 3103 groundwater standard at most of the wells and piezometers listed in Table 3. Nitrate+nitrite concentrations are above background levels in some wells and may become elevated even further before anionic equilibrium is reached in the IX vessel because of sorption-site flooding. In addition, NMED's May 2016 approval (as modified) of DP-1793 Work Plan #3 required perchlorate sampling of treated effluent. Perchlorate exceeded the Table A-1 Tap Water SSL in one well listed in Table 3. An analysis of other compounds in the NMWQCC Regulation 3103 groundwater standards and Table A-1, SSLs for toxics was completed. Total dissolved solids exceeded at CrEX-1 in a single, anomalous sample. All other samples from this location have been at or below 525 mg/L with an average of 238 mg/L.

Treated water monitoring conducted under this Work Plan and operational monitoring conducted by the Laboratory using Hach methods for real-time field results will closely track chromium and nitrate-N concentrations in the treated water (see item 8 below).

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## Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

 Table 3. Maximum Concentrations of Chromium, Nitrate+Nitrite, and Perchlorate in Wells and

 Piezometers, January through November 2016<sup>1</sup>.

Wells and Piezometers	Cr (µg/L)	NO3+NO2-N (mg/L)	ClO4 (µg/L)
CrEX-1	201.7	na²	0.9
CrEX-2 <sup>3</sup>	836	6.3	1.2
CrEX-3	192.4	$5.4^{4}$	1.0
CrIN-1	92.4	2.24	0.7
CrIN-2	112	4.83	0.9
CrIN-3	55.1	1.6	0.6
CrIN-4	99.9	2.67	0.7
CrIN-5	95.4	2.46	0.9
CrIN-6 <sup>5</sup>	430	4.02	1.0
R-13	8.3	0.77	0.4
R-15	15.9	2.3	10.8
R-28	430	4.02	1.0
R-42	836	6.3	1.2
R-43-S1	167	6.15	1.0
R-45-S1	42.3	3.24	0.7
R-45-S2	34.26	$0.44^{6}$	$0.3^{6}$
R-50-S1	174.7	2.72	0.7
R-50-S2	5.3	0.54	0.3
R-61	26.7	2.27	10.1
R-62	2616	1.396	$0.8^{6}$
SCI-2	385	4.12	1.0
CrPZ-1	431.2	3.787	2.176
CrPZ-2a	128.7	4.047	1.06
CrPZ-2b	118.4	1.207	1.06
CrPZ-3	351.6	4.727	1.36
CrPZ-4	14.9	4.267	63.76
CrPZ-5	258.2	2.027	1.36
NMWQCC GW Std <sup>8</sup>	50	10	<b>13.8</b> <sup>9</sup>

<sup>1</sup> Data obtained from IntellusNM for period from January 1, 2016 through November 30, 2016.

<sup>2</sup>na or not available indicates no results are available for this constituent.

<sup>3</sup>Data unavailable from this well, which has not been installed. R-42 data presented as a proxy well for CrEX-2 conditions. <sup>4</sup>Data reported is nitrate as nitrogen. Nitrate+nitrite as nitrogen data unavailable for this location.

<sup>5</sup> Data unavailable from this well, which has not been installed. R-28 data presented as a proxy well for CrIN-6 conditions. <sup>6</sup> No data available for 2016 period. Value provided based on data for period between January 1, 2011 and December 31, 2015.

<sup>7</sup>Data reported is nitrate analytical results converted to nitrate as nitrogen values. Nitrate+nitrite as nitrogen data unavailable for this location.

<sup>8</sup>NMWQCC Regulation 3103 standards for groundwater, except as noted.

9NMED Risk Assessment Guidance for Site Investigations and Remediation, Table A-1, Tap Water Soil Screening Levels.

# Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

**6. Raw Water Storage.** The type, quantity, and capacity of tanks storing untreated groundwater from all activities are listed in Table 4.

#### Table 4. Type, Quantity, and Capacity of Storage Tanks Receiving Untreated Groundwater<sup>1</sup>.

Well	Type of Storage Quantity		Tank Capacity (gal.)	
All activities listed in Table 1	21,000-gal. metal storage tank	18	~378,000	

<sup>1</sup>Water stored in poly tanks at individual well sites will be transferred to the tanks listed in Table 4 before treatment.

7. Treatment System. Groundwater, produced from activities referenced in this Work Plan that does not meet Decision Tree criteria for land application without treatment, will be treated by IX to reduce chromium concentrations to below 45 μg/L, 90% of the NMWQCC Regulation 3103 groundwater standard. In addition, groundwater produced from activities referenced in this Work Plan will be treated by IX to reduce perchlorate concentrations to below 12.4 μg/L, 90% of the Table A-1 Tap Water SSL. The project has both a centralized IX unit staged at well R-28 (CTUB) and two additional units (CTUA and CTUC) that can be used at the extraction well sites. Enclosure 7 provides a conceptual schematic of the CTUB IX treatment system and technical specifications of the IX vessels and resin. The large treatment system contains three treatment trains, and the portable unit contains two trains. Each train is composed of both a first stage and a second stage IX unit. Sample collection ports are located at all stages of treatment. The treatment system design is based on an influent chromium concentration of up to 1000 μg/L. Spare vessels will be staged on-site for replacement, as needed.

Groundwater pumped from new extraction/injection well(s) during installation, development, and testing activities will either be: (1) treated at the well site(s) and then transferred via single-wall high-density polyethylene pipeline to the synthetically lined lagoons for storage before land application or (2) transferred to the storage tanks and combined with other untreated groundwater at R-28 via truck, treated, and stored in the synthetically lined lagoons for storage before land application. Before injection operations commence at injection well(s), monthly sampling will be completed. Once injection operations commence, periodic maintenance may also be conducted at the injection well(s). Groundwater produced as a result of these activities will be transported via truck to the treatment system located at well R-28. Groundwater produced from the wells and piezometers listed in Table 3 will be transported by truck to the treatment system located at well R-28. This water will be transferred to the storage tanks and combined with other untreated groundwater prior to treatment before disposition via land application. Treated water from the four activities covered by this Work Plan will be comingled in the synthetically lined lagoons before land application.

The performance and removal efficiency of the proposed IX treatment system for chromium treatment was demonstrated previously during pumping tests and operations conducted under the following:

### Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

- NMED-issued temporary permissions in 2012, 2013, and 2014
- NMED-approved DP-1793 Work Plan #2 in 2015
- NMED-approved DP-1793 Work Plan #3 (as modified) in 2016

The IX treatment system will remove chromium to concentrations below 45  $\mu$ g/L, less than 90% of the NMWQCC groundwater standard of 50  $\mu$ g/L. Figure 2 below shows chromium concentrations in effluent (treated water) from each of the IX treatment units under DP-1793 Work Plan #3 in 2016. Effluent concentrations did not exceed 29.8  $\mu$ g/L during 2016. All results are no greater than 60% of the 50  $\mu$ g/L groundwater standard.

Figure 3 below shows nitrate+nitrite-N concentrations in effluent (treated water) from each of the IX treatment units under DP-1793 Work Plan #3 in 2016 through November. Effluent concentrations did not exceed 6.35  $\mu$ g/L during 2016, which is no greater than 65% of the 10 mg/L groundwater standard.

Figure 4 below shows perchlorate concentrations in effluent (treated water) from each of the IX treatment units under DP-1793 Work Plan #3 in 2016. Effluent concentrations did not exceed 0.96  $\mu$ g/L during 2016 through November, which is less than 10% of the 13.8  $\mu$ g/L Table A-1 SSL.

The maximum results for perchlorate in purge water from CrPZ-4 exceed the 13.8  $\mu$ g/L standard and the maximum results for R-15 and R-61 are greater than 10  $\mu$ g/L but less than the 13.8  $\mu$ g/L Table A-1 SSL. Figure 5 depicts the influent and effluent perchlorate concentrations when paired samples were obtained from IX treatment systems in 2016. Figure 6 depicts the removal efficiencies obtained for the same data. These results demonstrate the IX treatment system is achieving greater than 83% removal of perchlorate. Based on maximum result for CrPZ-4 purge water, 83% removal will meet the DP-1793 permit requirement for discharges to be less than 90% of 13.8  $\mu$ g/L. In addition, this CrPZ-4 purge water is proposed to be treated and land applied under this work plan. The mean of all sample results from CrPZ-4 is 20.2  $\mu$ g/L with a median value of 2.7  $\mu$ g/L.

The IX vessels and resins will be sampled and characterized before they are shipped back to the vendor for regeneration. It is the responsibility of the vendor to manage the vessels and resins in accordance with all applicable federal, state, and local regulations.

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Figure 2. CrEX-1, CrEX-3, and R-28 Treatment Systems' Effluent Chromium Concentrations, 2016.

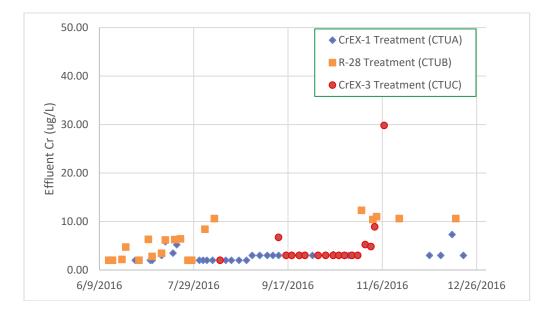
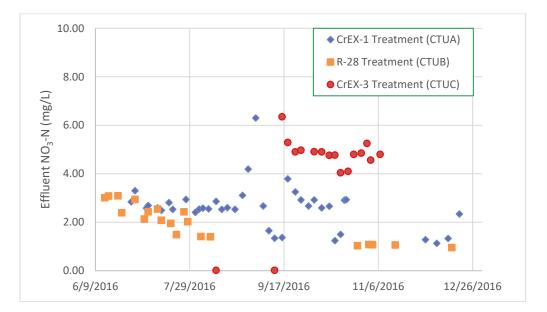
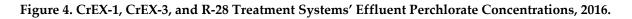
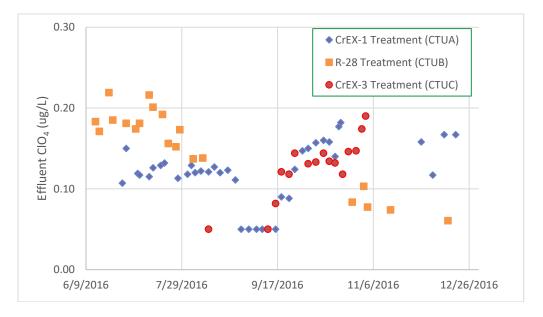


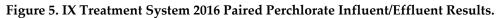
Figure 3. CrEX-1, CrEX-3, and R-28 Treatment Systems' Effluent Nitrate+Nitrite Concentrations, 2016.



### ENCLOSURE 1 Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

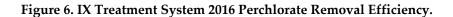


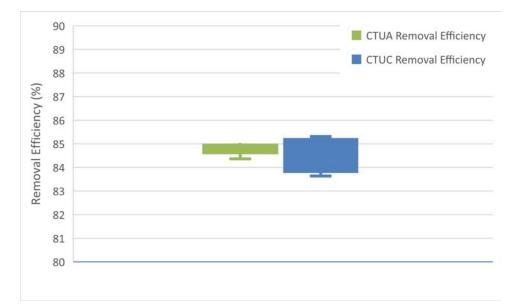






# Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5





8. Sampling Plan. To demonstrate compliance with the NMWQCC Regulation 3103 groundwater standards for chromium and nitrate+nitrite-N, grab samples will be collected routinely and throughout the entirety of land application operations from the sample port downstream of the last IX treatment vessel at each treatment site when treated groundwater will be land-applied in accordance with this Work Plan. In accordance with NMED's modified approval of Work Plan #3, perchlorate grab samples will also be collected routinely and throughout the entirety of the pumping from the sample port downstream of the last IX treatment vessel at each treatment site when treated groundwater will be land-applied in accordance with this Work Plan. These treated groundwater will be land-applied in accordance with this Work Plan. These treated water grab samples will be collected at a minimum frequency of once per week when land application operations are occurring for chromium, nitrate+nitrite-N, and perchlorate analysis by an off-site, independent NELAP-accredited analytical laboratory.

In addition, operational samples will be collected routinely and measured for chromium and nitrate-N using HACH® System, or equivalent, for real-time field results to monitor the IX treatment system performance. These treated water grab samples will be collected at a minimum frequency of two times per week when land application operations occur.

Table 5 summarizes the proposed sampling plan.

# Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

	Sample	Analytical				
Parameter	Туре	Method	TAT <sup>1</sup>	Frequency	MDL <sup>2</sup>	Laboratory
NO3+NO2-N	Grab, filtered	EPA 353.2	10 d	1 time/wk	0.033 mg/L	Off-site
Total Cr	Grab, filtered	SW-846:6020	10 d	1 time/wk	2 µg/L	NELAP- accredited
ClO <sub>4</sub>	Grab, filtered	SW-846:6850	10 d	1 time/wk	0.05 µg/L	laboratory

#### Table 5. Proposed sampling plan for treated water from all Work Plan activities.

<sup>1</sup>TAT indicates the analytical turnaround time.

<sup>2</sup>MDL indicates the method or instrument detection limit.

The following contingencies will be applied under this sampling plan.

- ✓ If chromium, perchlorate, and nitrate concentrations collected under the above sampling plan for on-site samples are less than 45 µg/L, 9 mg/L, and 12.4 µg/L, respectively, then treated groundwater will move directly from the treated water storage lagoon(s) to land application.
- ✓ If chromium or nitrate concentrations collected under the above sampling plan exceed 45 µg/L or 9 mg/L, respectively, then land application will cease immediately, and the following will be completed:
  - 1. Representative sample(s) from the lagoon(s) receiving treated water will be collected for chromium and nitrate-N analysis for on-site analysis. If the contents of the sampled lagoon(s) meet the above referenced criteria for land application they will be land applied.
  - 2. If the contents of the sampled lagoon(s) do not meet the above-referenced criteria for land application, then they will be re-treated and reanalyzed to verify concentrations meet land-application criteria.
  - 3. If chromium and nitrate-N concentrations in the effluent stream exceed the above-referenced criteria, then the upstream IX vessel will be replaced by the downstream vessel and a new downstream vessel will be installed. In addition, the IX vessel replacement process may also be conducted proactively prior to observing elevated results or to meet other operational requirements. Following this modification the effluent will be reanalyzed on-site to verify concentrations meet land-application criteria.
- ✓ If perchlorate concentrations collected under the above sampling plan for off-site samples exceed 12.4 µg/L land application will cease immediately, and the following will be completed:
  - 1. Representative sample(s) from the lagoon(s) receiving treated water will be collected for perchlorate analysis by the off-site laboratory. A duplicate sample may also be obtained for analysis by the Geochemistry and Geomaterials Research Laboratory (GGRL) operated by LANL's EES-14 group for fast turn results. If the duplicate sample is obtained these results may be used for the determination in steps 2 and 3 below.

## Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

- 2. If the contents of the sampled lagoon(s) meet the above-referenced criteria for land application, then they will be land applied.
- 3. If the contents of the sampled lagoon(s) do not meet the above-referenced criteria for land application, then they will be re-treated and reanalyzed to verify concentrations meet land-application criteria. This analysis and determination will be based on the same process as Step 1 above.
- 4. If perchlorate concentrations in the effluent stream exceed the above-referenced criteria, then the upstream IX vessel will be replaced by the downstream vessel and a new downstream vessel will be installed and the effluent. In addition, the IX vessel replacement process may also be conducted proactively prior to observing elevated results or to meet other operational requirements. Following this modification the effluent will be reanalyzed on-site to verify concentrations meet land-application criteria consistent with the process in Step 1 above.
- **9. Treated Water Storage.** Treated groundwater from all sources will be stored in the existing synthetically lined lagoons before land application. Lagoons which may be used before land application are the same ones used under DP-1793 Work Plan #3 during 2016 and previously approved by NMED Ground Water Quality Bureau (GWQB) for this use.
- 10. Land Application. Treated groundwater from all activities and sources referenced in this Work Plan will be land-applied in accordance with requirements of Discharge Permit DP-1793 (July 2015) and the conditions listed below. The following three sections— Planning, Operational Controls, and Inspections—provide additional information on the land-application component of this Work Plan.
  - Planning. Land application zones 1–4 identified in Enclosure 3 were selected and will be utilized based on the following criteria specified in Condition No. 4 of Discharge Permit DP-1793 and NMED's approval (as modified) of Work Plan #2:
    - ✓ Avoidance of watercourses, water bodies, and wetlands by observing a 20-ft nospray buffer
    - ✓ Avoidance of AOCs by observing a 20-ft no-spray buffer, with the exception of the following canyon-bottom AOCs: C-00-001 through C-00-019 and C-00-021
    - ✓ Avoidance of SWMUs and SMAs by observing a 20-ft no-spray buffer
    - ✓ Avoidance of cultural sites
    - ✓ Application on areas with average slopes <2% when groundcover is <50% and average slopes <5% when groundcover is >50%

Treated groundwater will be land-applied by (1) water trucks (3000–10,000-gal. capacity) equipped with both standard rear-mounted dust control sprayers and multiple high-pressure water sprayers, and (2) by irrigation-type sprinklers. Zones 1–3 are unpaved roads and road shoulders; zone 4 is an irrigation site. Each type of land-application zone is discussed below.

## Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

Water trucks will be filled with treated water from the synthetically lined lagoons located near the well R-28 site (see Enclosure 3). A totalizing meter will record the volume of treated water loaded into each truck.

The unpaved roads in zones 1–3 will receive water for dust suppression. The frequency and volume of treated water land-applied for dust control will be based on field conditions. The Operations Manager, or designee, will determine when an application of dust-suppression water is required.

Maintaining a low-dust environment for field personnel is an important health and safety objective for the Operations Manager. Enclosure 3 shows the location of unpaved roads.

The road shoulders in zones 1 and 3 have been identified as suitable terrain for the land application of treated water by high-pressure water sprayers. These areas meet the criteria of having >50% vegetation and have slopes that average <5% over the land-application area. Additionally, these areas are relatively flat and heavily vegetated in the strip closest to the road that will be used for spraying. When deployed by the truck driver, the high-pressure sprayer can land-apply treated water up to 100 ft from the center of the road for zone 3.

Zone 1 will be limited to land application by the high-pressure sprayers to 25 ft on either side of the center line of the road. High-visibility markings such as stakes with flagging are placed 25 ft from the road center line to identify the appropriate spray distance. The frequency and volume of land application to the road shoulders in zones 1 and 3 will be directed by the Operations Manager, or designee, based on the history of discharges to each zone and a field assessment of soil moisture. The Operations Manager objective is to achieve an equitable distribution of treated water across zones 1 and 3. Enclosure 3 shows the location of road shoulder land-application zones 1 and 3.

Zone 4 is the area approved for receiving treated water by irrigation-type sprinklers. Treated groundwater from the synthetically lined lagoons will be pumped to the irrigation sprinklers and the volume measured by a totalizing meter. Field personnel will supervise the land application and engage/disengage individual sprinklers units, as necessary. The Operations Manager, or designee, will direct the frequency of use and volume discharge to each land-application zone based on previous use and soilmoisture conditions.

Operational Controls. Condition No. 4 of Discharge Permit DP-1793 and NMED's approval (as modified) of previous Work Plans under DP-1793 establishes the following conditions for the land application of treated groundwater:

## Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

- ✓ Do not land apply water within 20 ft of watercourses or water bodies.
- ✓ Land application cannot result in water flowing from an approved landapplication site.
- ✓ Land application cannot create ponds or pools or standing water.
- ✓ Land application must be conducted in a manner that maximizes infiltration and evaporation.
- ✓ Land application is restricted to daylight hours and for a maximum of 10 h/d.
- ✓ Land application must be supervised.
- ✓ Land application cannot extend off Laboratory property without written permission from the land owner.
- ✓ Land application will be stopped if leaks in the land-application system are detected.
- ✓ Land application is prohibited while precipitation is occurring or when temperatures are below freezing.

To ensure compliance with the conditions listed above, the Laboratory will implement the following operational controls:

- a. All field personnel involved with land application will complete training to the following internal Laboratory standard operating procedure and regulatory documents:
  - ENV-RCRA-QP-010.3, Land Application of Groundwater (internal Laboratory procedure)
  - NMED-issued Discharge Permit DP-1793, LANL Groundwater Projects (July 27, 2015)
  - Multiple Activities Work Plan for the Treatment and Land Application of Groundwater From Mortandad and Sandia Canyons, DP-1793 Work Plan #5
  - NMED-GWQB Approval of DP-1793 Work Plan #5 (pending)
- b. All field personnel will participate in pre-job briefings and morning tailgate talks to provide field personnel with the following critical information: daily weather reports, daily land-application activities, system maintenance and repairs scheduled, and daily inspection schedule.
- c. Existing signs identifying the beginning and end of each land-application zone will be maintained (e.g., ZONE 1), areas where land application is permitted (green signs designating "SPRAY") and not permitted (red signs designating "NO SPRAY"). Note: high visibility markings are placed at the appropriate distance from the road to identify the usable land-application area.

## Multiple Activities Work Plan for the Treatment and Land Application of Groundwater from Mortandad and Sandia Canyons, DP-1793, Work Plan #5

- d. Field personnel will maintain written records of the volume and date of treated water land-applied to each zone.
- e. The maximum daily discharge under this and all other active work plans approved under DP-1793 will not exceed 350,000 gpd through administrative controls. Volumes will be monitored closely to ensure this volume limit is not exceeded, documented, and verified by the Operations Manager.
- Inspections. The following inspections will be conducted when land application operations are on-going to ensure compliance with the land-application criteria specified in Condition No. 4 of Discharge Permit DP-1793 and this Work Plan:
  - ✓ Daily inspection of dust-suppression sprayers, high-pressure sprayers, transfer pumps, transfer hoses, and all equipment associated with land application by water truck
  - Daily inspection of transfer pumps, transfer hoses, fittings, couplings, and all components of the irrigation sprinkler system
  - Daily inspection of the land-application zones for evidence of standing or flowing water
  - ✓ Daily inspection of the synthetically lined lagoons for minimum 2-ft freeboard
- **11. Water Conservation and Reuse Options.** In lieu of using potable water for dust suppression, treated water discharged will be land-applied to approximately 3 mi of dirt road in Mortandad Canyon (zones 1–3). Given the project's location, other reuse options—such as using treated water at Laboratory cooling towers—would require transporting the treated water by truck; the resulting environmental impact was deemed unacceptable because of the carbon dioxide emissions generated.
- **12. Project Schedule.** Land application will commence following NMED approval of this Work Plan and will continue until December 31, 2017, or when field conditions prohibit land application (see item 10 above).
- **13. Reporting.** In accordance with requirements B.8 and B.9 of Discharge Permit DP-1793 (July 27, 2015), the Laboratory will submit to NMED annual monitoring reports by March 1 of each year and a final completion report within 60 d of completing discharges under this Work Plan.

Interim Measures Work Plan for Chromium Plume Control and Work Plan for Chromium Plume Center Characterization

EPC-DO: 17-050

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# Interim Measures Work Plan for Chromium Plume Control



Prepared by the Environmental Programs Directorate

Los Alamos National Laboratory, operated by Los Alamos National Security, LLC, for the U.S. Department of Energy under Contract No. DE-AC52-06NA25396, has prepared this document pursuant to the Compliance Order on Consent, signed March 1, 2005. The Compliance Order on Consent contains requirements for the investigation and cleanup, including corrective action, of contamination at Los Alamos National Laboratory. The U.S. government has rights to use, reproduce, and distribute this document. The public may copy and use this document without charge, provided that this notice and any statement of authorship are reproduced on all copies.

EP2015-0089

### Interim Measures Work Plan for Chromium Plume Control

May 2015

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### Appendix

Appendix A Modeling Analyses

#### 1.0 INTRODUCTION

This interim measures (IM) work plan (IMWP) for plume control describes proposed activities to control chromium plume migration in groundwater at the Los Alamos National Laboratory (LANL or the Laboratory) boundary. The Laboratory proposes to conduct the IM in accordance with Section VII.B.1 of the March 1, 2005, Compliance Order on Consent (the Consent Order). The IM is proposed to control chromium migration in groundwater while long-term corrective action remedies are being evaluated. The work proposed in this IMWP follows from the "Interim Measures Work Plan for the Evaluation of Chromium Mass Removal," submitted to the New Mexico Environment Department (NMED) in April 2013 (LANL 2013, 241096). That work plan was prepared in response to requirements in a letter from NMED dated January 25, 2013 (NMED 2013, 521862), which directed that the work plan assess the potential for active long-term removal of chromium from the regional aquifer by pumping with a pilot extraction test well. This plan describes the installation and operation of extraction and injection wells to control plume migration.

Investigations and conceptual models related to chromium contamination are summarized in a number of reports, including the "Investigation Report for Sandia Canyon" (LANL 2009, 107453) and the "Phase II Investigation Report for Sandia Canyon" (LANL 2012, 228624). Additional information presented in the "Summary Report for the 2013 Chromium Groundwater Aquifer Tests at R-42, R-28, and SCI-2" (LANL 2014, 255110) and other previously unreported testing results at the new chromium extraction well CrEX-1 inform the technical recommendations in this work plan. Figure 1.0-1 shows the current extent of the chromium plume defined by the 50-ppb New Mexico groundwater standard. Figure 1.0-1 also includes time-series plots for wells R-45 and R-50, located at the downgradient portion of the plume. Chromium concentrations, but the overall trend shows a distinct overall increasing trend in chromium concentrations. These increasing trends are the reason the Laboratory is proposing the plume-control actions presented in this IMWP.

#### 2.0 OBJECTIVES

The principle objective of the IM presented in this work plan is to achieve and maintain the 50-ppb downgradient chromium plume edge within the Laboratory boundary. The activities conducted under this work plan are being proposed to expedite control of plume migration.

The measures implemented under this work plan to achieve this objective have the metric of reduction of chromium concentrations at R-50 to the 50-ppb New Mexico groundwater standard or less over a period of approximately 3 yr. The method used to achieve this objective is to pump at an existing extraction well (CrEX-1) and to inject treated water into new injection wells located primarily along the downgradient portion of the plume. A secondary objective of hydraulically controlling plume migration in the eastern downgradient portion of the plume near well R-45 is expected to be met through injection in two wells located near R-45, as discussed in sections 3.1 and 3.2 of this plan. The pumping conducted for hydraulic control will also incidentally reduce the mass of chromium within the regional aquifer, but mass removal is not specifically an objective of this IM. Another objective is to obtain additional information of the aquifer properties (i.e., aquifer heterogeneity, hydraulic connections between pumping and observation wells) in the plume area by monitoring responses to pumping conducted for plume control.

#### 3.0 APPROACH

To rapidly reduce off-site chromium transport in the regional aquifer, a pump and treat (P&T) and injection approach is proposed to achieve hydraulic control of off-site plume migration. Plume control would be implemented using a method of hydraulic capture that utilizes existing extraction well CrEX-1 and a configuration of injection wells to control migration of chromium contaminated groundwater (Figure 3.0-1). The time frame to achieve the 50-ppb New Mexico groundwater standard within the Laboratory boundary along the southern portion of the plume is modeled at less than 3 yr. Once achieved, it is anticipated that intermittent versus continual pumping will occur to maintain hydraulic control of the plume. This P&T and injection effort may be implemented intermittently but is intended to be of limited duration until a final remedy is proposed and approved by NMED. Updates to the estimations of plume response will be ongoing as data from pumping and injection are obtained.

Groundwater plumes are generally mitigated using one or a combination of three categorical approaches: monitored natural attenuation (MNA), P&T, or in situ strategies. MNA requires documentation that natural processes are occurring within the aquifer to reduce concentrations or toxicity of target contaminants. P&T can be conducted with the specific objective of achieving optimal removal of target contaminants from groundwater or to hydraulically control plume migration. In situ approaches generally involve the use of amendments directly within the aquifer either to favorably alter the geochemistry of the contaminants or to enhance naturally occurring biological processes that can favorably alter groundwater contaminants, in either case rendering them immobile or nontoxic.

All of the above-mentioned approaches other than hydraulic control, as proposed in this IMWP for plume control, would be expected to produce a much slower response at the advancing plume edge or have not yet been fully evaluated for technical feasibility in the groundwater setting beneath Mortandad Canyon. Groundwater modeling indicates that pumping to remove chromium within the plume centroid does not appreciably affect the concentration of chromium at the southern plume edge until after 10 yr or more, and thus does not meet the primary objective of this IMWP. Groundwater modeling of various scenarios shows that a combination of pumping and injection along the downgradient plume edge has a rapid effect on stabilizing the plume edge (as defined by the 50-ppb New Mexico groundwater standard) well within the Laboratory boundary in less than 3 yr of operation (Appendix A).

Disposition options, other than injection of treated groundwater via injection wells, were considered, including land application and piping and discharge of treated groundwater via an existing outfall that would release water into the same pathway that the chromium source initially followed. Relatively small volumes of treated groundwater may be land-applied in accordance with approved permits, largely for local dust suppression in the project area, but limitations on the amount of water that can be land-applied because of field logistics of distributing sufficient water on a continual basis would not result in sufficient extraction rates. Dispositioning treated water via a pipeline and existing outfall does not provide the significant benefit of rapid hydraulic control that injection wells provide and, therefore, does not support the objectives of this IMWP. However, the pipeline and outfall option for treated groundwater will likely be evaluated as a potential component of a final remedial solution to the plume.

Other, more complex approaches, including MNA and in situ strategies that may eventually be applied to address the chromium plume, are being evaluated under a separate work plan for plume-center characterization. A final evaluation of technologies, including ranking and cost benefit, will be provided in a corrective measures evaluation report for NMED.

#### 3.1 Hydraulic Capture

The goal of hydraulic capture is to create and maintain a capture zone that will arrest plume migration. An initial area of capture was determined from the 7-wk pumping period conducted at CrEX-1 in fall 2014. Appendix A presents the pressure-response data obtained from surrounding monitoring wells and provides an initial estimate of the capture zone. However, to optimize hydraulic capture of chromium-contaminated groundwater moving within the aquifer, existing extraction well CrEX-1 will operate continuously. This is consistent with the initial purpose of CrEX-1 "to evaluate further the capture zone" and "to evaluate the potential to control chromium migration towards the Laboratory boundary via hydraulic control" (LANL 2014, 254824). An initial period of pumping at CrEX-1 (a minimum of 5-6 mo) at approximately 80-100 gallons per minute (gpm) will help further establish and determine the extent, orientation, and shape of the capture zone established by pumping. The shape of the capture zone is expected to be impacted by aguifer heterogeneity. Analysis of pressure-response data from surrounding monitoring wells and piezometers will help with spatial characterization of aquifer heterogeneity and spatial propagation of the zones of hydraulic influence and hydraulic capture. All monitoring wells within the Interim Facility-Wide Groundwater Monitoring Plan's (IFGMP's) Chromium Investigation monitoring group and newly installed regional aquifer piezometers installed in corehole borings will have dedicated transducers for continuous monitoring of pressure response associated with pumping at CrEX-1 (and Los Alamos County watersupply wells).

If extended pumping at CrEX-1 and use of injection wells does not establish a capture zone sufficient to arrest plume migration, installation, and operation of an additional extraction well will be considered. The location of an additional extraction would be determined from newly obtained data. Modeled estimations of the shape of the capture zone over 1-, 3-, and 5-yr pumping durations in CrEX-1 are presented in Appendix A (Figures A-6.0-1a, b, and c).

Pumped and treated water will be land-applied in accordance with an approved discharge permit pending issuance from the NMED Groundwater Quality Bureau because no other option is currently available for its disposition. The land-application permit will limit the period of application to months when the ground is not frozen to avoid runoff of applied water. After injection wells are installed and permitted (as discussed in section 3.2), reinjection will be the primary method of disposition and will allow for continuous pumping throughout the year, unconstrained by limitations of land application. The treatment and water management approach is described in section 3.5.

#### 3.2 Injection Wells

Existing modeling analyses described in Appendix A suggest that the hydraulic capture of the contaminated groundwater at CrEX-1 will be substantially aided by siting the injection wells at the downgradient plume edge (Figure 3.0-1). Six injection wells are proposed to support plume control and provide operational flexibility during maintenance downtime. The priority injection well locations are those situated along the Laboratory boundary west and east of R-50 because of their specific role in helping to control chromium plume migration to the south (off-site). The next priority wells are those at the plume edge west of R-45 to help address what appears to be the advancement of the plume in that area, as manifested by the increasing chromium concentration at well R-45. The next priority well is the one situated at the plume edge west of R-44 to ensure the plume does not advance to the southeast in the R-44 area. A sixth injection well is currently planned in the centroid near R-42. This location was selected as a potential injection well location not only to provide an additional disposition location but also to test how injection of treated water may enhance diffusive processes between fine-grained, low-permeability zone that may contain higher concentrations of chromium and coarse-grained, high-porosity and

permeability zones that have lower chromium concentrations because of dilution from high ambient groundwater flow or because of removal by pumping.

A typical injection well design is shown in Figure 3.2-1. Injection wells will be completed with screens in the upper portion of the regional aquifer. Data from existing monitoring wells and from the recent corehole drilling campaign indicate that contamination is dominantly within the upper 50 ft of the aquifer, so injection-well screens will be targeted for that interval. Specific hydraulic performance will vary between injection wells depending on the geology encountered, but the basic assumption is that injection wells will be able to accept injection rates comparable with the rates of extraction. Because of terrain constraints and the large number of cultural sites in the project area, angled drilling may be used to achieve target locations in the aquifer. Angled drilling would utilize existing monitoring well pads. Preliminary estimates indicate that the largest angle that will be drilled is approximately 23 degrees from vertical at chromium injection well CrIN-5.

#### 3.3 Interim Measure Performance

Modeling results indicate the plume responds quickly to pumping at CrEX-1 and injection in the two injection wells west and east of R-50. The modeling analysis assumes that injection of treated water is distributed across the two injection wells at a rate equivalent to pumping at CrEX-1. Pumping at CrEx-1 in fall 2014 indicated the maximum sustainable pumping rate is approximately 80–100 gpm.

Figure 3.3-1 shows projections of the plume over 1-yr, 3-yr, and 5-yr time frames. The operational approach used for the model assumes that CrEX-1 is pumping at 80 gpm and injection is occurring at approximately 40 gpm in each of the wells west and east of R-50. The model indicates the plume edge will be well within the Laboratory boundary by the second year of full operation. Currently, existing downgradient portions of the plume not captured by pumping at CrEX-1 will continue to migrate but at concentrations increasingly below the 50-ppb New Mexico groundwater standard. Injection wells along the eastern portion of the plume, especially near R-45, are also expected to limit plume expansion to the east (Figure A-8.0-3 in Appendix A). Some uncertainty exists in the potential influence of injection on groundwater flow direction in that portion of the plume, but dilution of plume concentrations in that area as a result of injection would likely also result in decreases in chromium concentrations along that potential flow path. There are some uncertainties specifically with respect to how quickly the plume will respond to pumping because the model and the projections shown in Figure 3.3-1 do not yet represent the role that dual porosity may play with respect to the distribution of chromium within the aquifer. Seven weeks of pumping in CrEX-1 in fall 2014 showed steady concentrations of chromium, possibly indicating that chromium is primarily within coarse, permeable strata in this portion of the plume. Additional pumping at CrEX-1 will improve the understanding of whether dual porosity plays a role in the distribution of chromium in the aquifer in the CrEX-1 area.

Once downgradient plume control is achieved, it is anticipated that operations will become intermittent for operational efficiency but in a manner that still maintains plume control. It is anticipated that hydraulic control measures will continue until a final remedy is approved and implementation is underway.

#### 3.4 Performance Monitoring

Existing monitoring wells within the Chromium Investigation monitoring group under the IFGMP (Figure 1.0-1) will continue to be sampled in accordance with the current approved IFGMP (LANL 2014, 256728). However, key wells for monitoring performance of the IM are R-50, screens 1 and 2; R-44, screens 1 and 2; and R-45, screens 1 and 2. These wells are situated along the downgradient edge of the plume and, therefore, are well suited for monitoring performance of the hydraulic containment strategy.

Although somewhat variable, the overall trend in chromium concentrations in R-45 and R-50 over the past few years has been increasing within the upper screens. The chromium concentration in these wells is expected to decline in response to the pumping and injection approach described here. Well R-44 is currently showing low and stable chromium concentrations that should remain the same or decline in response to pumping and injection. Figure A-8.0-4 in Appendix A shows estimations of the trend of chromium concentrations at R-50, screen 1, and R-45, screen 1, in response to pumping and injection. New piezometers installed in coreholes drilled in 2014 and 2015 within the plume area will be used along with existing monitoring wells to continuously monitor pressure responses associated with pumping and injection and may also be monitored periodically for changes in water quality.

#### 3.5 Groundwater Treatment and Disposition

The treatment system will consist of extraction well CrEX-1 (and a possible additional extraction well), a treatment system, a spray irrigation system for potential land application, and ultimately up to six injection wells. Once fully operational, the system will run continuously with pumped groundwater being treated at the surface and delivered to injection wells via piping. The treatment unit is likely to be sited at the CrEX-1 location to minimize the distance that contaminated groundwater is conveyed before pumping begins. Two treatment trains, each consisting of two ion-exchange vessels, will operate in series to treat groundwater extracted from CrEX-1. The first vessel removes up to 99% of the chromium (and nitrate), and the second vessel is used for redundancy and polishing. A third treatment train is held in reserve as a spare. Water quality in the treatment stream will be monitored in accordance with an NMED-approved discharge permit to ensure that water land-applied or dispositioned via reinjection will meet the criteria set forth in the permit(s). When the injection wells are operational, a computer-control system will be in place to monitor and control flow rates, pressures, water levels, and injection rates into the wells to ensure the systems are operating as designed. Flow rate of injected water will be monitored, and pressure at each injection well will be maintained at a design level. Water levels in all injection wells will be monitored by a control system with system shutdown mechanisms in places. Each injection well will also be equipped with a submersible pump to allow each well to be periodically back-flushed for maintenance. The approved discharge permit will include contingencies for failures in any part of the treatment and discharge system.

#### 4.0 SCHEDULE

Implementation of the IMWP scope currently depends on the Laboratory's receiving approval from NMED for the land application of treated water pumped from CrEX-1. It is currently anticipated that a discharge permit will be in place for land application sometime in June 2015 to allow the Laboratory to begin pumping at CrEX-1. Under that scenario, pumping could be conducted continuously from approximately July to approximately November 2015, at which time pumping and land application will terminate because the permit will not allow land application on frozen ground. Additional restrictions on initial operations at CrEX-1 are the limits established for allowed days of pumping remain on the existing OSE permit. Additionally, existing National Environmental Policy Act (NEPA) coverage provides for an additional 13 million gallons of pumping. Extending operation of CrEX-1 past these limits requires completion of the Environmental Assessment process under the NEPA, an OSE permit for change in point of diversion, and a discharge permit for land application of treated water. The process involved for all of these permits is underway.

Drilling and construction of injection wells is expected to begin in fall 2015. The goal is to have the pumping, treatment, and injection infrastructure in place for operation in 2016; however, operation of the

injection wells depends upon receiving the discharge permit for injection wells, the application for which was submitted April 2015. Once the system is fully operational, pumping and injection will operate continuously while monitoring is conducted by the Laboratory to determine whether hydraulic capture meets the objective of achieving and maintaining the plume edge within the Laboratory boundary.

If the goal is met, an updated extraction and injection operational program to maintain hydraulic control will be implemented. The updated strategy will consider opportunities to minimize groundwater extraction while still controlling the migration of chromium.

#### 5.0 MANAGEMENT OF INVESTIGATION-DERIVED WASTE

Investigation-derived waste will be managed in accordance with EP-DIR-SOP-10021, Characterization and Management of Environmental Programs Waste. This standard operating procedure incorporates the requirements of applicable U.S. Environmental Protection Agency and NMED regulations, U.S. Department of Energy orders, and Laboratory requirements. The primary waste streams include development water, drill cuttings, drilling fluid, decontamination fluids, and contact waste.

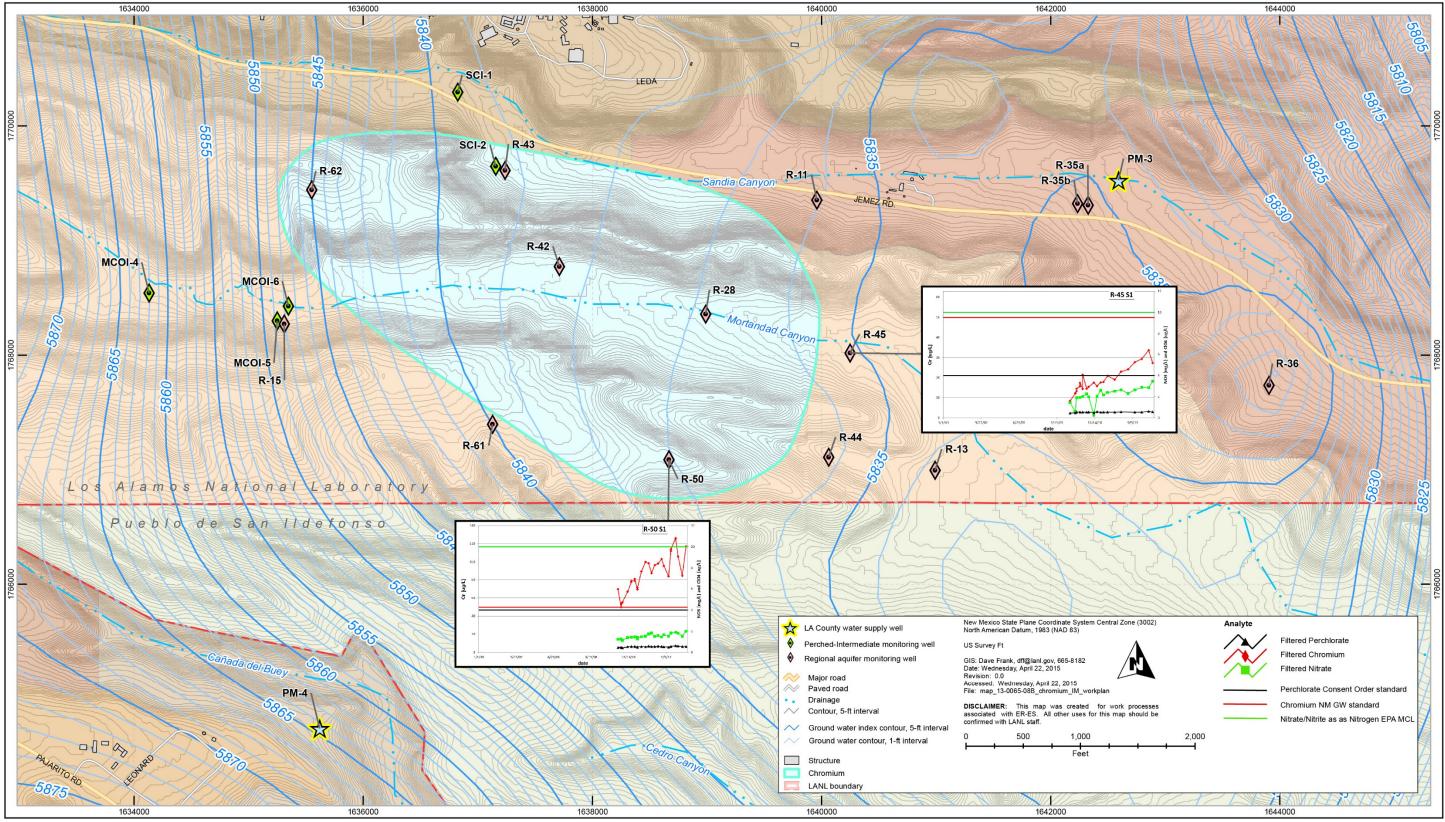
#### 6.0 REFERENCES

The following list includes all documents cited in this plan. Parenthetical information following each reference provides the author(s), publication date, and ER ID or ESH ID. This information is also included in text citations. ER IDs were assigned by the Environmental Programs Directorate's Records Processing Facility (IDs through 599999), and ESH IDs are assigned by the Environment, Safety, and Health (ESH) Directorate (IDs 600000 and above). IDs are used to locate documents in the Laboratory's Electronic Document Management System and, where applicable, in the master reference set.

Copies of the master reference set are maintained at the NMED Hazardous Waste Bureau and the ESH Directorate. The set was developed to ensure that the administrative authority has all material needed to review this document, and it is updated with every document submitted to the administrative authority. Documents previously submitted to the administrative authority are not included.

- LANL (Los Alamos National Laboratory), October 2009. "Investigation Report for Sandia Canyon," Los Alamos National Laboratory document LA-UR-09-6450, Los Alamos, New Mexico. (LANL 2009, 107453)
- LANL (Los Alamos National Laboratory), September 2012. "Phase II Investigation Report for Sandia Canyon," Los Alamos National Laboratory document LA-UR-12-24593, Los Alamos, New Mexico. (LANL 2012, 228624)
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- LANL (Los Alamos National Laboratory), March 2014. "Drilling Work Plan for Groundwater Extraction Well CrEX-1," Los Alamos National Laboratory document LA-UR-14-21478, Los Alamos, New Mexico. (LANL 2014, 254824)

- LANL (Los Alamos National Laboratory), May 2014. "Interim Facility-Wide Groundwater Monitoring Plan for the 2015 Monitoring Year, October 2014–September 2015," Los Alamos National Laboratory document LA-UR-14-23327, Los Alamos, New Mexico. (LANL 2014, 256728)
- NMED (New Mexico Environment Department), January 25, 2013. "Response, Proposal to Submit Interim Measures Work Plan for Chromium Contamination in Groundwater," New Mexico Environment Department letter to P. Maggiore (DOE-LASO) and J.D. Mousseau (LANL) from J.E. Kieling (NMED-HWB), Santa Fe, New Mexico. (NMED 2013, 521862)



Notes: Shaded area represents the approximate plume edge at the 50-ppb level for chromium. The two time-series plots show increasing chromium concentrations at the downgradient portion of the plume.

Figure 1.0-1 Extent of chromium contamination in groundwater

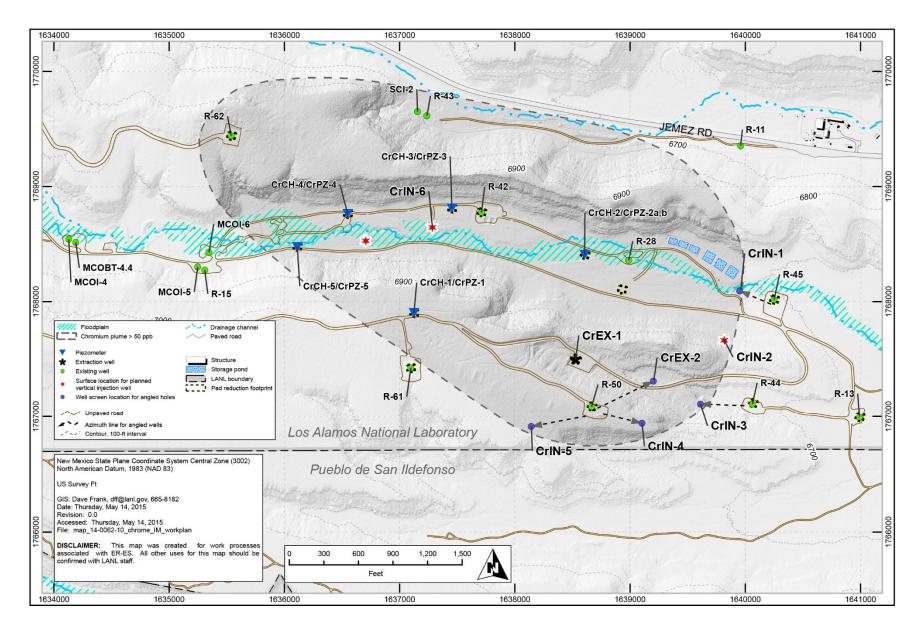


Figure 3.0-1 Location of the existing extraction well for hydraulic control and proposed locations for injection wells

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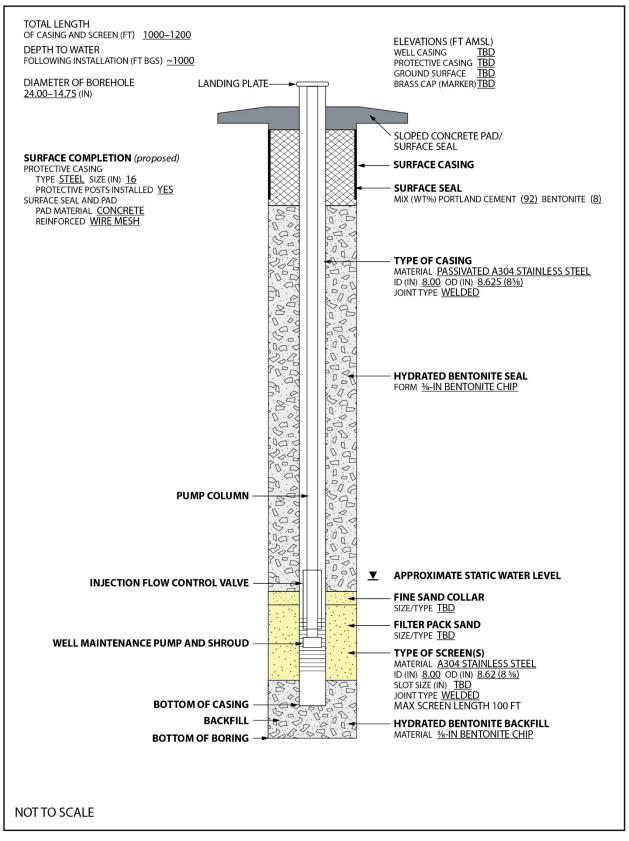
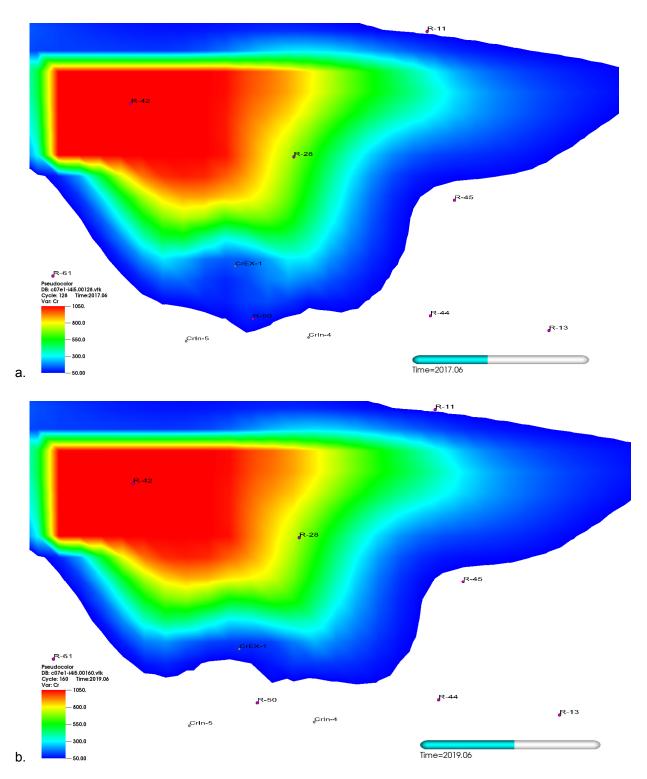
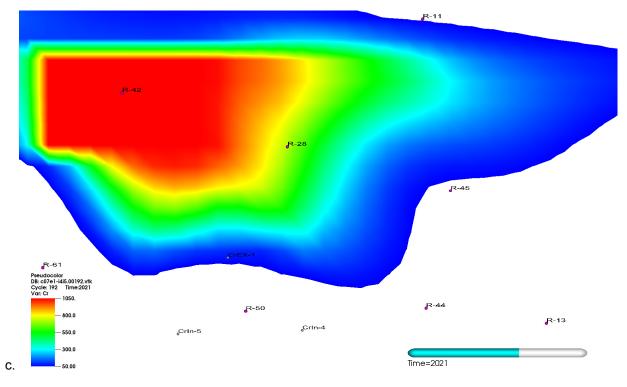


Figure 3.2-1 Generalized injection well design



Note: The modeled scenarios assume pumping at CrEX-1 at 80 gpm and injection in CrIN-1 and CrIN-2 at 40 gpm each.

#### Figure 3.3-1 Snapshot estimations of the extent of chromium at the 50-ppb level for (a) 1-yr, (b) 3-yr, and (c) 5-yr time frames after initiation of pumping and injection



Note: The modeled scenarios assume pumping at CrEX-1 at 80 gpm and injection in CrIN-1 and CrIN-2 at 40 gpm each.

Figure 3.3-1 (continued) Snapshot estimations of the extent of chromium at the 50-ppb level for (a) 1-yr, (b) 3-yr, and (c) 5-yr time frames after initiation of pumping and injection

ENCLOSURE 2

# Appendix A

Modeling Analyses

#### ENCLOSURE 2

# A-1.0 INTRODUCTION

This appendix provides a detailed analysis of the hydraulic pressure data collected during the pumping test conducted at regional chromium extraction well CrEX-1 by Los Alamos National Laboratory (LANL or the Laboratory). Preliminary analyses were presented in the "Completion Report for Chromium Extraction Well 1" (hereafter, the CrEX-1 Completion Report) (LANL 2015, 600170). The appendix also provides a modeling analysis of potential capture zones (CZs) and plume responses under different pumping regimes and injection scenarios.

# A-2.0 HYDROGEOLOGY

CrEX-1 was installed initially to test the concept of hydraulic capture of chromium-contaminated groundwater to arrest plume migration at the southern downgradient edge of the plume. The CrEX-1 borehole was drilled using fluid-assisted dual-rotary drilling methods and mud-rotary methods. Drilling fluid additives included potable water, a foaming agent and benonite-based drilling mud. The CrEX-1 screened intervals consist of a 50.0-ft screen from 990 to 1040 ft below ground surface (bgs) and a 20-ft-long screen from 1070 ft to 1090 ft bgs that is isolated from the upper screen with a packer. A 30-ft section of blank casing separates the two screens. CrEX-1 is completed in the Puye Formation ([Tpf] 809 ft to 1054 ft bgs); mixed Miocene deposits ([Tjpf and Tcar] 1054 ft to 1070 bgs); and Miocene pumiceous sediments ([Tjfp] 1070 ft to 1155 ft bgs). Since only the upper 50-ft screen was pumped, the aquifer test provides information about the properties of Puye Formation. Aquifer testing indicated CrEX-1 will perform effectively and will be capable of sustained pumping at approximately 80–100 gallons per minute (gpm) (LANL 2015, 600170).

On October 3, 2014, following well installation, well development, installation of the packer between the upper and lower screens, and aquifer testing, the depth to water was 997.2 ft bgs. The upper screen of CrEX-1 straddles the regional water table. This allows for effective interrogation of the upper most portion of the regional aquifer next to the regional water table where the highest contaminant concentrations are expected. As a result, the effective screen length is about 43 ft (from the water table to the bottom of the upper screen which is at 1040 ft bgs).

The pumping of CrEX-1 produces a maximum drawdown of about 6.2 m (~20 ft) within the pumped upper screen at a pumping rate of approximately 80 gpm. However, the well-specific capacity does not decline with the increase of the pumping rate (and the respective increase of the pumping drawdown; see below). This suggests that borehole skin effects cause a portion of the drawdown; as a result, the drawdown in the aquifer near the well is expected to be much lower than the one observed within the pumped borehole. Nevertheless, the pumping causes a decline in the regional water table, and it is expected that residual vadose-zone groundwater flow from the capillary fringe may impact the drawdowns observed in CrEx-1. Therefore, unconfined (phreatic) groundwater flow is occurring near the pumped well. However, the observed drawdowns are still small compared with the aquifer thickness (>100 ft), and therefore it is acceptable to use analytical solutions and numerical models that interpret the flow as confined.

Based upon the depth to water of 997.2 ft bgs measured at CrEX-1 on October 3, 2014, after installation, initial development and aquifer testing, the water-level elevation was approximately 5834.73 ft above mean sea level ([amsl] the top of well casing is at elevation 6831.91 ft and the water level in the well is 997.2 bgs).

# A-3.0 CrEX-1 PUMPING TEST DATA

CrEX-1 was tested from October 1 to 4, 2014. Testing consisted of a five-step pumping test on October 1, and a 24-h constant-rate pumping test that was begun on October 3. The pumping rates during the five-step test and the 24-h pumping test were relatively steady. The water level declines and rebounds very fast in response to pumping. The initial recovery of water levels to elevations higher than the equilibrated static level during rebound when pumping stops could indicate groundwater recharge from the vadose zone, but there may be other explanations such as elastic deformations in the porous media. The water level also recovers relatively fast to the prepumping conditions after pumping stops, suggesting the aquifer at CrEX-1 has relatively high hydraulic conductivity and that borehole skin effects may be impacting the observed drawdowns within the pumping well. The aquifer testing was performed in the upper screen only. A 50-horsepower, 6-in.-diameter Grundfos submersible pump was used to perform the aquifer tests.

Five short-duration pumping intervals (steps) without recovery in between were conducted on October 1. The primary objective of the short-duration step tests was to assess the hydraulic behavior of the system and properly determine the optimal pumping rate for the 24-h test. The step tests demonstrated that the specific capacity of the well does not seem to depend on the pumping rate, which suggests the well is fully developed. During the step tests, the specific capacity varied between 100 and 120 m<sup>2</sup>/d (5.5 and 6.6 gpm/ft). The pumping at the highest rate produced about 5 m (~16 ft) drawdown within the screen. However, the well-specific capacity does not decline with the increase of the pumping rate (LANL 2015, 600170, Appendix D). This suggests that borehole skin effects cause a portion of the drawdown. Nevertheless, the pumping causes a decline in the regional water table. Therefore, unconfined (phreatic) groundwater flow is occurring near the pumped well.

A 24-h aquifer test was completed on October 3. The test was conducted at a pumping rate of 517.6  $m^3/d$  (94.9 gpm). The 24-h aquifer test analyses suggested a formation transmissivity on the order of 490  $m^2/d$  (40,000 gallons per day/ft). This transmissivity value is very similar to the estimate obtained by a recent analysis of R-28 aquifer test conducted in 2014 (LANL 2014, 255110).

The saturated thickness corresponding to the transmissivity value is not known in order to estimate hydraulic conductivity. The saturated thickness is impacted by the pumping because the pumping causes a decline in the regional water table. If it is assumed the saturated thickness is the length of the initial saturated screened interval (~43 ft before the pumping started) minus a half the observed drawdown (~10 ft), the estimated average hydraulic conductivity is about 49 m/d or 161 ft/d. However, this estimate is uncertain. Still, the value of hydraulic conductivity is consistent with the estimate obtained for R-28 (~120 ft/d).

The CrEX-1 transmissivity and hydraulic conductivity estimate suggests the extraction well is within a highly permeable zone of the regional aquifer. This can be very beneficial in terms of the CrEX-1 primary objective of hydraulic capture. Appendix D of the CrEX-1 Completion Report presents the complete results and analysis of the CrEX-1 aquifer test.

After the completion of the 24-h-pumping test, CrEX-1 was continuously pumped from October 5 to November 26, 2014. The 52-d pumping was conducted at an average pumping rate of about 81 gpm. On December 1, the pumping resumed for another 11 d at a similar rate. During the last 2 d of pumping, higher pumping rates were attempted, but it appeared that at rates greater than 100 gpm too much drawdown occurred in the well to sustain rates greater than 100 gpm.

The extended pumping at CrEX-1 provided additional data for analyses of aquifer properties. More importantly, the extended pumping allowed for detection of pressure declines at the nearby observation wells.

### A-4.0 ANALYSIS OF CrEX-1 PUMPING TEST DATA

The water-level data for the CrEX-1 pumping test were analyzed using the method described in (Vesselinov and Harp 2011, 227709) to estimate the drawdowns that can be attributed to each nearby monitoring well. The analyses account for the pumping effects caused not only by CrEX-1 but also the municipal water supply pumping at PM-4, PM-2, O-4, etc. The analyses utilize two open-source codes developed at the Laboratory: WELLS (<u>http://wells.lanl.gov</u>) and MADS (<u>http://mads.lanl.gov</u>). WELLS is applied to simulate the drawdowns caused by the pumping at CrEX-1 and the water supply wells. MADS is applied to (1) deconstruct pumping drawdowns caused by different pumping wells and (2) estimate aquifer properties by matching the simulated and observed hydraulic heads at the observation wells.

Figures A-4.0-1 through A-4.0-19 present the results of this analysis. Each figure shows the model-based deconstruction of the water-level transients observed in each monitoring well during the 2014 CrEX-1 pumping period. In each figure, the upper plot shows the observed and simulated water levels at the monitoring well, and the lower plot shows the attribution of the drawdown to each of the wells pumped during the observation period: O-4, PM-2, PM-3, PM-4, PM-5, CrEX-1, R-42, and R-28. The analyses require long data records. The longer the record, the more accurate are the deconstructed pressure estimates. Table A-4.0-1 lists the estimated CrEX-1 drawdowns at the end of the CrEX-1 pumping tests.

Uncertainties associated with estimates of aquifer properties based on the CrEX-1 pumping data are because of the small magnitude of the drawdowns measured in some of the observation wells. The presented estimates in Table A-4.0-1 are preliminary. Additional data collected during upcoming 2015 CrEX-1 pumping test will help to substantially reduce the uncertainties and better characterize aquifer properties.

Based on the results shown in Figures A-4.0-1 through A-4.0-19, the following important observations can be made about the aquifer behavior during the 2014 CrEX-1 pumping test.

The CrEX-1 induced drawdown is uncertain at CrPZ-1 (CrCH-1 on Figure A-4.0-1). The collected pressure record was very short. However, it can be concluded that changes in the pumping rates in CrEX-1 in December 2014 may have caused pressure transients at CrPZ-1; although this conclusion is expected, more data are needed to better understand the CrPZ-1 hydraulic response to CrEX-1 pumping.

R-1 transients are well reproduced by the model but the model-estimated CrEX-1 drawdown is questionable and small, if present (Figure A-4.0-2). R-11 and R-13 transients are also well reproduced by the model (Figures A-4.0-3 and A-4.0-4); the CrEX-1 drawdown in these wells is small but potentially well defined by the existing data and applied model.

There are some potential problems with the late 2014 water-level data collected at R-15 (Figure A-4.0-5); the steady flat pressure decline observed in late 2014 contradicts the previous model analyses. Therefore, the data are not sufficient to define the CrEX-1 drawdown in this monitoring well.

R-33 screen 1 and R-35b transients are well reproduced by the model, but the CrEX-1 drawdown contribution is questionable and small, if present (Figures A-4.0-6 and A-4.0-7). The pressure data collected in R-33 screen 2 is difficult to analyze because of the strong pressure transients caused by the municipal water-supply pumping, and thus the data and modeling results are not included here.

Data gaps and uncertainties are associated with the R-42 pressure record that make the analyses difficult and the CrEX-1 drawdown estimate is uncertain (Figure A-4.0-8).

R-43 screen 1 and screen 2 transients are well reproduced by the model, but the model-predicted CrEX-1 drawdown is uncertain and small, if present (Figures A-4.0-9 and A-4.0-10).

Figures A-4.0-11 through A-4.0-18 show the drawdowns in a series of two-screen wells near CrEX-1: R-44, R-45, R-50, and R-61. The results for these wells show that pressure transients are very well reproduced by the model.

R-50 screens show the largest drawdowns observed by any of the monitoring wells (Figures A-4.0-15 and A-4.0-16). There are important discrepancies between the observed and model simulated pressure transients during the CrEX-1 pumping test related to R-50. The model reproduces relatively well the pressure transient including the limited recovery record after the pumping termination (Figures A-4.0-15 and A-4.0-16). However, the model overpredicts the pressure decline at the beginning of the CrEX-1 pumping test. It is expected that this be caused by phreatic effects. The applied model does not account for vadose zone and water table hydraulic impacts during the CrEX-1 pumping test and this is the possible reason for the discrepancy. This observation is important because it provides insights about the aquifer properties in the area between CrEX-1 and R-50. Additional pressure data collected during 2015 CrEX-1 pumping conducted for the interim measure will help to better understand site hydraulic conditions.

Figure A-4.0-19 shows the pressure transients in R-62. Data gaps and uncertainties are associated with R-62 pressure record that make the analyses difficult and the estimates unclear.

It is important to note that substantial data gaps and uncertainties are also associated with R-28 pressure records in 2014 (the data are not presented here), making a complete analysis related to the CrEX-1 pumping test difficult. More data are needed to understand the R-28 hydraulic response to CrEX-1 pumping.

As discussed earlier, the aquifer is expected to be heterogeneous. The estimated transmissivity and storativity values in Table A-4.0-1 seem to confirm this expectation. The estimated values in the table represent effective aquifer properties between the pumping (CrEX-1) and observation wells. The analyses are based on an analytical model (Theis) that assumes uniformity in aquifer properties and confined conditions. These assumptions are not expected to be valid so the estimated transmissivity and storativity values should be analyzed with care. Nevertheless, the relatively large variability in the estimated transmissivity and storativity values suggest pronounced aquifer heterogeneity.

### A-5.0 ANALYTICAL ANALYSIS OF CrEX-1 CAPTURE ZONE

Table A-4.0-1 shows the pumping-related drawdowns at the end of the 2014 CrEX-1 pumping period. Here, the zone of influence (the ZOI or the cone of depression) is identified as the area within which measurable pumping drawdown greater than 0.01 m can be detected. Theoretically, very small (immeasurable) drawdowns will be manifested throughout the regional aquifer. However, practically speaking, the ZOI is defined as the zone where drawdown greater than 0.01 m can be detected. The CrEX-1 ZOI appears to be extensive (Table A-4.0-1). The only nearby well that was not apparently influenced by CrEX-1 pumping is R-36.

The ZOI during aquifer pumping is different than the CZ, which represents the portion of the aquifer that is affected by the pumping well in such a way that all the groundwater within the CZ will be pumped out by the well. In the case of a uniform isotropic aquifer, the shape of ZOI and CZ will be similar: it will be a

circle centered at the pumping well. The radius of the circle will depend on the pumping time. Typically, the ZOI is larger than the CZ.

However, in the case of ambient flow, the shape of the CZ will have an elongated form with a predominantly upstream spatial extent. A schematic representation of the CZ shape is presented in Figure A-5.0-1. The CZ estimate typically assumes only an advective steady-state groundwater flow. However, because of groundwater dispersion, some of the groundwater within the CZ will escape capture while some of the groundwater outside the CZ will be captured. Because of transients in the groundwater pressures and flow velocities from induced pumping at CrEX-1, the CZ will grow around the pumping well until a quasi-steady-state flow regime is established around the pumping well.

Under the quasi-steady-state, the pressures still decline from pumping; however, the hydraulic gradients equilibrate to the final steady-state values. The zone of quasi-steady-state flow regime (ZQSS) grows in time around the pumping well, and the rate of propagation depends on the aquifer properties and the pumping rate. Both the ZOI and the ZQSS are expected to have a similar shape (circular in the case of a uniform aquifer). The CZ shape depends on the ambient flow properties (Figure A-5.0-1) that is, the magnitude of the ambient groundwater flow. The CZ extent upgradient grows in time and depends on both the pumping duration and rate, and on the ambient groundwater flow properties. The CZ extent downgradient reaches an inflection point after a given period of pumping and cannot be increased further.

In general, the CZs of pumping wells have a three-dimensional shape characterized by three-dimensional structure and properties of the regional groundwater flow during the aquifer test. As a result, the CZ depends on various hydrogeologic factors:

- pumping rate and duration;
- shape of the regional water table;
- aquifer thickness;
- spatial and temporal distribution in aquifer flow velocities controlled predominantly by heterogeneity and anisotropy in aquifer properties (permeability, storativity, etc.);
- spatial and temporal variability in aquifer recharge controlled predominantly by heterogeneity and anisotropy in vadose zone properties and spatial and temporal distribution of infiltration along the nearby canyons; and
- influence of water-supply pumping at nearby municipal water-supply wells (PM-3, PM-5, PM-4 and PM-2); the water-supply pumping causes small changes in the water levels measured at monitoring wells. As a result, it is expected that the water-supply pumping does not significantly affect the shape of the CrEX-1 CZ.

It is important to emphasize that the magnitude of aquifer recharge can be an important factor affecting the size of the estimated CrEX-1 CZ. In general, the magnitude of aquifer recharge on the Pajarito Plateau is relatively small (less than 1 mm/yr), and recharge at this scale is not expected to significantly influence the shape of the CZ of pumping wells. In this case, for modeling purposes, the regional water table can be approximated as a no-flow boundary. However, higher recharge rates in the plume area resulting from localized recharge along Sandia and Mortandad Canyons can significantly influence the shape of the CZ.

# A-5.1 CrEX-1 Capture Zone Estimate Based on the Pumping Rate Only

The CZ at CrEX-1 can be estimated based on the volume of water pumped. This approach allows for better approximation of the CZ size at early times when the pumping period is relatively short (for example, less than 100 to 300 days).

In this case, the CZ is assumed to have a cylindrical shape with a constant vertical height H (depending on the well screen length) and time-varying horizontal radius R. To account for the three-dimensional component of groundwater flow near the well screen, the vertical height H is assumed to be approximately 1.5 times the screen length; for example, H is ~15 m (50 ft) for CrEX-1. In this case, the three-dimensional aspect of the groundwater flow increases the CZ thickness only below the screen, not above the screen because at the top the CZ is bounded by the regional water table. The cylinder radius can be computed using the following formula:

$$R = \sqrt{\frac{Q_P t}{\pi \phi_S H}}$$

where  $Q_p$  is the pumping rate, *t* is pumping duration,  $\phi_s$  is the water storage porosity. If the total waterfilled porosity is assumed to be 0.3, the CZ after 52 d of pumping has a radius of 32 m (~110 ft) around the well. However, this CZ estimate does not account for ambient groundwater flow in the aquifer.

### A-5.2 CrEX-1 Capture Zone Estimate Based on Ambient Aquifer Flow

The CZ can also be estimated based on the width of groundwater flow within which the ambient groundwater flux is equal to the pumping rate (Figure A-5.0-1). In this case, the CZ grows upgradient until reaching a width within which the ambient groundwater flow rate is equal to the pumping rate (Figure A-5.0-1). This approach allows for a better approximation of the CZ size at late times when the pumping period is relatively long, allowing establishment of a quasi-steady state flow regime near the pumping well. This approach is best applied for long-duration pumping periods, greater than 100 to 300 days. This is a function of the aquifer properties. In this case, the width of the CZ perpendicular to the groundwater flow direction becomes a constant in time once the flow reaches a quasi-steady state.

Assuming uniform confined groundwater flow conditions, the flow rate Q through a vertical section in the regional aquifer with a horizontal width W can be computed as:

$$Q = ITW$$

The width *W* can be computed as:

$$W = \frac{Q_P}{IT}$$

The ambient groundwater flow in the aquifer near CrEX-1 has hydraulic gradient of about 0.001. For pumping rate of 81 gpm and transmissivity of 40,000 gpd/ft, the width of CZ upgradient from CrEX-1 is about 900 m (~3000 ft) perpendicular to the groundwater flow direction. The CZ width adjacent to CrEX-1,  $W_w$  (Figure A-5.0-1) is exactly half of the upgradient width W, or about 450 m (~1500 ft). These are initial model estimates because there are uncertainties in the ambient hydraulic gradient and the large-scale aquifer transmissivity that define the ambient groundwater flux. For example, if the hydraulic gradient is an order of magnitude higher (0.01, i.e., ambient groundwater flux is an order of magnitude higher), the width of CZ upgradient from CrEX-1 will be approximately 90 m (~300 ft). The data collected during fieldwork in 2015 (pumping and tracer tests) will provide additional information to constrain this

uncertainty. It is also important to emphasize that these estimates are based on assumptions for uniform and homogenous groundwater flow; aquifer heterogeneity will further impact the shape and site of the CZs.

The maximum length of capture in the downgradient direction,  $L_0$ , from the pumping well (Figure A-5.0-1) can be expressed as follows:

$$L_0 = \frac{Q_p}{2\pi TI}$$

For a pumping rate of 81 gpm, the length of CrEX-1 CZ in the downgradient direction,  $L_0$ , is about 143 m (~580 ft). If the hydraulic gradient is an order of magnitude higher (0.01), the width of CZ upgradient from CrEX-1 is only about 14 m (~45 ft).

Once the equilibrium between the pumping and ambient flow rates has been established, the pumped well will capture the groundwater flowing toward the well in the CZ. The length L of the CZ upgradient of CrEX-1 (Figure A-5.0-1) depends on the groundwater flow pore velocity and the pumping duration.

It is important to emphasize that the dimension of the CZ computed above is for long-term pumping periods. For example, if the CrEX-1 pumping was turned on for an extended period of more than 300 d, the presented CZ estimates will be valid estimates (assuming that the aquifer is uniform). However, the CrEX-1 aquifer test data also demonstrate that the aquifer is also highly heterogeneous. As a result, the shape of the steady-state CZ will likely have a much more complicated shape and will likely have dimensions less than those estimated above.

The CrEX-1 CZ during the 2014 pumping period (because of the relatively short duration of the tests) is expected to be more consistent with the estimates based on the pumped volume. Therefore, the CrEX-1 CZ during the 2014 pumping period is estimated to have radius of about 32 m (110 ft) around the pumping well.

### A-6.0 NUMERICAL MODEL ANALYSIS OF CrEX-1 PUMPING

A numerical model of groundwater flow and contaminant transport in the regional aquifer beneath the Sandia and Mortandad Canyons area is developed to inform and enhance the understanding of the fate and transport of chromium in the environment. This section describes the current state of the development of the numerical model and discusses the current modeling results. This is a work in progress and a continuation of the model analyses presented in the 2008 "Fate and Transport Investigations Update for Chromium Contamination from Sandia Canyon" (LANL 2008, 102996) and the 2012 "Phase II Investigation Report for Sandia Canyon" (LANL 2012, 228624).

Flow numerical simulations are applied to predict the groundwater flow in the regional aquifer in the chromium plume area. Groundwater flow and contaminant transport in the unsaturated zone are not part of the current modeling effort.

A three-dimensional unsaturated zone model is contained in Appendix J of the 2008 "Fate and Transport Investigations Update for Chromium Contamination from Sandia Canyon" (LANL 2008, 102996). The vadose-zone model analyses demonstrated the potential three-dimensional channeling and lateral diversion (along hydrostratigraphic contacts) of water infiltrating beneath Sandia Canyon before it reaches the regional aquifer. Further developments of the three-dimensional unsaturated zone model are ongoing as well.

#### ENCLOSURE 2

The current goal is to generate a model calibrated against existing water-level observations during the 2014 CrEX-1 pumping period. The model will also be calibrated to reproduce the pumping effects caused by municipal water supply–well pumping near the plume area. Additionally, the model will be calibrated to the cross-well pumping effects caused by pumping at R-42 and R-28 during short- and longer-term pumping tests previously conducted in these wells.

However, the model currently does not represent (1) the ambient groundwater flow at the site, (2) the long-term water-level changes in the regional aquifer, and (3) the long-term chromium concentration transients observed in the site monitoring wells. In the future, these components will be added to the calibration process as well. The model is also representing the aquifer as confined. More complex model analyses accounting for the impacts of the phreatic and the vadose zones on the regional aquifer flow will be developed in the future as well. The model also currently simulates the flow medium as a single continuum and does not represent potential dual porosity within the aquifer materials. Updated modeling analyses will incorporate dual porosity effects for the regional aquifer, which may also exhibit substantial spatial variability especially as it affects storage of chromium.

The model is calibrated against existing water-level drawdowns observed at regional wells R-1, R-33 (2 screens), R-15, R-62, R-43 (2 screens), R-42, R-28, R-61 (2 screens), R-50 (2 screens), R-45 (2 screens), R-44 (2 screens), R-11, R-13, R-35b, R-36, and R-34; 16 wells and 22 screens in total. The model simulates the pumping effects caused by CrEX-1, R-42, R-28, PM-1, PM-2, PM-3, PM-4, PM-5, and O-4.

The model is calibrated using an automated calibration process employing the Levenberg-Marquardt optimization algorithm as implemented in the code MADS (<u>http://mads.lanl.gov</u>). The objective function subject to minimization is defined as

$$\Phi = [\mathbf{c} - f(\mathbf{b})]^{\mathsf{T}} \mathbf{W} [\mathbf{c} - f(\mathbf{b})]$$

where **c** is a vector  $[N \times 1]$  of optimization targets, **b** is a vector  $[M \times 1]$  of model parameters, **W** is a diagonal weight matrix  $[N \times M]$ , and **f** is the model. While  $\Phi$  is minimized, the algorithm searches for the maximumlikelihood parameter set **b** that provides the best fit between simulated  $f(\mathbf{b})$  and measured **c** quantities. The vector of optimization targets includes estimated drawdowns in the monitoring wells. **W** represents the relative weight of each optimization target defined subjectively based on the magnitude of the calibration data. The vector **b** includes various model parameters considered in the inverse analysis.

The model development included a series of inverse analyses with different complexity. The final model has on the order of 84 unknown model parameters (outlined in the next section) and about 182,070 calibration targets.

The model domain and the computational grid are shown in Figure A-6.0-1. The figure represents the three-dimensional model domain, computational grid, and locations of the monitoring well screens included in the model. The computational grid is structured with local grid refinements near the existing wells. Vertically, the grid has higher resolution close to the top of the model and grid spacing increases with depth. The lateral spacing is approximately 50 × 50 m (~160 × 160 ft). The vertical spacing varies from about 1 m to 15 m. The grid includes about 540,000 nodes and about 3,053,000 elements. The colors in Figure A-6.0-1 represent the different geologic units. The top of the model is constrained by the regional water table. The grid is designed to provide sufficient computational accuracy and efficiency for the performed model analyses. The model domain extends approximately 20 km west-east, approximately 16.5 km north-south, and approximately 1075 m vertically. All the model boundaries are defined as no-flow boundaries. Initial boundary condition is a constant head (zero drawdown) throughout the model domain. The regional aquifer is simulated as confined while, in reality, the aquifer is phreatic

(unconfined). Model simulations representing the regional water table as a material boundary are feasible but much more computationally intensive. Given the small magnitude of the water-level fluctuations, the current modeling approach is justified.

The computer code LaGriT (<u>http://lagrit.lanl.gov</u>) was used to create the computational grids. The flow and transport simulations were performed with the Finite Element Heat and Mass Transfer code ([FEHM] <u>http://fehm.lanl.gov</u>) (Zyvoloski et al. 1996, 054421; Zyvoloski et al. 1997, 070147). FEHM was developed by researchers at the Laboratory and is capable of simulating three-dimensional, time-dependent, multiphase, non-isothermal flow, and multicomponent reactive groundwater transport through porous and fractured media. FEHM has been used in a wide variety of applications. The software is mature, has users throughout the world, and has been certified through the Yucca Mountain Project Software Quality Assurance Program. FEHM is available to the public and operates under various operating systems (Windows, MAC OS X, Linux, etc.).

The simulations are performed assuming unknown aguifer properties. The grid does not include distinct stratigraphic boundaries although they are known to be present within the model domain. Previous analyses of water-level responses to water-supply pumping and during the CrEX-1, R-28, and R-42 pump tests indicate aguifer materials are heterogeneous potentially at scales less than the size of the individual units and no distinct contrasts exist between different units. Therefore, aquifer permeability is simulated using geostatistical modeling and the pilot-points method. The pilot points are fixed locations where aquifer permeability and storativity are adjusted during the calibration process. The permeability and storativity at the pilot points are applied to compute aquifer permeability and storativity within the model domain using kriging. The values at the pilot points are adjusted during model calibration to represent heterogeneous fields that produce groundwater flow consistent with the observed calibration data. The analyses presented below employed 28 pilot points located within and around the area containing the chromium plume. The applied set of pilot points cannot be expected to characterize small-scale aguifer heterogeneity; it is expected only to define potential large-scale structures that control groundwater flow and contaminant transport. No prior information from pumping tests at the monitoring wells is applied to define or constrain the aquifer permeability at the pilot points. The three-dimensional kriging is performed using the code GSTAT (http://www.gstat.org) to compute permeability values for each node in the model domain representing aquifer heterogeneity.

The modeling results representing a comparison between the calibration targets and obtained model drawdowns predictions are shown in Figures A-6.0-2 through A-6.0-17. In general, the model predicts with good fidelity the observed drawdowns. Some of the drawdowns during CrEX-1 pumping are matched very well, especially at the wells located relatively close to CrEX-1. For example, the calibration targets for R-11, R-13, R-44 screen 1, R-45 screen 1, R-50 screen 1, R-50 screen 2, drawdowns are well represented by the model. The matches between observations and model predictions for the other monitoring well screens need more work.

The inverse analysis specifically targeted the characterization of the mid- and late-time drawdowns in R-50 screens 1 and 2 (Figures A-6.0-15 and A-6.0-16) and these portions of the drawdown curves are well predicted by the numerical model. As discussed in section 4 above, the early-time drawdowns in R-50 (Figures A-4.0-15 and A-4.0-16) are not well represented because of a potential impact of conditions that are not embodied in the current numerical model; the 2015 CrEX-1 pumping record will help to better resolve this conceptual uncertainty. Since the hydraulic communication between R-50 and CrEX-1 is important for predictions related to the impact of CrEX-1 pumping on the R-50 chromium concentrations, the capability of the current model to represent a large portion of the observed drawdown curves in R-50 is of great importance.

It is essential to note that the results modeled are based on relatively limited existing data and will be significantly enhanced during the upcoming pumping and monitoring period.

The estimated hydraulic conductivity (lateral and vertical) is shown in Figure A-6.0-18. The inverse model analysis accounts for R-28 and CrEX-1 pumping records. The inverse model analysis also takes into account the pressure changes observed during municipal water-supply pumping in the nearby groundwater production wells. The obtained estimates of the aquifer properties represent a three-dimensional tomographic image of the aquifer hydraulic conductivity. The figure demonstrates the pronounced aquifer heterogeneity, which is an estimate, based only on the pumping drawdowns observed in the monitoring wells. It is expected the solution is nonunique and that numerical models with alternative conceptualization and model parameters can be obtained that are also consistent with the available data. Therefore, the obtained modeling results should not be considered to be the only possible solution of the analyzed problem. It is also important to note that these results are preliminary and will benefit from additional data collected for the interim measure. Additional modeling work is being performed to address these uncertainties and their impact on the selection of potential remediation scenarios.

### A-7.0 NUMERICAL MODEL ANALYSIS OF CrEX-1 CAPTURE ZONE

The estimated hydraulic conductivity field discussed in section A-6.0 (Figure A-6.0-18) is applied to estimate the CrEX-1 CZ. To do so, the hydraulic conductivity field is applied in the 2012 numerical model. The 2012 model is used because it has been already calibrated to the hydraulic heads in the aquifer in the plume area (LANL 2012, 228624). The current model presented in section A-5.0 has not yet been calibrated to the hydraulic heads. The current model has been calibrated only against the drawdowns caused by site pumping tests and municipal water-supply pumping. The mapping of the new estimates of the hydraulic conductivity field on the 2012 model definitely impacts the accuracy in the model predicted hydraulic gradients. This is done only to get preliminary estimate of the potential shape of the CrEX-1 CZ and the effect of aquifer heterogeneity on model predictions. This is a preliminary analysis. An updated model currently being calibrated against hydraulic heads observed to date in the monitoring wells in the plume area combined with additional model updates based on future data will give much more representative results.

Preliminary model predictions of the CrEX-1 CZ after 1, 3, and 5 yr of pumping are presented in Figure A-7.0-1. The model predictions represent the groundwater flow paths assuming only advective flow. However, dispersion processes occurring in the groundwater flow within porous media will impact the CZ estimates. The predictions are based on the heterogeneities presented in Figure A-6.0-18.

The CrEX-1 modeled CZs are shown in Figure A-7.0-1. The model predicts that the CZ extends to the west-northwest of the well. This result suggests that long-term CrEX-1 pumping may have beneficial impact on the plume concentrations. However, because of aquifer heterogeneity, including a zone of relatively low permeability in the R-42 area (Figure A-6.0-18), the long-term CrEX-1 pumping would not be expected to significantly affect chromium concentrations in the centroid of the chromium plume.

Preliminary model predictions in Figure A-7.0-1 represent the groundwater flow paths, assuming only advective flow. However, dispersion processes are expected to occur in groundwater flow within porous media, and these processes will impact the shape of the CZs. As a result of the dispersion, some of the contaminant mass outside the model predicted CZ is expected to be captured as well. However, the dispersion may also cause some of contaminant mass within the modeled CZ to escape capture by CrEX-1. The CrEX-1 CZ will be also impacted by transients in the regional groundwater flow. Additional pumping and injection of groundwater near CrEX-1 will impact the shape of the CrEX-1 CZ as well.

These modeling results are preliminary and will be updated as more data are available from the pumping and monitoring of pressure responses. The preliminary results demonstrate the potential complexity in the aquifer properties and the associated difficulties to estimate the CrEX-1 CZs. The ongoing modeling analyses and the upcoming additional data collection activities in 2015 are expected to reduce these uncertainties.

#### A-8.0 NUMERICAL MODEL ANALYSIS OF PLUME RESPONSE TO THE INTERIM MEASURES

In this section, the 2012 model is applied to estimate the impact of the proposed interim measures activities on the chromium concentrations and plume configuration in the regional aquifer. The 2012 model is the preferred model for this analysis because it has been successfully calibrated to (1) the hydraulic heads and (2) the chromium concentrations in the aquifer in the plume area. However, the 2012 model is not calibrated to represent the drawdowns observed during the recent R-28 and CrEX-1 pumping periods. The 2012 model is also not calibrated to represent the 2014 tracer test data. Future modeling analyses will use the model update discussed in section 5 that will include all these calibration data sets.

A model prediction of the chromium concentrations in 2016 and 2021 without active pumping is shown in Figure A-8.0-1. The model predictions are based on the 2012 model (LANL 2012, 228624). These results are presented for a comparison with the modeling results presented below for the case of active groundwater pumping and injection.

Model predictions of the impact of various interim measures scenarios on the chromium concentrations are presented in Figure A-8.0-2 and A-8.0-3. The plots are showing model predictions in 2016, 2017, 2019, and 2021 (after 0, 1, 3 and 5 yr of pumping/injection, respectively).

In the first case (Figure A-8.0-2), CrEX-1 is pumping for 5 yr at 80 gpm (2016–2021), CrIN-4 and CrIN-5 are injecting at 40 gpm each for 5 yr (2016–2021). CrIN-4 and CrIN-5 are located east and west of R-50, respectively. The model predicts that pumping of CrEX-1 as well as the injection at CrIN-4 and CrIN-5 provide a very beneficial impact on the contaminant plume, substantially decreasing the contaminant concentrations at the downgradient plume edge in the area around R-50.

In the second case (Figure A-8.0-3), CrEX-1 is pumping for 5 yr at 80 gpm (2016–2021), CrIN-1 and CrIN-2 are injecting at 40 gpm each for 5 yr (2016–2021). CrIN-1 and CrIN-2 are located in the area near R-45. Note that in this case, the model predicts that pumping at CrEX-1 and injection near R-45 does not have as beneficial an impact on the contaminant plume near the Laboratory boundary as in the previous case with groundwater injection at CrIN-4 and CrIN-5. However, the model predicts that injection of groundwater in CrIN-1 and CrIN-2 has a beneficial impact on the contaminant concentrations in the R-45 area.

These model scenarios are also illustrated by the concentration curves for R-45 screen 1 and R-50 screen 1 presented in Figure A-8.0-4. The figure presents model predictions for the chromium concentration in these two well screens under different scenarios. The scenarios are (1) no action; (2) CrEX-1 pumping only (at 80 gpm for 5 yr); (3) CrEX-1 pumping and CrIN-4/CrIN-5 injecting (pumping regime as defined above); and (4) CrEX-1 pumping and CrIN-1/CrIN-2 injecting (pumping regime as defined above). R-45 concentrations are substantially impacted only by the CrIN-1/CrIN-2 injection (scenario 4 above). R-50 concentrations are impacted in all pumping/injection scenarios but the most favorable impact occurs when CrIN-4/CrIN-5 are injecting (scenario 4 above).

#### 9.0 REFERENCES

The following list includes all documents cited in this appendix. Parenthetical information following each reference provides the author(s), publication date, and ER ID or ESH ID. This information is also included in text citations. ER IDs were assigned by the Environmental Programs Directorate's Records Processing Facility (IDs through 599999), and ESH IDs are assigned by the Environment, Safety, and Health (ESH) Directorate (IDs 600000 and above). IDs are used to locate documents in the Laboratory's Electronic Document Management System and, where applicable, in the master reference set.

Copies of the master reference set are maintained at the New Mexico Environment Department Hazardous Waste Bureau and the ESH Directorate. The set was developed to ensure that the administrative authority has all material needed to review this document, and it is updated with every document submitted to the administrative authority. Documents previously submitted to the administrative authority are not included.

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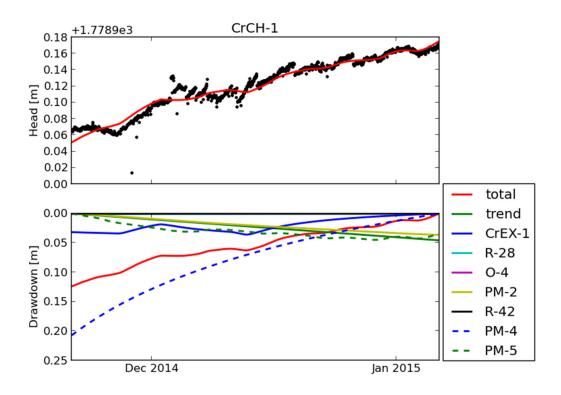


Figure A-4.0-1 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for CrCH-1

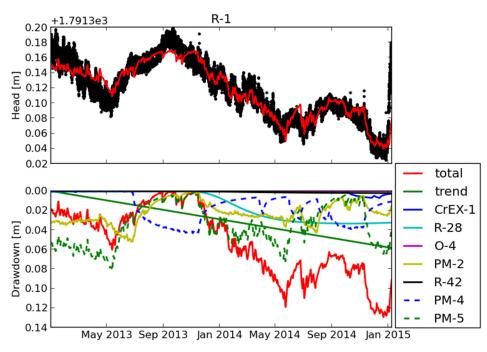


Figure A-4.0-2 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-1

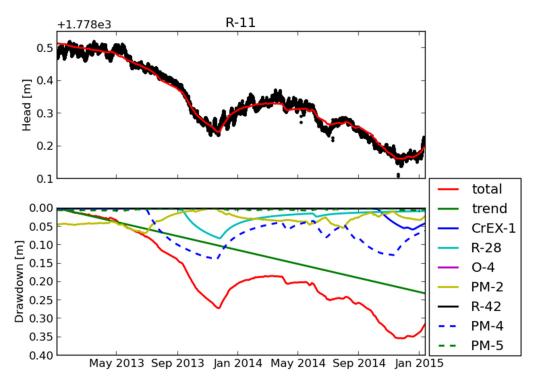


Figure A-4.0-3 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-11

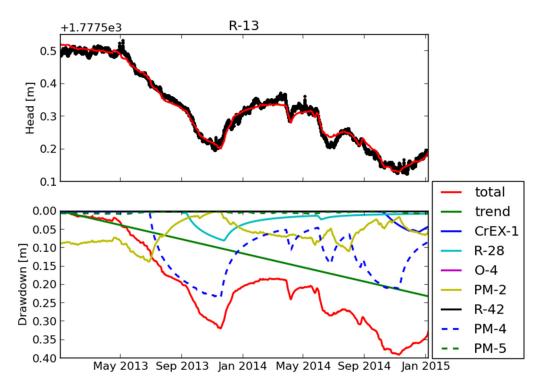


Figure A-4.0-4 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-13

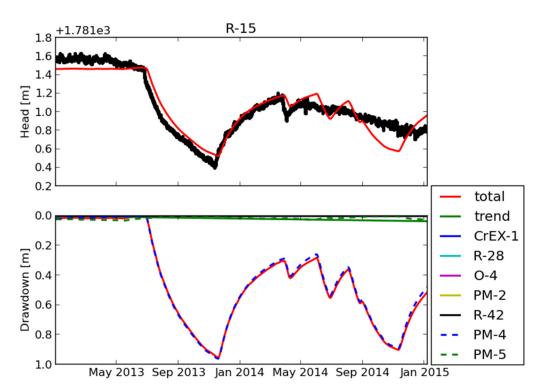


Figure A-4.0-5 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-15

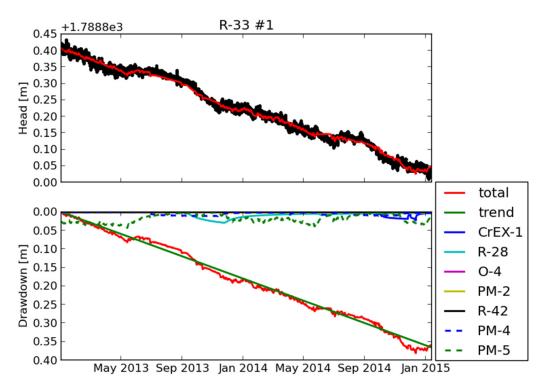


Figure A-4.0-6 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-33 screen 1

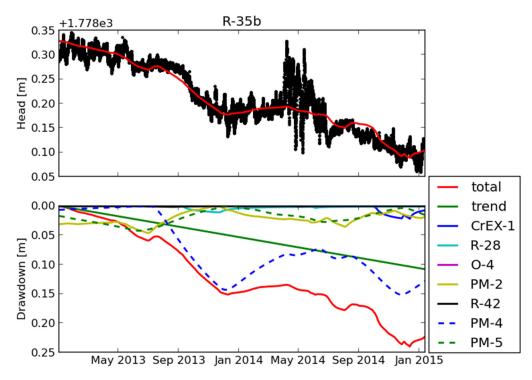


Figure A-4.0-7 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-35b

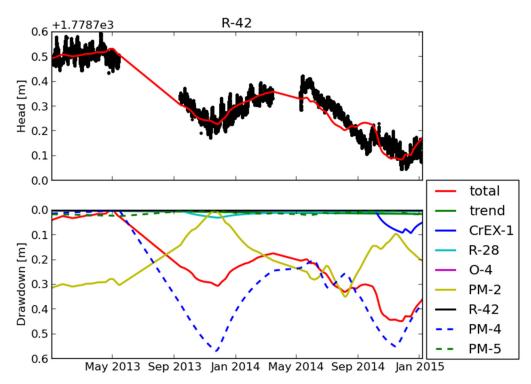


Figure A-4.0-8 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-42

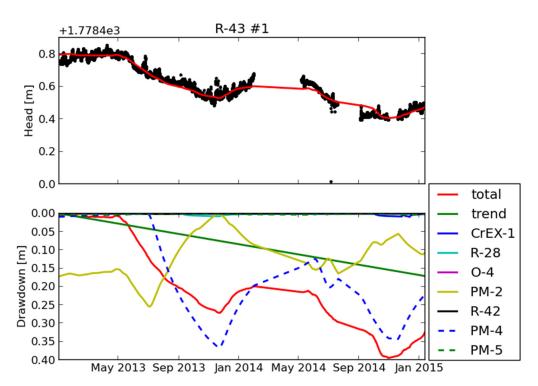


Figure A-4.0-9 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-43 screen 1

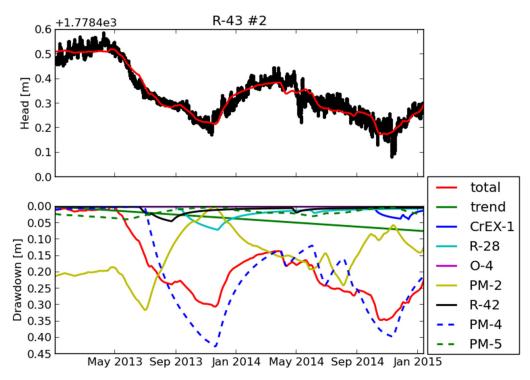


Figure A-4.0-10 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-43 screen 2

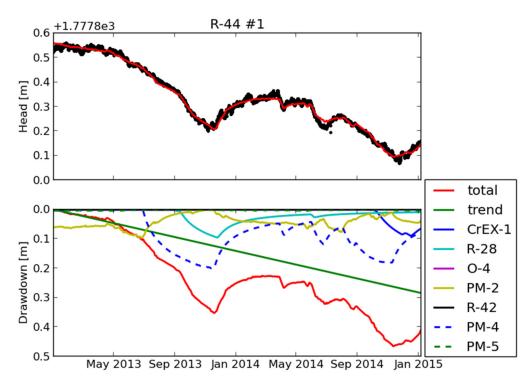


Figure A-4.0-11 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-44 screen 1

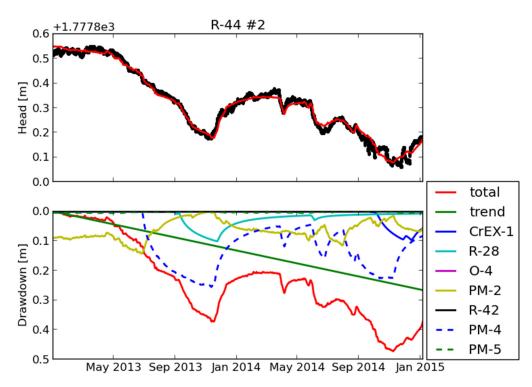


Figure A-4.0-12 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-44 screen 2

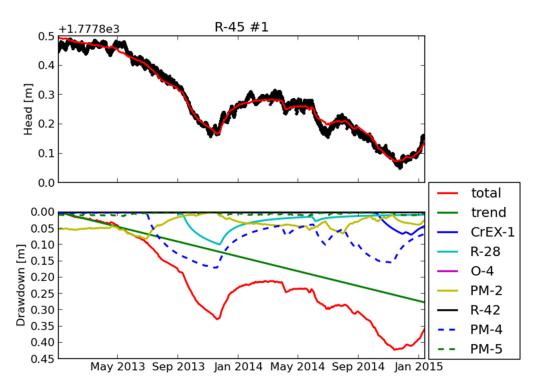


Figure A-4.0-13 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-45 screen 1

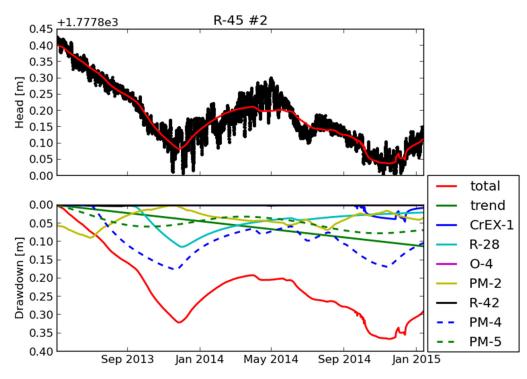


Figure A-4.0-14 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-45 screen 2

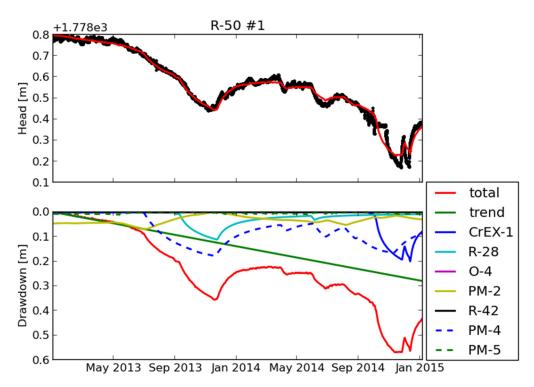


Figure A-4.0-15 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-50 screen 1

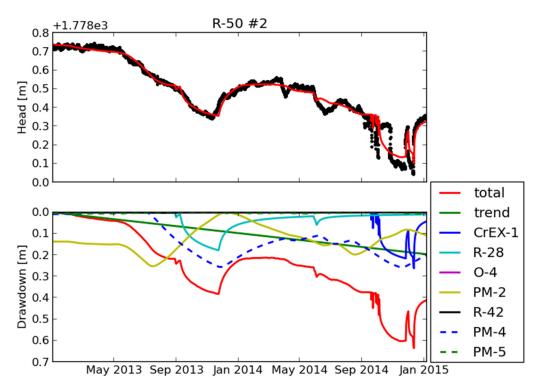


Figure A-4.0-16 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-50 screen 2

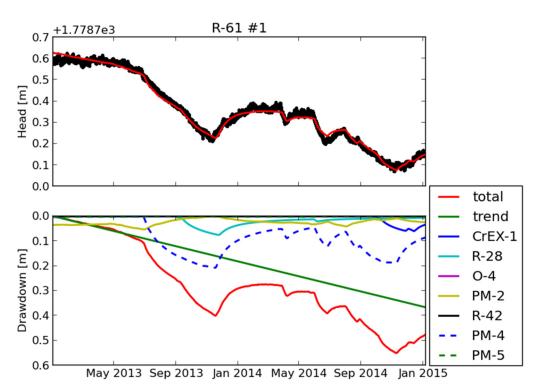


Figure A-4.0-17 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-61 screen 1

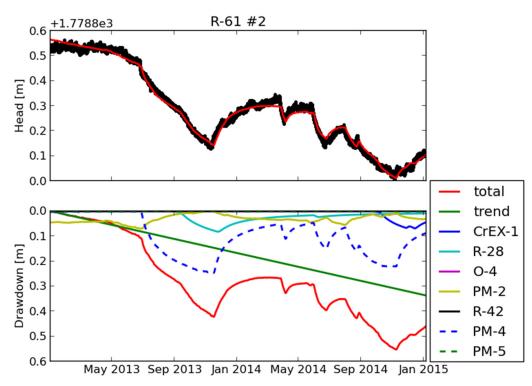


Figure A-4.0-18 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-61 screen 2

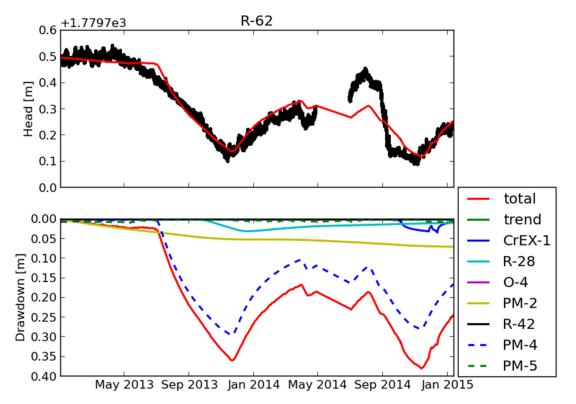


Figure A-4.0-19 Observed (black dots in the upper figure) and simulated (red line in the upper figure) heads are depicted in the upper figure, and the simulated drawdowns are depicted in the lower figure for R-62

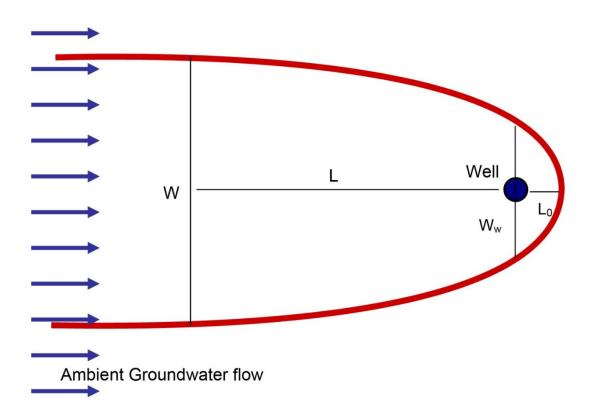
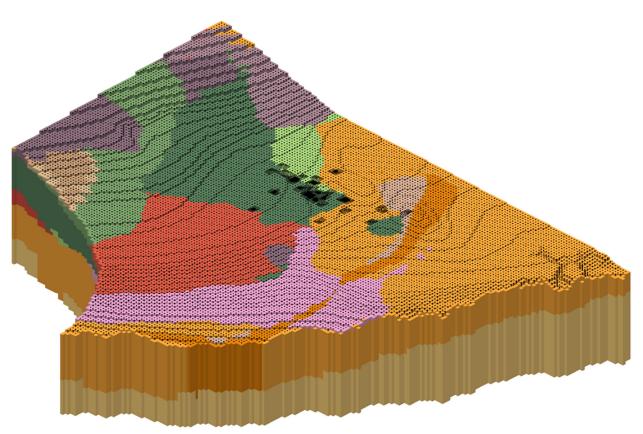


Figure A-5.0-1 Schematic representation of CZ of CrEX-1 assuming only advective steady-state groundwater flow through the regional aquifer



Notes: The computational grid is structured with local grid refinements near the existing wells. Vertically, the grid has higher resolution close to the top of the model and grid spacing increases with depth. The lateral spacing is ~50 × 50 m (~160 × 160 ft). The vertical spacing varies from about 1 m to 15 m. The grid includes about 540,000 nodes and about 3,053,000 elements. The coloring represents the different geologic units. The top of the model is constrained by the regional water table.

#### Figure A-6.0-1 The model domain and the computational grid

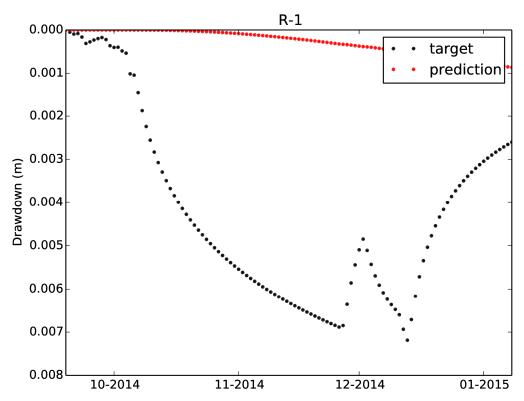


Figure A-6.0-2 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-1 to pumping at CrEX-1

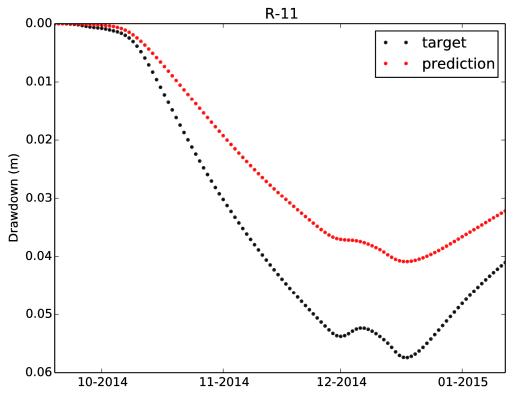


Figure A-6.0-3 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-11 to pumping at CrEX-1

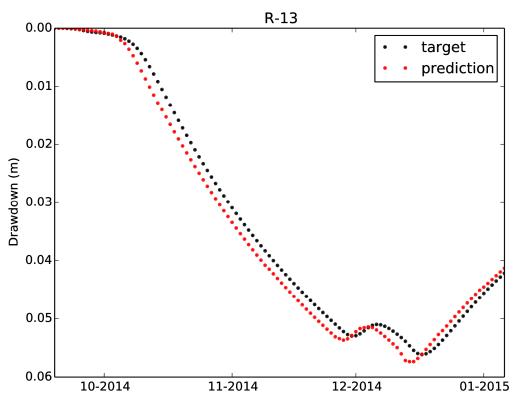


Figure A-6.0-4 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-13 to pumping at CrEX-1

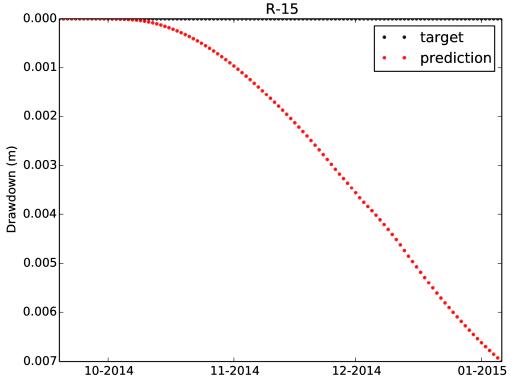


Figure A-6.0-5 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-15 to pumping at CrEX-1

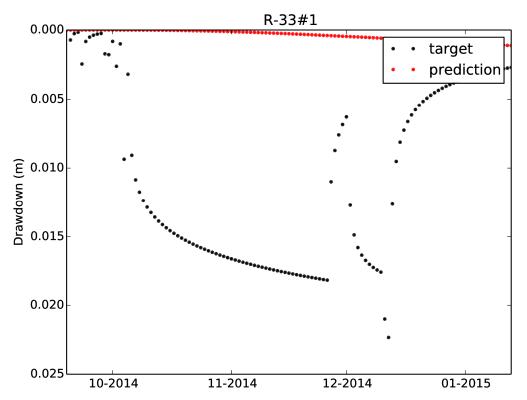


Figure A-6.0-6 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-33 #1 to pumping at CrEX-1

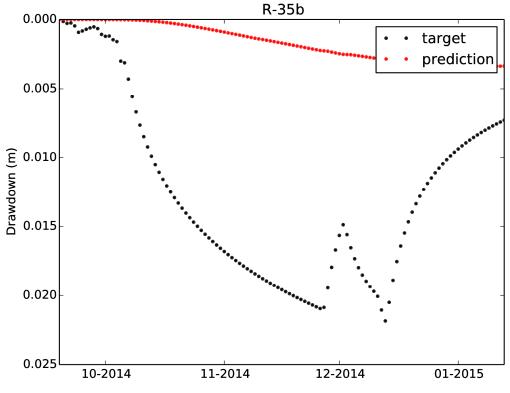


Figure A-6.0-7 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-35b to pumping at CrEX-1

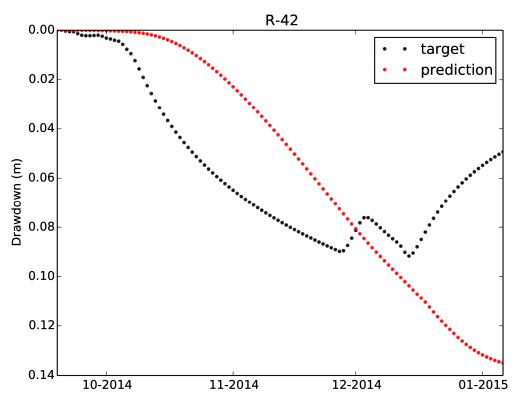


Figure A-6.0-8 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-42 to pumping at CrEX-1

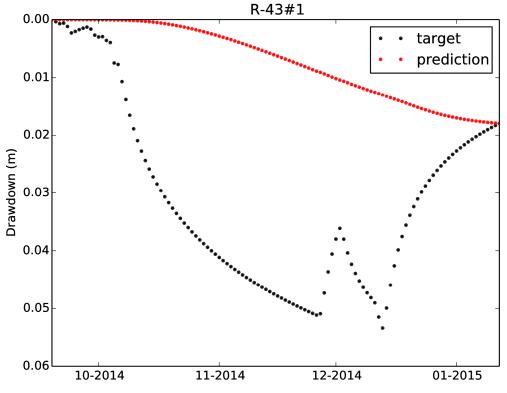


Figure A-6.0-9 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-43 screen 1 to pumping at CrEX-1

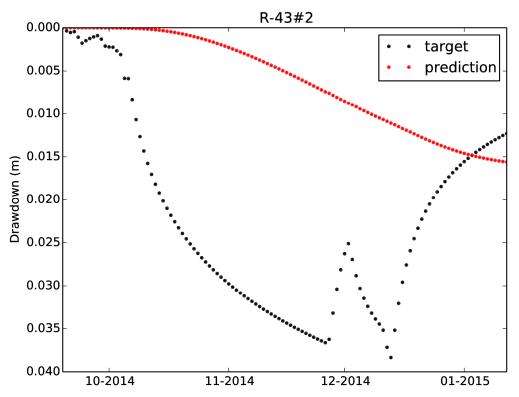


Figure A-6.0-10 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-43 screen 2 to pumping at CrEX-1

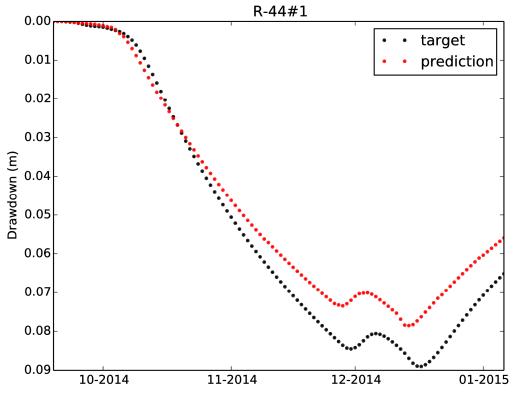


Figure A-6.0-11 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-44 screen 1 to pumping at CrEX-1

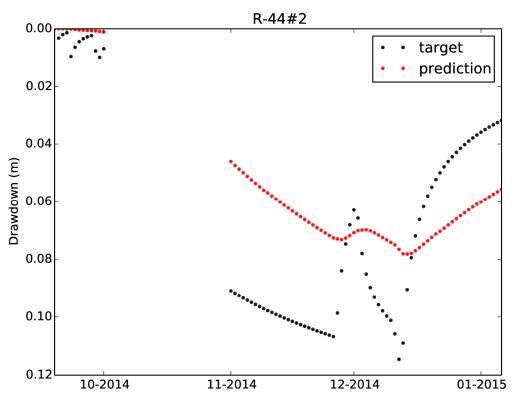


Figure A-6.0-12 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-44 screen 2 to pumping at CrEX-1

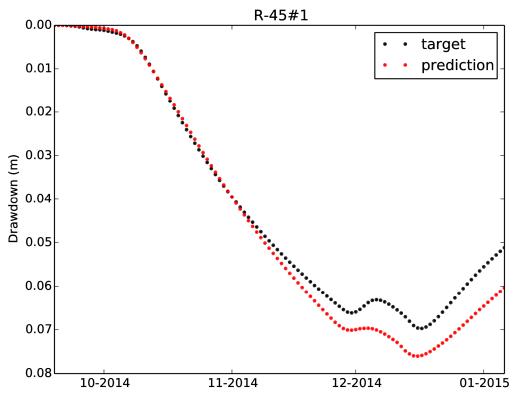


Figure A-6.0-13 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-45 screen 1 to pumping at CrEX-1

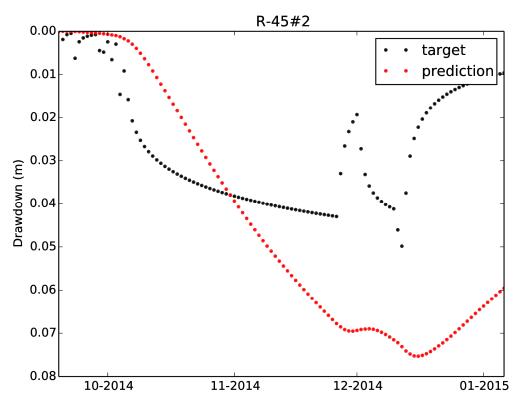


Figure A-6.0-14 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-45 screen 2 to pumping at CrEX-1

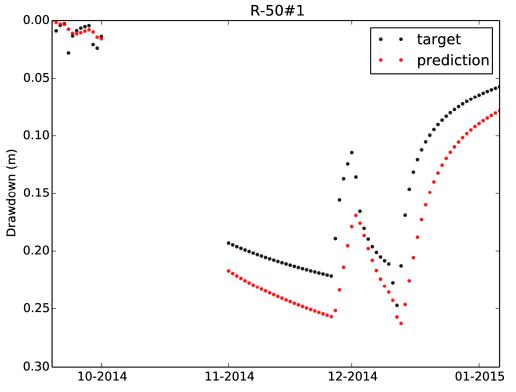


Figure A-6.0-15 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-50 screen 1 to pumping at CrEX-1

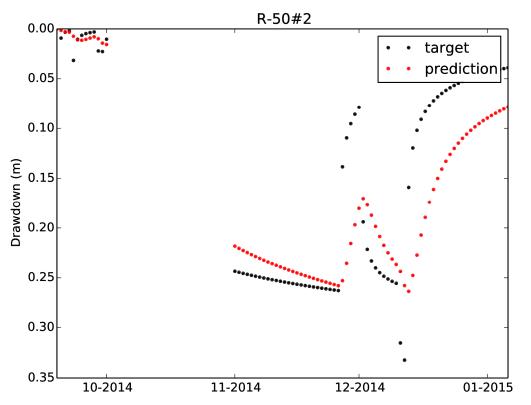


Figure A-6.0-16 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-50 screen 2 to pumping at CrEX-1

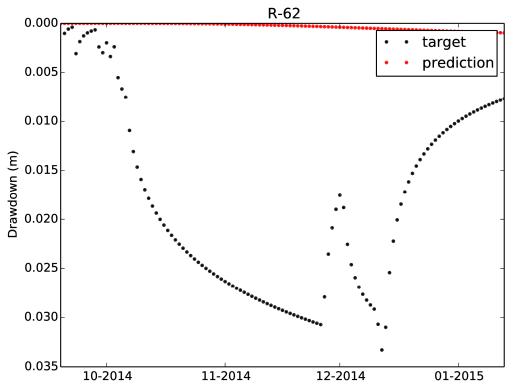
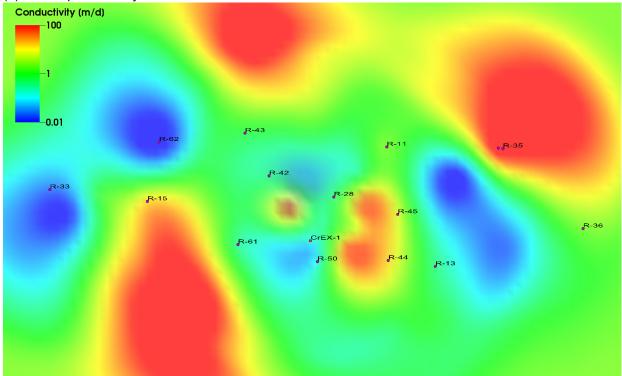
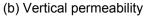
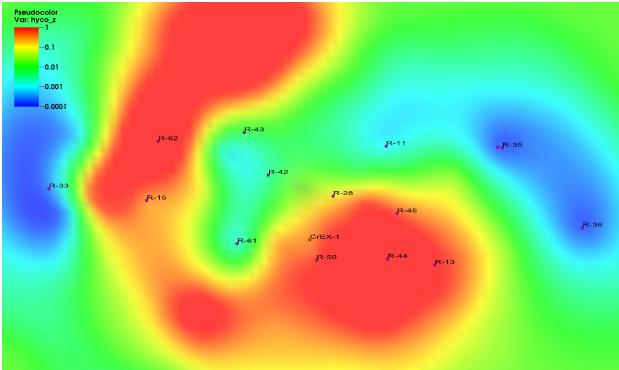


Figure A-6.0-17 Model calibration targets (black dots) and predictions (red dots) for the drawdown at R-62 to pumping at CrEX-1



### (a) Lateral permeability

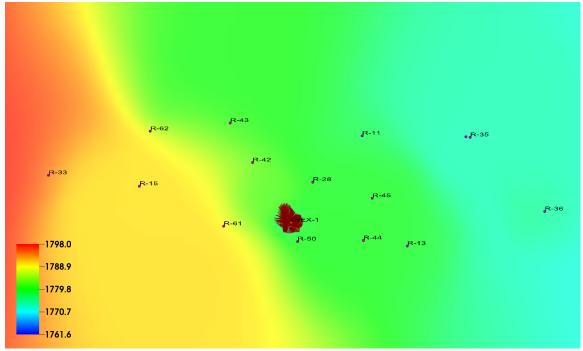




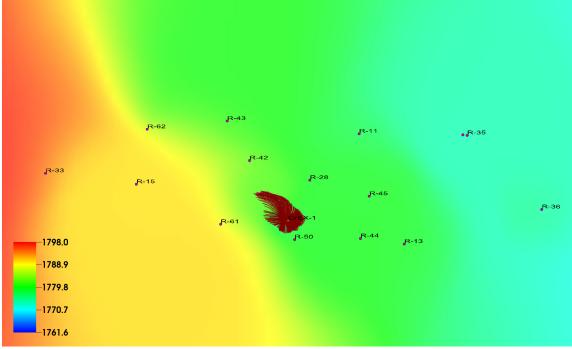
Notes: The inverse model analysis also takes into account the pressure changes observed from municipal water-supply pumping in the nearby groundwater production wells.

### Figure A-6.0-18 Model estimated hydraulic conductivity (lateral and vertical) based on R-28 and CrEX-1 pumping tests

### (a) 1 yr of pumping



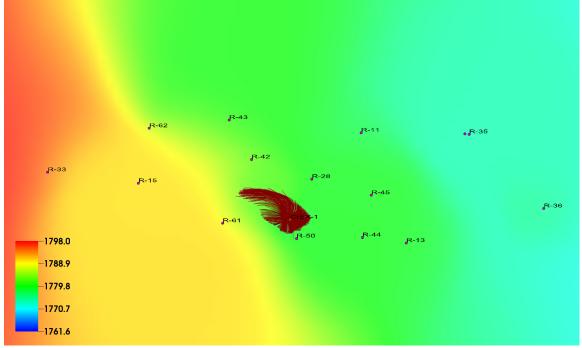
### (b) 3 yr of pumping



Notes: The CZ accounts only for advective groundwater flow; it does not account for diffusion, dispersion and dualporosity effects. Results are preliminary and will be updated with new data from pumping.

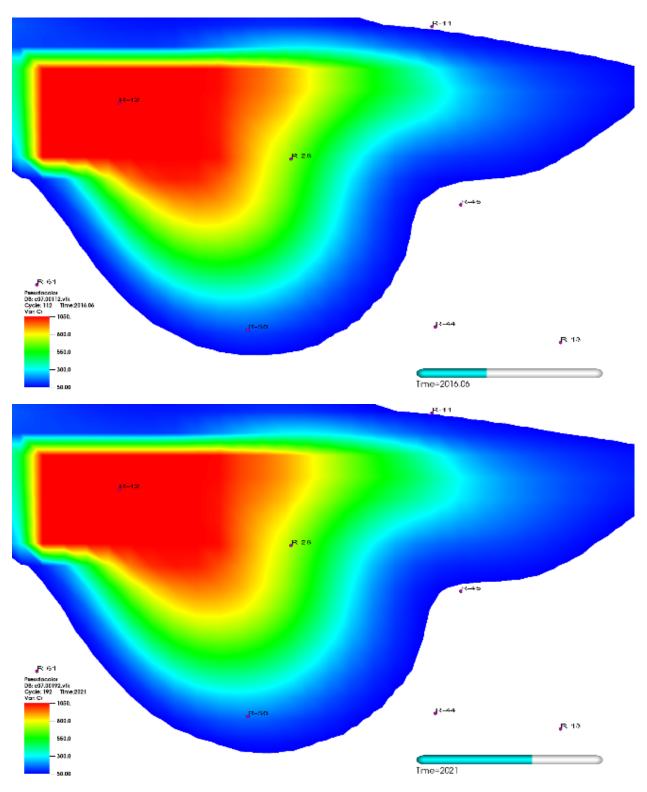
### Figure A-7.0-1 Model predictions of the CrEX-1 CZ after 1, 3 and 5 yr of pumping model predictions using 2014 model update of the 2012 model (Phase II Sandia Investigation Report [LANL 2012, 228624]) accounting for aquifer heterogeneity based on R-28 and CrEX-1 pumping tests

### (c) 5 yr of pumping



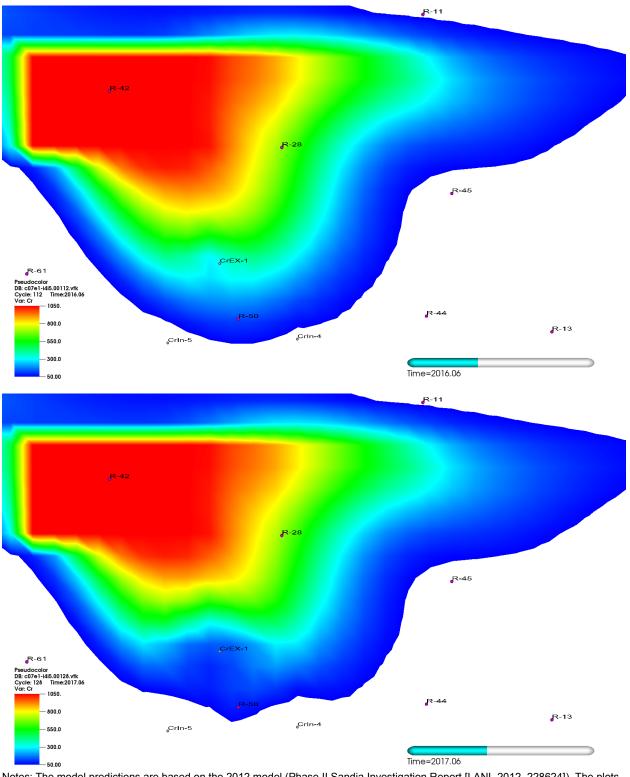
Notes: The CZ accounts for only advective groundwater flow; it does not account for diffusion, dispersion, and dualporosity effects. Results are preliminary and will be updated with new data from pumping.

Figure A-7.0-1 (continued) Model predictions of the CrEX-1 CZ after 1, 3, and 5 yr of pumping model predictions using 2014 model update of the 2012 model (Phase II Sandia Investigation Report [LANL 2012, 228624]) accounting for aquifer heterogeneity based on R-28 and CrEX-1 pumping tests



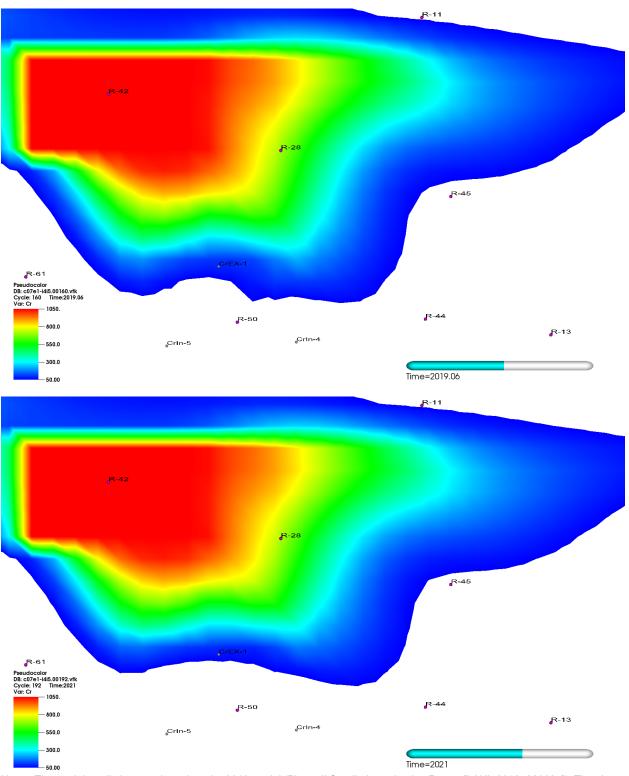
Notes: The model predictions are based on the 2012 model (Phase II Sandia Investigation Report [LANL 2012, 228624]). The results are preliminary and still a work in progress.

## Figure A-8.0-1 Model predictions of the chromium concentrations at 2016 and 2021 without active pumping and injection



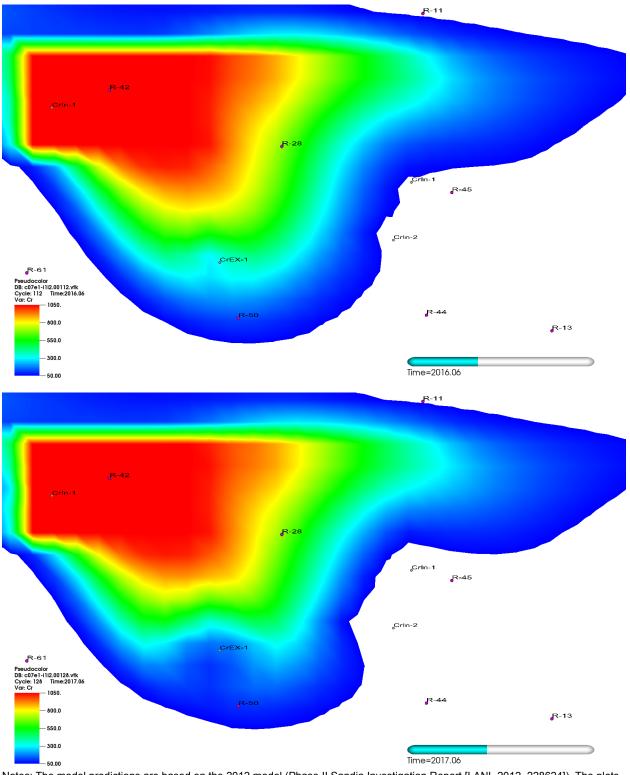
Notes: The model predictions are based on the 2012 model (Phase II Sandia Investigation Report [LANL 2012, 228624]). The plots show model predictions for 2016, 2017, 2019, and 2021 (after 0, 1, 3, and 5 yr of pumping/injection, respectively). The results are preliminary. Here CrEX-1 is pumping at 80 gpm for 5 yr (2016–2021), and CrIN-4 and CrIN-5 are injecting for 5 yr at 40 gpm each (2016–2021).

## Figure A-8.0-2 Model predictions of the impact of pumping and injection scenarios on the chromium concentrations



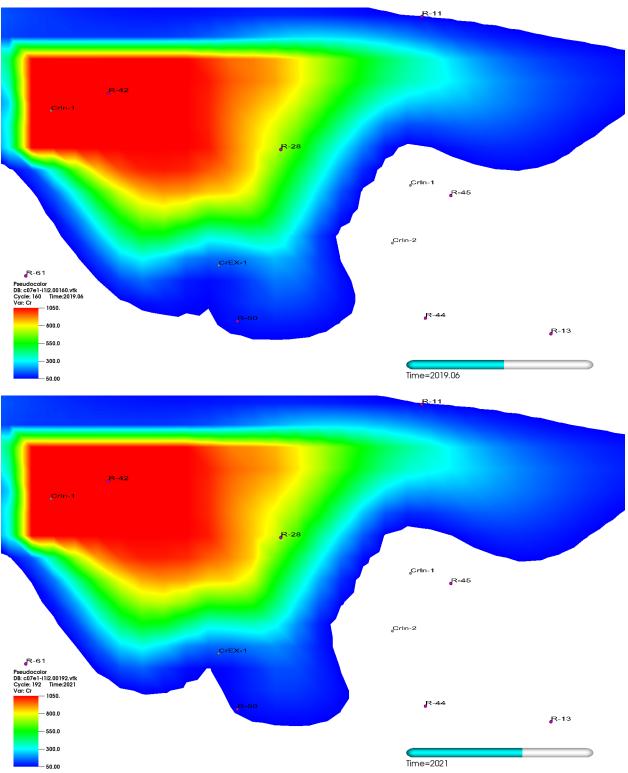
Notes: The model predictions are based on the 2012 model (Phase II Sandia Investigation Report [LANL 2012, 228624]). The plots are showing model predictions for 2016, 2017, 2019, and 2021 (after 0, 1, 3, and 5 yr of pumping/injection, respectively). The results are preliminary. Here CrEX-1 is pumping at 80 gpm for 5 yr (2016–2021), and CrIN-4 and CrIN-5 are injecting for 5 yr at 40 gpm each (2016–2021).

## Figure A-8.0-2 (continued) Model predictions of the impact of pumping and injection scenarios on the chromium concentrations



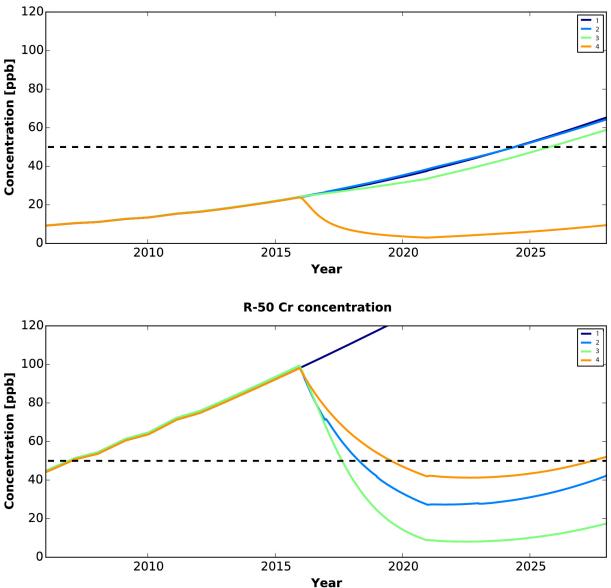
Notes: The model predictions are based on the 2012 model (Phase II Sandia Investigation Report [LANL 2012, 228624]). The plots are showing model predictions at 2016, 2017, 2019, and 2021 (after 0, 1, 3, and 5 yr of pumping/injection, respectively). The results are preliminary. Here CrEX-1 is pumping at 80 gpm for 5 yr (2016–2021), and CrIN-1 and CrIN-2 are injecting for 5 yr at 40 gpm each (2016–2021).

## Figure A-8.0-3 Model predictions of the impact of pumping and injection scenarios on the chromium concentrations



Notes: The model predictions are based on the 2012 model (Phase II Sandia Investigation Report [LANL 2012, 228624]). The plots are showing model predictions at 2016, 2017, 2019, and 2021 (after 0, 1, 3, and 5 yr of pumping/injection, respectively). The results are preliminary. Here CrEX-1 is pumping at 80 gpm for 5 yr (2016–2021), and CrIN-1 and CrIN-2 are injecting for 5 yr at 40 gpm each (2016–2021).

## Figure A-8.0-3 (continued) Model predictions of the impact of pumping and injection scenarios on the chromium concentrations



**R-45 Cr concentration** 

Notes: The dashed line represents 50 ppb chromium concentration. R-45 concentrations are substantially impacted only by the CrIN-3/CrIN-4 injection (see section A-8.0, scenario 4). R-50 concentrations are impacted in all pumping/injection scenarios but the highest impact is when CrIN-1 and CrIN-2 are injecting (scenario 4).

Figure A-8.0-4 Model predicted chromium concentration curves for R-45 screen 1 and R-50 screen 1 under different scenarios: (1) no action; (2) CrEX-1 pumping only; (3) CrEX-1 pumping and CrIN-4/CrIN-5 injecting; and (4) CrEX-1 pumping and CrIN-1/CrIN-2 injecting

Screen	Transmissivity (m²/day)	Storativity (−)	Max drawdown (m)	Comment
CrCH-1	1700	0.06	0.06	Very limited pressure record
R-1	na*	na	>0.01	Difficult to analyze; small drawdown (?)
R-11	750	0.07	0.057	None
R-13	820	0.06	0.056	None
R-15	na	na	na	Potential transducer problems
R-28	na	na	na	Data gaps; difficult to analyze
R-33 #1	na	na	0.023	Difficult to analyze; small drawdown (?)
R-33 #2	na	na	na	Difficult to analyze small drawdown (?)
R-35a	na	na	na	Difficult to analyze; small drawdown (?)
R-35b	na	na	0.022	Difficult to analyze small drawdown (?)
R-36	na	na	na	Difficult to analyze; no drawdown (?)
R-42	820	0.06	0.092	Data gaps; difficult to analyze
R-43 #1	na	na	>0.01	Difficult to analyze; small drawdown (?)
R-43 #2	3100	0.03	0.039	None
R-44 #1	540	0.1	0.089	None
R-44 #2	680	0.06	0.097	None
R-45 #1	780	0.09	0.069	None
R-45 #2	5200	0.007	0.045	None
R-50 #1	540	0.2	0.2	None
R-50 #2	1000	0.01	0.26	None
R-61 #1	1200	0.1	0.06	None
R-61 #2	850	0.1	0.069	None
R-62	4900	0.007	0.034	Data gaps; difficult to analyze

Table A-4.0-1Summary of the Estimated Effective Aquifer Properties betweenthe Pumping (CrEX-1) and Observation Wells during 2014 CrEX-1 Pumping Test

\*na = Not available.



SUSANA MARTINEZ Governor JOHN A. SANCHEZ Lieutenant Governor

### ENCLOSURE 2 NEW MEXICO ENVIRONMENT DEPARTMENT

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RYAN FLYNN Cabinet Secretary BUTCH TONGATE Deputy Secretary

### **CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

October 15, 2015

Doug Hintze, Manager U.S. Department of Energy EM-Los Alamos Field Office, DOE 3747 West Jemez Rd, MS A316 Los Alamos, NM 87544

Michael Brandt, Associate Director Environment, Safety, Health Los Alamos National Laboratory P.O. Box 1663, MS K491 Los Alamos, NM 87545



### RE: APPROVAL WITH MODIFICATIONS INTERIM MEASURES WORK PLAN FOR CHROMIUM PLUME CONTROL LOS ALAMOS NATIONAL LABORATORY EPA ID#NM0890010515 HWB-LANL-15-023

Dear Mr. Hintze and Mr. Brandt:

The New Mexico Environment Department (NMED) is in receipt of the United States Department of Energy (DOE) and the Los Alamos National Security, L.L.C.'s (collectively, the Permittees) document entitled *Interim Measures Work Plan for Chromium Plume Control* (Plan) dated May 2015, referenced by EP2015-0089, and received on May 26, 2015. NMED has reviewed the Plan, and hereby issues this approval with the following comments and modifications.

The Permittee's primary objective, as stated in the Plan, is to rapidly reduce off-site migration of hexavalent chromium (hereafter, Cr) in the regional aquifer by achieving hydraulic control of the leading edge of the Cr plume along the southern facility boundary with Pueblo de San Ildefonso (Pueblo). Specifically, the Permittee's intent is to reduce Cr concentrations at the boundary well R-50 to a level at or below the New Mexico groundwater standard of 50  $\mu$ g/L. To accomplish this objective, the Permittees propose to:

1. Conduct an extended pumping event at the pilot extraction well CrEX-1 during fall of

2015, until ground is frozen, at 80-100 gallons per minute (gpm) with land application of treated groundwater, with a goal of determining the extent and shape of the CrEX-1 capture zone.

- Commence drilling and construction of up to six injection wells (designated CrIN-1 through CrIN-6) in fall 2015, starting with two injection wells southeast (CrIN-4) and southwest (CrIN-5) of R-50, with a goal of having the reinjection infrastructure in place in 2016.
- 3. In 2016, contingent on the Permittees securing a discharge permit for injection wells, begin an extended pumping test at CrEX-1, with reinjection of treated groundwater at CrIN-4 and CrIN-5, with the intent of producing a west to east hydraulic barrier or mound along the property boundary with the Pueblo. Each injection well will receive approximately 40 gpm.
- 4. If the extended pumping at CrEX-1, combined with reinjection, does not result in hydraulic control of the southern edge of the Cr plume, the Permittees will consider installing an additional extraction well (CrEX-2), preliminarily located approximately 800 ft east of CrEX-1. The schedule for making a decision on the need for CrEX-2 is not provided in the Plan but, based on modeling, the Permittees expect to achieve hydraulic control of the plume by the second year of full operation of CrEX-1 with reinjection to CrIN-4 and CrIN-5.

### **Comments:**

The Permittee's proposed Interim Measures (IM) actions are significantly dependent on numerical modeling results as provided in Appendix A of the Plan. NMED is in agreement with the Permittees that many uncertainties exist concerning the modeling results and associated IM actions such as selecting locations for injection wells and performance-monitoring criteria. Numerous examples of these uncertainties can be found in the Plan, such as:

- Section 3.3 Interim Measure Performance, second paragraph, page 4: "Some uncertainty exists in the potential influence of injection on groundwater flow direction in that portion of the plume, but dilution of plume concentrations in that area as a result of injection would likely also result in decreases in chromium concentrations along that potential flow path."
- Section 3.3 Interim Measure Performance, second paragraph, page 4: "There are some uncertainties specifically with respect to how quickly the plume will respond to pumping because the model and the projections shown in Figure 3.3-1 do not yet represent the role that dual porosity may play with respect to the distribution of chromium within the aquifer."

Mr. Hintze and Mr. Brandt October 15, 2015 Page 3

No well a

• Appendix A, Section A-4.0 ANALYSIS OF CrEX-1 PUMPING TEST DATA, first paragraph, page A-3: "Uncertainties associated with estimates of aquifer properties based on the CrEX-1 pumping data are because of the small magnitude of the drawdowns measured in some of the observation wells."

In addition to the above examples concerning the significance of uncertainties in the proposed IM actions, NMED asserts that utilization of input data collected from pumping tests and contaminant monitoring at regional well R-28 in the Permittees' model is not applicable and likely increases the uncertainty of the model. The screened interval at R-28 is positioned approximately 40 to 60 ft below the regional-aquifer water table and, therefore, hydraulic properties data from aquifer tests and contaminant data collected at R-28 most likely do not reflect the upper 50 ft of regional-aquifer where the majority of Cr is present. The recently installed piezometer CrPZ-2b, screened at a depth equivalent to R-28, produced a preliminary Cr result of 19.3  $\mu$ g/L, suggesting that Cr concentrations at the R-28 screened interval are much lower than those present near the water table, and that pumping R-28 is likely drawing groundwater containing higher concentrations of Cr from a zone above the R-28 screen. It should also be noted that, spatially, a large data gap exists within the interior of the plume with respect to delineating Cr distributions, potentially adding to the overall uncertainty in the Permittee's modeling results.

### **Modifications:**

NMED is concerned that the IM actions proposed in the Plan may not be sufficient to meet the Permittee's primary objective as specified in the Plan, *"To rapidly reduce off-site chromium transport in the regional aquifer,"* Some issues of concern include:

- The recently installed regional aquifer piezometer CrPZ-1, located approximately 1,600 ft west-northwest of CrEX-1, produced a Cr concentration of 450  $\mu$ g/L, significantly higher than expected, which suggests that the overall flux of Cr migrating offsite could be more extensive than previously thought;
- increasing levels of Cr at the boundary well R-50, already at approximately twice the New Mexico groundwater standard; and
- the proximity of the Cr plume to Los Alamos County production well PM-4, with the possibility of the well becoming vulnerable to contamination.

In NMED's opinion, at least one additional boundary extraction well and at least three boundary injection wells <u>may</u> be needed to achieve the Permittee's primary objective to control the migration of Cr offsite. NMED's opinion is based on the lack of sufficient spatial characterization of Cr concentrations, hydraulic heads and permeability in the upper portion of the regional-aquifer, as well as substantial uncertainties in the Permittees' understanding of the influence of apparent strong aquifer heterogeneity and vertical anisotropy on the capture and removal of Cr along the property boundary. Following the CrEX-1 and CrEX-3 (proposed in: LANL, EP2015-0127) pumping tests to be conducted in 2016, the Permittees must analyze all available data to determine hydraulic responses, capture zones, aquifer properties and, if possible, changes in contaminant gradients. The intent is to determine if additional extraction

#### ENCLOSURE 2

Mr. Hintze and Mr. Brandt October 15, 2015 Page 4

and/or injection wells, as well as additional monitoring points, are needed in the vicinity of the property boundary to mitigate contaminant migration and to monitor performance of the IM. Excluding any unanticipated circumstances, the Permittees must initiate the CrEX-1 and CrEX-3 pumping test no later than May 1, 2016 and submit a summary aquifer test report specific to the CrEX-1 and CrEX-3 pumping-test results and findings no later than November 30, 2016. The summary report must include recommendations as to whether additional extraction or injection wells and/or IM performance monitoring points are needed and, if so, proposed locations for the recommended wells.

The Permittees must obtain prior approval from NMED for drill-site locations and drilling sequences for all extraction and injection wells.

If proposed boundary injection wells CrIN-3, CrIN-4, and CrIN-5 cannot be installed due to unanticipated circumstances, the Permittees must install the injection wells at alternate location(s) such as west and/or east of the chromium plume.

The Permittees must submit drilling work plan(s) for the installation of injection wells CrIN-1 through CrIN-5 and any other injection wells associated with CrEX-1 and CrEX-3 no later than **December 31, 2015**.

Please contact Michael Dale at (505) 476-3078 if you have questions.

Sincerely, ohn E. Kieling Chief

- Hazardous Waste Bureau
- cc: D. Cobrain, NMED HWB
  N. Dhawan, NMED HWB
  B. Wear, NMED HWB
  J. Kulis, NMED HWB
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  S. Yanicak, NMED DOE OB, MS M894
  L. King, EPA 6PD-N
  R. Martinez, San Ildefonso Pueblo
  D. Chavarria, Santa Clara Pueblo
  C. Rodriguez, DOE-EM-LA, MS A316
  J. Buckley, ENV-CP, MS K490

File: Reading and LANL 2015, Chromium Plume

LA-UR-15-24861 July 2015 EP2015-0127

# Work Plan for Chromium Plume Center Characterization



### ENCLOSURE 2

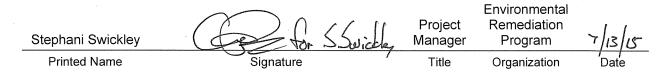
Prepared by the Environmental Programs Directorate

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## Work Plan for Chromium Plume Center Characterization

July 2015

Responsible project manager:



Responsible LANS representative:

Randall Erickson	fra 2	Fork	ERICISON	Acting Associate Director	Environmental Programs	7/13/15
Printed Name	Sigr	nature		Title	Organization	Date
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Christine Gelles	('Mt	Kh	$\smile$	Acting Manager	DOE-EM-LA	7/28/15
Printed Name	Sigr	iature)		Title	Organization	Date
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### ENCLOSURE 2

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### ENCLOSURE 2

### 1.0 INTRODUCTION

This work plan for chromium plume center characterization describes proposed activities to be conducted by Los Alamos National Laboratory (LANL or the Laboratory) to further investigate the aquifer in the area of highest known concentrations (center) of the chromium plume and to further characterize the nature and extent of chromium (and related) contamination (Figure 1.0-1). Results from the plume center characterization work will be included in a corrective measures evaluation report.

The work presented in this plan follows from the "Interim Measures Work Plan for the Evaluation of Chromium Mass Removal," submitted to the New Mexico Environment Department (NMED) in April 2013 (LANL 2013, 241096). That work plan was prepared in response to requirements in a letter from NMED dated January 25, 2013 (NMED 2013, 521862), which directed the Laboratory to prepare an interim measures work plan to assess the potential for active long-term removal of chromium from the regional aquifer via pumping with a pilot extraction test well. The "Interim Measures Work Plan for Chromium Plume Control" (LANL 2015, 600458) that proposed hydraulic control to address plume migration was submitted to NMED in May 2015. This work plan supplements that document and the NMED's requirements by proposing an investigation of the potential for active long-term removal of chromium from the regional aquifer. Some of the investigations proposed in this work plan follow from the scope and objectives proposed in the "Drilling Work Plan for Chromium Project Coreholes" (LANL 2014, 259151).

Investigations and conceptual models related to chromium contamination are summarized in a number of reports, including the "Investigation Report for Sandia Canyon" (LANL 2009, 107453) and the "Phase II Investigation Report for Sandia Canyon" (LANL 2012, 228624).

Additional information presented in the "Summary Report for the 2013 Chromium Groundwater Aquifer Tests at R-42, R-28, and SCI-2" (LANL 2014, 255110) inform the technical recommendations in this report. Figure 1.0-1 shows the current extent of the plume defined by the 50 ppb New Mexico groundwater standard.

### 2.0 OBJECTIVES

The scope of this work plan addresses four objectives.

The first objective is to investigate the feasibility of chromium source removal from the center of the plume (as defined as the portion of the plume with the highest chromium concentrations). It is apparent from previous aquifer tests in groundwater monitoring wells R-28 and R-42 that chromium mass can be readily removed from the centroid even at relatively low pumping rates (R-42 was pumped at 8 gallons per minute [gpm]; R-28 was pumped at approximately 28 gpm) (Figure 2.0-1). However, chromium concentrations decreased substantially and rapidly during the several-week pumping period at both wells (Figure 2.0-2). This investigation proposes (1) to further evaluate the potential for optimizing chromium mass removal, (2) to determine the geochemical transients during pumping and recovery, (3) to investigate the potential for decline in chromium concentrations during pumping and rebound after pumping stops, and (4) to assess what optimal well configuration, well design, and operational mode are required for mass removal within the aquifer as one or more components of a final remedy for the plume.

A second objective is to further characterize key attributes of the aquifer, including heterogeneity and dual porosity principally for the purpose of evaluating potential in situ remedial strategies for the plume. This objective will be addressed with (1) aquifer dilution-tracer tests, and (2) field-scale cross-hole tracer tests, and (3) field-scale deployment of a pilot field test to evaluate potential in situ remediation approaches.

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The data from these studies will be used to refine the groundwater models of aquifer flow and contaminant transport properties (heterogeneity, dual porosity, etc.) and associated uncertainties related to possible remediation approaches.

A third objective is to study the hydrologic and geochemical conditions that may occur within and adjacent to proposed injection wells as discussed in the "Interim Measures Work Plan for Chromium Plume Control" (LANL 2015, 600458). This objective will be addressed with field studies to evaluate the hydrogeologic and geochemical conditions that may evolve within and around injection points and that may adversely impact injection efficiency. These data will help optimize approaches to routine or required maintenance of injection wells.

A fourth objective is to characterize the infiltration beneath the shallow alluvial groundwater in Sandia Canyon. Based on the current conceptual model most of the historical and present-day infiltration occurs within that zone (LANL 2012, 228624). This objective will be addressed by installing and monitoring a series of piezometers within the primary infiltration area in Sandia Canyon.

### 3.0 INVESTIGATION APPROACH

### 3.1 Investigation of Source Removal

A location for an extraction well, CrEX-3, is proposed to investigate the potential for optimizing removal of chromium from the plume center (Figure 1.0-1). The location, south of R-28, is within a zone of expected high hydraulic conductivity that appears to be relatively continuous from R-11 southward towards CrEX-1 and possibly the deeper zone monitored by R-50, screen 2. The initial design for CrEX-3 consists of an 8-in. casing diameter with a 40-slot screen placed within 35–40 ft of the water table. Data from sampling conducted during sonic drilling in CrCH-2 and from piezometers CrPZ-2a and CrPZ-2b installed within the CrCH-2 corehole (LANL 2015, 600457) indicate contamination in the R-28 area is primarily within an interval zone approximately 30 ft below the aquifer water table (Figure 3.1-1). Thus, the extraction well is proposed to be screened in that same zone near the water table to optimize removal of the contaminant source. The decreases in chromium concentrations and subsequent rebound observed in R-28 during the 87-d pumping test may indicate that under ambient flow or routine sampling conditions (e.g., pumping of only approximately 3 casing volumes), R-28 predominantly receives groundwater flow from the upper portion of its screen and filter pack where the contaminant concentration is highest (Figure 3.1-1). But during extended pumping, the proportion of water entering the well from the less contaminated deeper zone increases, resulting in progressively decreasing concentrations in R-28 (Figure 2.0-2b). Therefore, the CrEX-3 screen is proposed to target that upper zone.

Hydraulic testing conducted for 87 d at R-28 propagated a zone of influence that extended upgradient into the highest known areas of contamination near R-42 but did not result in a significant pressure response at R-42 (Figure 3.1-2) (LANL 2014, 255110). This might be because of (1) a hydraulic boundary (e.g., stratification or channeling) that may exist between the wells or (2) active infiltration recharge near R-42 that may dampen the drawdown impacts (LANL 2014, 255110). Figure 3.1-3 is a cross-section line between R-62 and R-45 that shows the water table and plume span the contact between the overlying Puye Formation (Tpf) and underlying Miocene Pumiceous unit (Tjfp). This contact may be a factor in the potential boundary effects apparent between the R-28 area and R-42.

Continuous pumping at CrEX-3 for extended periods of time will provide key information about the heterogeneity of the aquifer in the plume center and the nature and orientation of a well-established capture zone. All monitoring wells in the chromium monitoring group and newly installed piezometers will have continuous pressure monitoring to evaluate the capture zone established by pumping at CrEX-3.

Additionally, samples will be collected periodically to analyze key plume constituents including chromium, nitrate, sulfate, and tritium to evaluate potential transients in the data. Pumping will likely begin at maximum rates achievable at CrEX-3 and will be reduced incrementally if chromium concentrations begin to decline significantly. The overall goal is to find the operational approach that achieves the greatest mass per gallon removed. Testing that was conducted at R-28 and R-42 showed that because of the higher hydraulic conductivities present in the R-28 area, greater overall mass removal was possible in the R-28 area even though concentrations are approximately half of what they are at R-42. In addition, if the capture zone can be established in the areas of the plume with the highest concentrations, the CrEX-3 location may be very efficient for capturing groundwater from the center portion of the plume with the highest known concentrations.

### 3.2 Aquifer Characterization and Evaluation of Potential Remediation Approaches

Aquifer (dilution) tracer tests and a field cross-hole tracer study are proposed to provide data to guide potential future field investigations that would support the development of remedial alternatives. Dilution tracer (aquifer) tests will be conducted at newly installed piezometers CrPZ-2a, CrPZ-2b, CrPZ-3, and at R-50 before pumping starts at CrEX-1. An additional dilution tracer test will then be conducted at R-50 late in the pumping period at CrEX-1 to evaluate the influence of CrEX-1 pumping on flow rates in the R-50 area. These data will be compared with flow-rate estimates derived from long-term pumping data from CrEX-1.

For the cross-hole test, piezometers CrPZ-3, CrPZ-2a, and CrPZ-2b will be used to deploy paired conservative tracers with different diffusion coefficients to enhance the potential for seeing different breakthrough behaviors that will be indicative of dual porosity in the aquifer. This information, in conjunction with transient contaminant data from pumping at CrEX-1 and CrEX-3, will be helpful for characterizing the spatial distribution of chromium (and related contaminants) in the aquifer.

The tracers will be monitored at R-42 for tracers used at CrPZ-3 and at R-28, CrEX-3, and CrEX-1 for tracers introduced at the CrPZ-2a and CrPZ-2b. The initial tracer mass that will be introduced will be determined to enhance the probability of detection in nearby downgradient wells. Active pumping at CrEX-3, and possibly CrEX-1, is expected to reduce the travel times between the introduction points and the monitored wells. Specific details of the dilution and cross-hole tracer tests are included in a notice of intent (NOI) to the NMED Groundwater Quality Bureau (GWQB).

After the hydrologic information from the cross-hole tracer tests is available, the Laboratory proposes to conduct an in situ field pilot treatability test. In situ approaches generally involve the use of amendments directly within the aquifer either to favorably alter the geochemistry of the contaminants or to enhance naturally occurring biological processes that favorably alter groundwater contaminants. The specific approach will be proposed at a later date after the cross-hole and bench-scale treatability data are available.

### 3.3 Injection-Well Study

A study will be conducted to investigate potential hydrologic and/or geochemical conditions that may develop in and surrounding an injection well used for dispositioning treated groundwater pumped from CrEX-3 and from CrEX-1 under the "Interim Measures Work Plan for Chromium Plume Control" (LANL 2015, 600458).

The approach will involve using column experiments at either CrEX-1 or CrEX-3. Treated water will be continuously injected into columns packed with aquifer sediments obtained from the sonic corehole

drilling campaign or from other representative regional aquifer materials (Figure 3.3-1). Permeability and geochemistry will be measured from column effluent to gather data that may be useful for troubleshooting and maintenance of operational injection wells. Two duplicate sequential column flow systems will be set up in the field near a treated water source to use as the feed to the columns. The first column in each duplicate sequence will be 2-in. in diameter and 1-ft long and will be packed with typical well filterpack material. A second column in each sequence will be 5-in. in diameter and 5-ft long and will be packed with representative aquifer materials. Opaque columns and flow tubing will be used to avoid algae growth within the columns. For the 2-in.-diameter column, this flow will result in an entrance velocity of about 3 cm/min across the full cross-section of the column. This entrance velocity is equivalent to what would be observed across a 60-ft-long screen in a 10-in.-diameter casing flowing at 115 gpm (with uniform flow across the entire screen). The actual linear velocity within the column will be about 6 cm/min if the porosity is 50% and 12 cm/min if the porosity is 25%. Velocities are directly proportional to gallons per minute and inversely proportional to both screen length and diameter. For the 5-in.-diameter column, the linear entrance flow velocity will be about 0.5 cm/min, which translates to a 1 cm/min linear velocity in a 50% porosity column and 2 cm/min in a 25% porosity column. The two columns will approximate the linear flow rates expected in the filter pack (first column) and in the formation near the well bore (second column) of an injection well, although true radial flow will not be approximated. The mean water residence times in the two columns, assuming a 30% porosity, is as follows: in the 2-in.-inside diameter (I.D.) column approximately 3 min, and in the 5-in.-I.D. column approximately 100 min. The goal will be to keep the flow rates as continuous and constant as possible for a long period of time and monitor (1) pressure increases across the columns and (2) geochemical and biogeochemical changes in the water exiting each of the columns as a function of time. The system will be monitored for potential problems, such as a significant permeability decrease or plugging, and will attempt to determine the cause and remedies for these problems (either physical, geochemical, or both).

### 3.4 Characterization of Infiltration beneath Lower Sandia Canyon

A series of new alluvial piezometers are proposed for installation in a section of lower Sandia Canyon where it is believed that the majority of historical and present-day infiltration occurs. Some information on infiltration (i.e., seepage velocities) is available from piezometer studies presented in the "Sandia Canyon Investigation Report" (LANL 2009, 107453). The overall objective of the piezometer configuration will be to evaluate the integrated area of infiltration over the portion of the canyon highlighted in Figure 3.4-1. The specific design of the new piezometer array will be proposed in a separate work plan, but the general approach will be to obtain pressure data at varying depths throughout the saturated portion of the alluvium shown in Figure 3.4-1. Pressure data will be used to refine the current hydrologic model for infiltration of effluent and other surface water sources in Sandia Canyon. The data will also be used to establish a baseline to compare with potential future changes that may occur either because of operational changes in effluent volumes or future remediation strategies that may include discharge of treated groundwater to Sandia Canyon above the infiltration zone monitored by the piezometers. The estimated maximum depth for the piezometers will be approximately 40 ft, so drilling will probably be accomplished with auger drilling or by drive-points.

### 3.5 Treatment System Description

Groundwater extracted from the plume-center pumping well will be treated near the well and injected in the same injection wells used for the "Interim Measures Work Plan for Chromium Plume Control" (LANL 2015, 600458). The overall pumping, treatment, and injection system will consist of CrEX-1, CrEX-3, a treatment system, and ultimately of six injection wells (Figure 1.0-1). This system and the operational mode are subject to approval by NMED-GWQB. Once fully operational, the system will run continuously

with pumped groundwater treated at the surface and delivered to injection wells via piping. The treatment unit is likely to be sited at each extraction location to minimize the distance contaminated groundwater is conveyed via piping. Two ion-exchange vessels will operate in series to treat groundwater extracted from CrEX-3 (and CrEX-1, which may be operating at the same time and will have its own treatment system). The first vessel removes up to 99% of the chromium (and nitrate), and the second vessel is used for redundancy and polishing. Water quality in the treatment stream will be monitored in accordance with an NMED-approved discharge permit to ensure water land-applied or dispositioned via reinjection will meet the criteria set forth in the permit(s).

When the injection wells are operational, computerized systems will be in place to monitor injection rates into the wells to ensure that systems are operating as designed. The flow rate of injected water will be monitored, and pressure at each injection well will be maintained at a design level. Water levels in all injection wells will be monitored by a control system with system shutdown mechanisms in place. Each injection well will also be equipped with a submersible pump to allow each well to be periodically back-flushed for maintenance. The approved discharge permit will also include contingencies for failures in any part of the treatment and discharge system. In the absence of an injection-well permit, treated water will be land-applied in accordance with a separate discharge permit and the system will operate at a lesser removal volume because of limitations in land application.

### 4.0 SCHEDULE

Implementation of this work scope, namely the installation of CrEX-3, depends on finalizing the National Environmental Policy Act (NEPA) Environmental Assessment (EA). The NEPA EA is currently expected to be completed in the fall of 2015. Following the installation of CrEX-3, near-term pumping will still depend on the Laboratory's receiving a discharge permit or temporary permission from NMED for land application of treated water and a Change in Point of Diversion permit for well pumping from the New Mexico Office of the State Engineer (NMOSE). NMED received comments on the Laboratory's permit application for the land-application discharge permit (DP-1793) during the second public notice period. A final draft of the permit was issued by NMED on May 28, 2015, but a second request for public hearing was submitted to the NMED on June 15, 2015 by Citizens for Clean Water (CCW 2015, 600514). A permit application to use the injection wells was submitted to the NMED-GWQB on April 9, 2015. An additional permit is required from NMOSE to allow pumping from CrEX-3 and CrEX-1. The Laboratory's goal is to have injection wells in place and permitted in 2016 to enable pumping and injection of water from CrEX-3 and CrEX-1 (LANL 2015, 600458).

Activities related to characterization of the sonic core material are underway. The field tracer studies and the injection well study also depend on the Laboratory's receiving permits with the NMED-GWQB, but it is expected that the field activities will be closely integrated with pumping schedules to optimize data collection.

### 5.0 MANAGEMENT OF INVESTIGATION-DERIVED WASTE

Investigation-derived waste will be managed in accordance with EP-DIR-SOP-10021, Characterization and Management of Environmental Programs Waste. This standard operating procedure incorporates the requirements of applicable U.S. Environmental Protection Agency and NMED regulations, U.S. Department of Energy orders, and Laboratory requirements. The primary waste streams include development water, drill cuttings, drilling fluid, decontamination fluids, and contact waste.

### 6.0 REFERENCES

The following list includes all documents cited in this plan. Parenthetical information following each reference provides the author(s), publication date, and ER ID or ESH ID. This information is also included in text citations. ER IDs were assigned by the Environmental Programs Directorate's Records Processing Facility (IDs through 599999), and ESH IDs are assigned by the Environment, Safety, and Health (ESH) Directorate (IDs 600000 and above). IDs are used to locate documents in the Laboratory's Electronic Document Management System and, where applicable, in the master reference set.

Copies of the master reference set are maintained at the NMED Hazardous Waste Bureau and the ESH Directorate. The set was developed to ensure that the administrative authority has all material needed to review this document, and it is updated with every document submitted to the administrative authority. Documents previously submitted to the administrative authority are not included.

- CCW (Communities for Clean Water), June 15, 2015. "CCW Comments about May 28, 2015 draft DP-1793 for Los Alamos National Laboratory Groundwater Projects," Communities for Clean Water letter to S. Huddleson (NMED-GWQB) from J. Arends, K. Sanchez, B. Tsosie-Peña, M. Naranjo, R. Conn, J. Brown, and M. Perrotte, Santa Fe, New Mexico. (CCW 2015, 600514)
- LANL (Los Alamos National Laboratory), October 2009. "Investigation Report for Sandia Canyon," Los Alamos National Laboratory document LA-UR-09-6450, Los Alamos, New Mexico. (LANL 2009, 107453)
- LANL (Los Alamos National Laboratory), September 2012. "Phase II Investigation Report for Sandia Canyon," Los Alamos National Laboratory document LA-UR-12-24593, Los Alamos, New Mexico. (LANL 2012, 228624)
- LANL (Los Alamos National Laboratory), April 2013. "Interim Measures Work Plan for the Evaluation of Chromium Mass Removal," Los Alamos National Laboratory document LA-UR-13-22534, Los Alamos, New Mexico. (LANL 2013, 241096)
- LANL (Los Alamos National Laboratory), March 2014. "Summary Report for the 2013 Chromium Groundwater Aquifer Tests at R-42, R-28, and SCI-2," Los Alamos National Laboratory document LA-UR-14-21642, Los Alamos, New Mexico. (LANL 2014, 255110)
- LANL (Los Alamos National Laboratory), July 2014. "Drilling Work Plan for Chromium Project Coreholes," Los Alamos National Laboratory document LA-UR-14-24829, Los Alamos, New Mexico. (LANL 2014, 259151)
- LANL (Los Alamos National Laboratory), May 2015. "Interim Measures Work Plan for Chromium Plume Control," Los Alamos National Laboratory document LA-UR-15-23126, Los Alamos, New Mexico. (LANL 2015, 600458)
- LANL (Los Alamos National Laboratory), May 2015. "Completion Report for Chromium Project Coreholes 1 through 5," Los Alamos National Laboratory document LA-UR-15-23197, Los Alamos, New Mexico. (LANL 2015, 600457)
- NMED (New Mexico Environment Department), January 25, 2013. "Response, Proposal to Submit Interim Measures Work Plan for Chromium Contamination in Groundwater," New Mexico Environment Department letter to P. Maggiore (DOE-LASO) and J.D. Mousseau (LANL) from J.E. Kieling (NMED-HWB), Santa Fe, New Mexico. (NMED 2013, 521862)

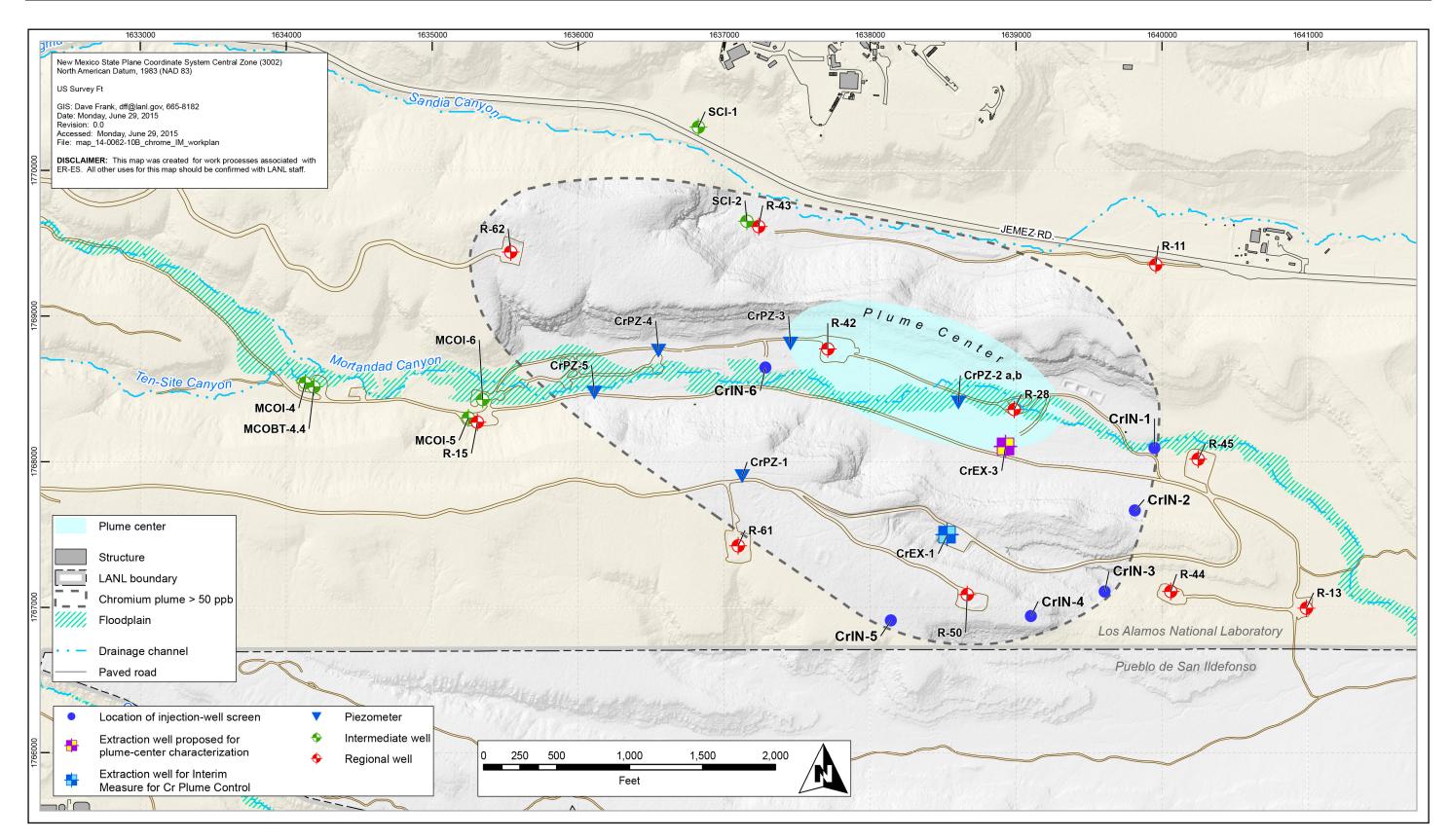
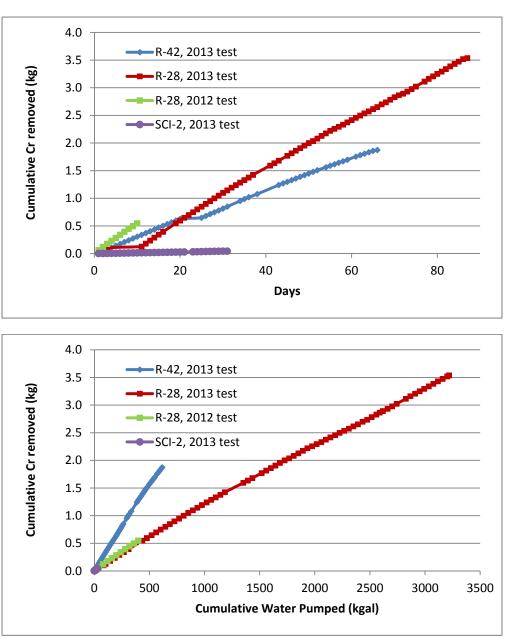
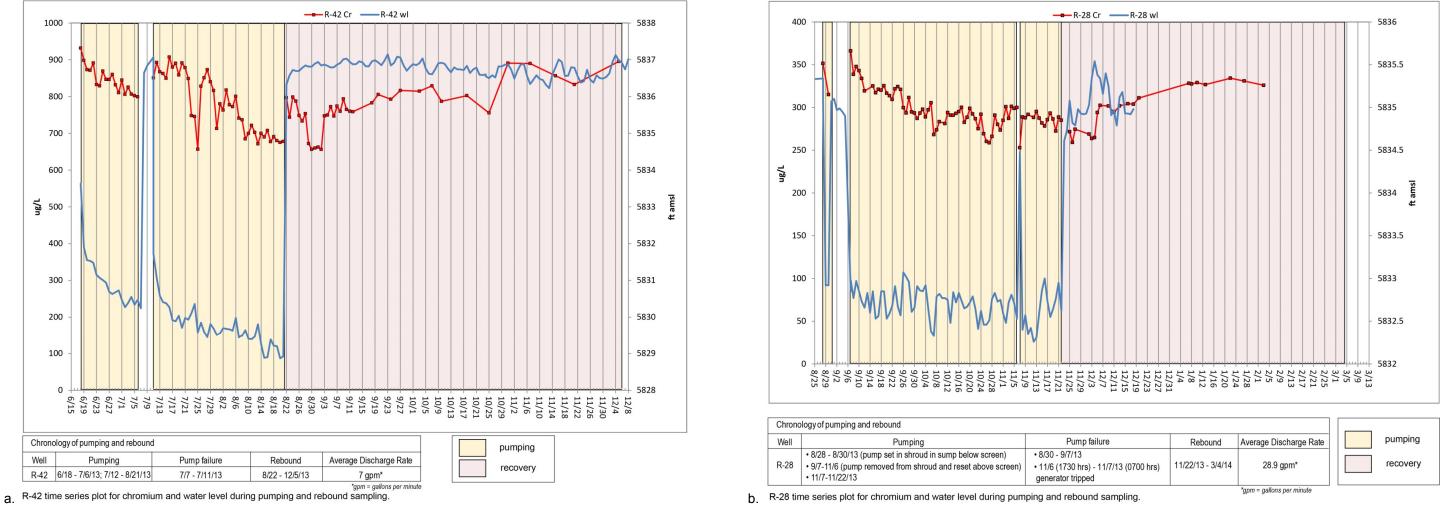


Figure 1.0-1 Current extent of the chromium plume and proposed location of the extraction well for plume center characterization



Notes: The top graph shows chromium mass removal as a function of days of pumping. The bottom graph shows chromium mass removal as a function of gallons pumped.

#### Figure 2.0-1 Cumulative chromium removal during 2014 pumping at R-28, R-42, and SCI-2



Note: The first graph shows R-42; the second graph shows R-28.

Figure 2.0-2 Graphs showing transient concentrations of chromium during extended pumping periods and during recovery (nonpumping) period

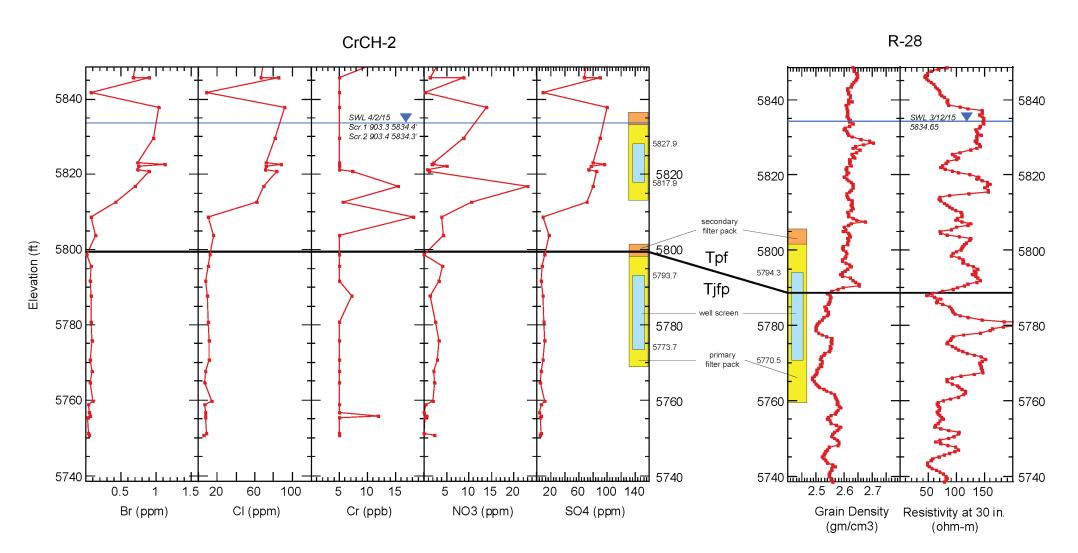
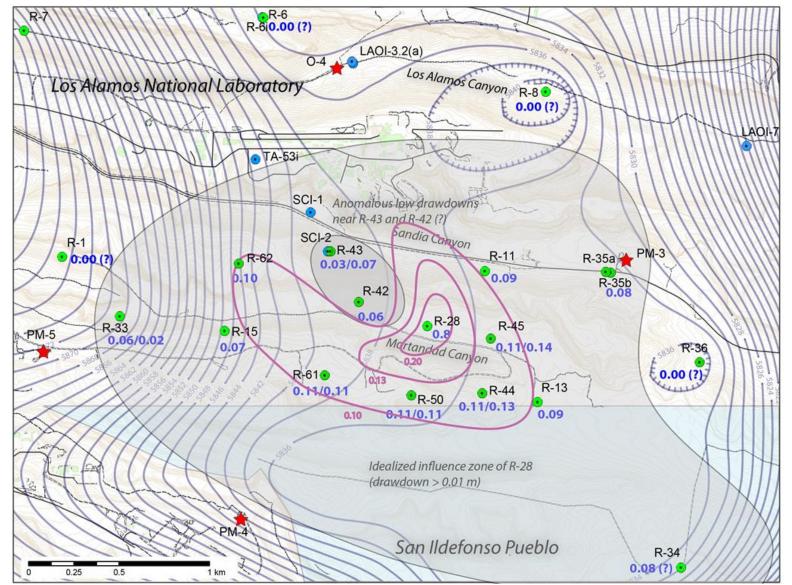
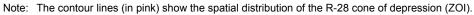
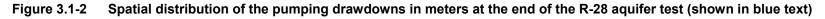


Figure 3.1-1 Concentration profile for representative constituents in CrCH-2 and relation to nearby R-28

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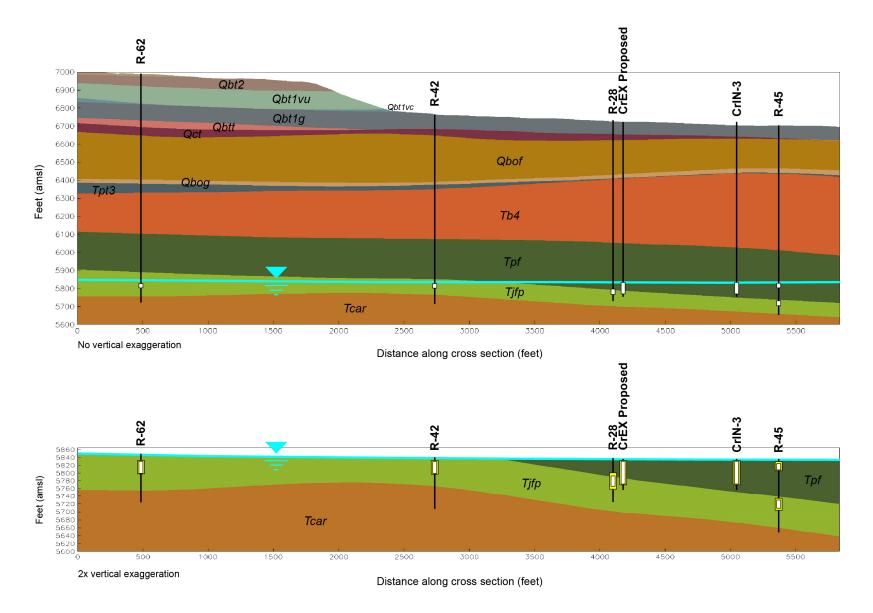


Figure 3.1-3 Cross-section line between R-62 and R-45

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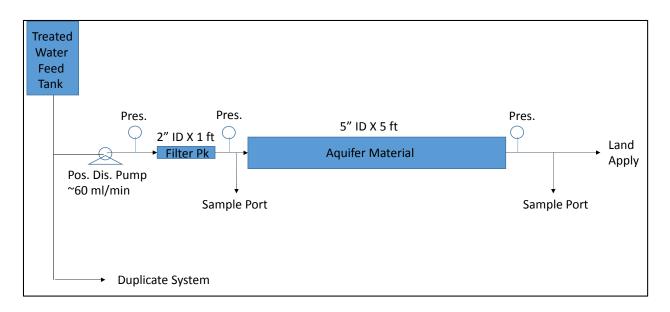
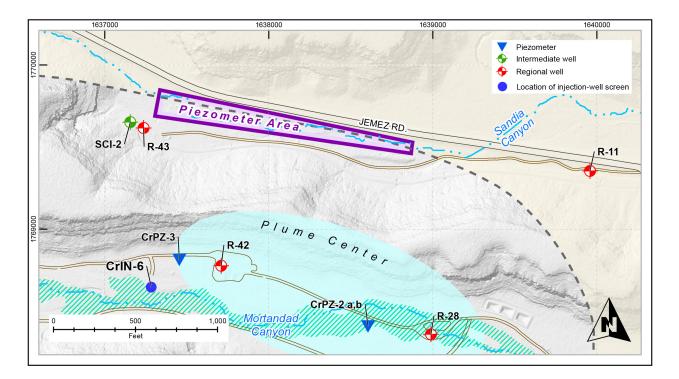


Figure 3.3-1 Conceptual design for injection well column study



#### Figure 3.4-1 General location for shallow alluvial piezometer nests in lower Sandia Canyon

ESHID-600958



SUSANA MARTINEZ Governor JOHN A. SANCHEZ Lieutenant Governor

#### ENCLOSURE 2 NEW MEXICO ENVIRONMENT DEPARTMENT

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RYAN FLYNN Cabinet Secretary BUTCH TONGATE Deputy Secretary

#### **CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

October 15, 2015

Doug Hintze, Manager U.S. Department of Energy EM-Los Alamos Field Office, DOE 3747 West Jemez Rd, MS A316 Los Alamos, NM 87544

Michael Brandt, Associate Director Environment, Safety, Health Los Alamos National Laboratory P.O. Box 1663, MS K491 Los Alamos, NM 87545



### RE: APPROVAL WITH MODIFICATIONS WORK PLAN FOR CHROMIUM PLUME CENTER CHARACTERIZATION LOS ALAMOS NATIONAL LABORATORY EPA ID#NM0890010515 HWB-LANL-15-036

Dear Mr. Hintze and Mr. Brandt:

The New Mexico Environment Department (NMED) is in receipt of the United States Department of Energy (DOE) and the Los Alamos National Security, L.L.C.'s (collectively, the Permittees) document entitled *Work Plan for Chromium Plume Center Characterization* (Plan) dated July 2015, referenced by EP2015-0127, and received on July 28, 2015. NMED has reviewed the Plan, and hereby issues this approval with the following modifications.

#### **Modifications:**

#### 1. 3.0 Investigation of Source Removal, page 2

NMED is in agreement with the Permittees' proposal to install plume-center chromium extraction well CrEX-3 as presented in the Plan. The Permittees must submit a drilling work plan for the installation of plume-center chromium extraction well CrEX-3 no later than **November 25, 2015.** However, NMED notes that significant uncertainties exist

regarding chromium distribution and aquifer heterogeneity near the plume-center area south and southeast of R-42, and that additional characterization data may be needed in this particular area of the plume. It is NMED's understanding that the Permittees will install proposed extraction well CrEX-3 by the end of 2015, and are planning to continuously pump CrEX-3 and CrEX-1 starting in spring 2016. The goal of this pumping test is to determine capture zones, hydraulic responses, and aquifer properties, and to potentially delineate changes in chromium concentrations under transient conditions. Results and findings from the pumping test must be submitted in a summary report to NMED no later than **November 30, 2016**. The report must contain recommendations regarding potential further characterization activities, such as installation of additional plume-center extraction and/or injection wells, monitoring wells or piezometers.

#### 2. 3.4 Characterization of Infiltration beneath Lower Sandia Canyon, page 4

NMED concurs with the Permittees' proposal to further investigate infiltration in Sandia Canyon as presented in the Plan. Additionally, NMED offers that during the period of chromium releases to upper Sandia Canyon, the area of infiltration may have been further upstream than the investigation reach proposed in the Plan (see Figure 3.4-1, page 13). This assertion is based on NMED's review of aerial photographs taken prior to and during the chromium-release period from 1956 to 1972, as well as recent field observations and aerial photographs. Comparison of the referenced historical aerial photos to more recent aerial-view (e.g., Google Earth) photos and field observations indicate that a significant volume of alluvial material has been removed by erosion along a 2,000 foot long reach extending from surface-water monitoring station SCS-2 downstream to alluvial well SCA-2. Along this reach, an incised channel has formed measuring up to 12 - 15 ft below older depositional surfaces (e.g., floodplain). Thus, the available groundwater storage capacity in the alluvium was likely much greater along this reach prior to incision and during the chromium release period, and therefore, provided an area of significant recharge to underlying strata such as the permeable Cerro Toledo interval. Based on this observation, the Permittees must conduct an additional infiltration investigation along a reach extending from SCS-2 for an approximate distance of 1,000 ft downstream. The Permittees must submit a supplemental work plan for the infiltration investigation for both reaches no later than December 31, 2015.

#### 3. 4.0 SCHEDULE

Once all applicable National Environmental Policy Act (NEPA) Environmental Assessment requirements are met and permits by the New Mexico Office of the State Engineer (NMOSE) and NMED Groundwater Quality Bureau (GWQB) are granted, the Permittees must submit an itemized schedule of completion or projected completion specific to deliverables proposed in the Plan and additional NMED requirements, including: a) installation of CrEX-3 and associated injection wells, and hydraulic testing of CrEX-1 and CrEX-3; b) aquifer-dilution tracer tests and a field cross-hole tracer study; c) injection well study, and d) investigation to assess infiltration beneath Sandia Canyon. Mr. Hintze and Mr. Brandt October 15, 2015 Page 3

The Permittees' itemized schedule of completion and/or projected completion must be submitted to NMED no later than **30 days** after satisfying NEPA, GWQB, and NMOSE regulatory requirements.

In summary, the Permittees must submit the drilling work plan for the installation of plumecenter extraction well CrEX-3 no later than **November 25, 2015** and submit a supplemental work plan for the Sandia Canyon infiltration investigation no later than **December 31, 2015**.

Please contact Michael Dale at (505) 476-3078 if you have questions.

Sincerely,

John E. Kieling Chief

Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
B. Wear, NMED HWB
B. Wear, NMED HWB
M. Dale, NMED HWB
J. Kulis, NMED HWB
M. Hunter, NMED GWQB
S. Yanicak, NMED DOE OB, MS M894
L. King, EPA 6PD-N
R. Martinez, San Ildefonso Pueblo
D. Chavarria, Santa Clara Pueblo
C. Rodriguez, DOE-EM-LA, MS A316
J. Buckley, ENV-CP, MS K490

File: Reading and LANL 2015, Cr Plume

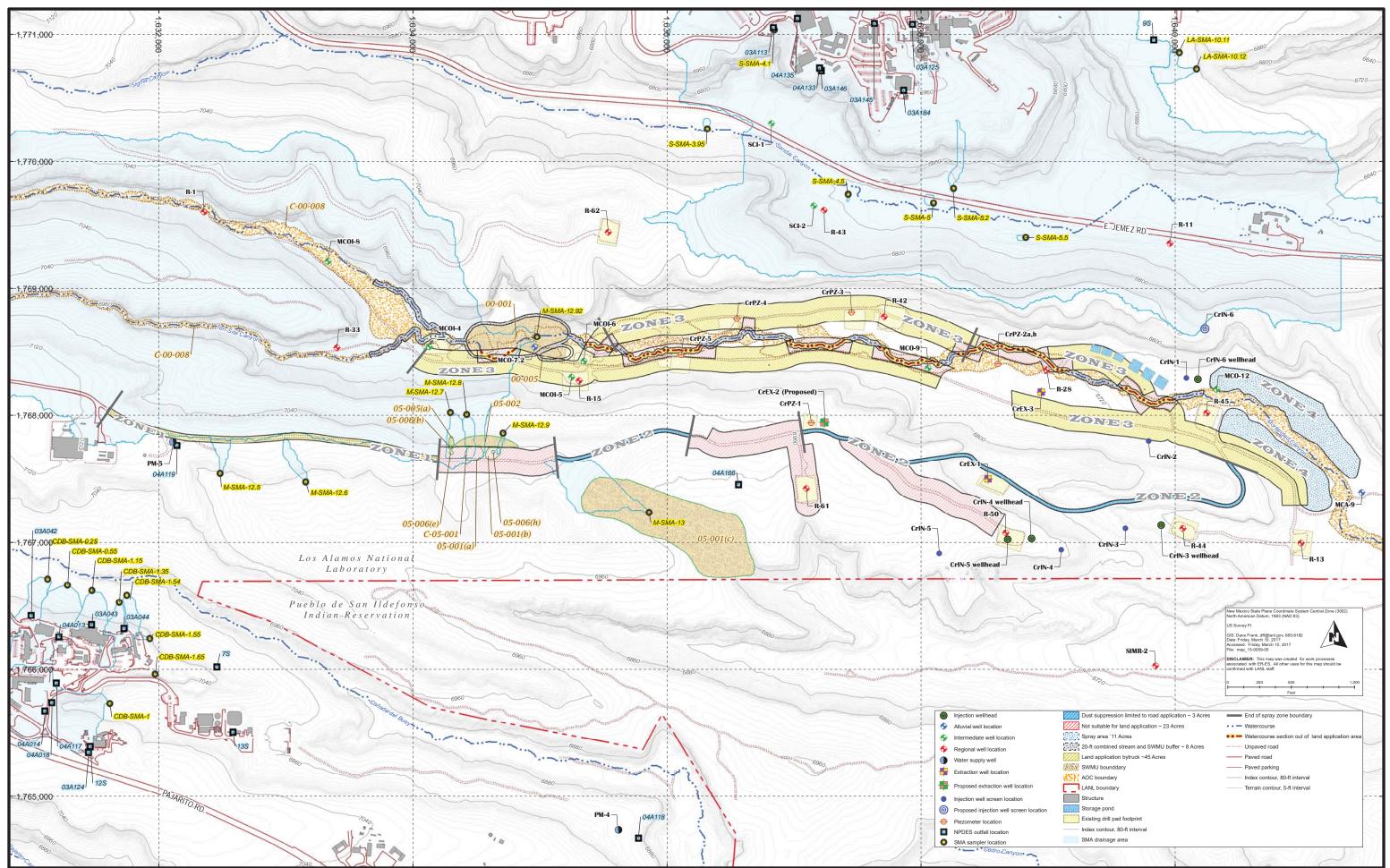
## Topographic Map of the Project Site

## EPC-DO: 17-050

## LA-UR-17-20362

## U1501760

Date: MAR 1 6 2017



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EPC-DO: 17-050

## Table 3.4-1 (Chromium Investigation Monitoring Group) from the Monitoring Year 2017 Interim Facility-Wide Groundwater Monitoring Plan

EPC-DO: 17-050

LA-UR-17-20362

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Date: MAR 1 6 2017

Table 3.4-1 Interim Monitoring Plan for Chromium Investigation Group

		I		1	1	-		1	T		T	1	1		1		<del></del>
Location	Watershed	Monitoring Group	Surface Water Body or Source Aquifer	Metals	VOCs	svocs	Low-MDL VOCs and SVOCs	PCBs	HEXMOD	Dioxins/Furans	Radionuclides	Tritium	Low-Level Tritium	General Inorganics	Chromium Isotopes	<sup>15</sup> N/ <sup>18</sup> O Isotopes in Nitrate	Tracers (Chromium Investigation Study)
MCOI-5	Mortandad	Chromium Investigation	Intermediate		S	S	a	—	—	—	A	A	—	Q	A	A	<u> </u>
MCOI-6	Mortandad	Chromium Investigation	Intermediate	Q	S	S	—	A	_	—	A	А	_	Q	Q	А	—
SCI-1	Sandia	Chromium Investigation	Intermediate	S	B (2018) <sup>b</sup>	B (2018)	—	B (2018)	_	—	А		A	S	A	A	—
SCI-2	Sandia	Chromium Investigation	Intermediate	Q	B (2018)	B (2018)	—	B (2018)		—	A	A	—	Q	S	A	—
R-1	Mortandad	Chromium Investigation	Regional	S	A	А	—	A	—	—	B (2018)	—	А	S	A	А	—
R-11	Sandia	Chromium Investigation	Regional	Q	B (2018)	B (2018)	—	—		—	B (2018)	—	A	Q	S	A	—
R-13	Mortandad	Chromium Investigation	Regional	Q	B (2018)	B (2018)	_	—		—	B (2018)	—	A	Q	A	А	<u> </u>
R-15	Mortandad	Chromium Investigation	Regional	Q	B (2018)	B (2018)	—	—		—	B (2018)	—	A	Q	A	A	—
R-28	Mortandad	Chromium Investigation	Regional	Q	B (2018)	B (2018)	_	—		_	B (2018)	А	—	Q	A	А	Q
R-33 S1	Mortandad	Chromium Investigation	Regional	Q	B (2018)	B (2018)	_	—		_	B (2018)	—	A	Q	A	А	<u> </u>
R-33 S2	Mortandad	Chromium Investigation	Regional	Q	B (2018)	B (2018)					B (2018)			Q	А	А	—
R-35a	Sandia	Chromium Investigation	Regional	Q	B (2018)	B (2018)					B (2018)		А	Q	A	А	—
R-35b	Sandia	Chromium Investigation	Regional	Q	B (2018)	B (2018)	_			_	B (2018)	—	А	Q	A	А	—
R-36	Sandia	Chromium Investigation	Regional	Q	A	А					B (2018)		А	Q	A	А	—
R-42	Mortandad	Chromium Investigation	Regional	Q	B (2018)	B (2018)	_	—		_	B (2018)	А	—	Q	A	А	Q
R-43 S1	Sandia	Chromium Investigation	Regional	Q	B (2018)	B (2018)	_	—		—	B (2018)	—	A	Q	Q	А	<u> </u>
R-43 S2	Sandia	Chromium Investigation	Regional	Q	B (2018)	B (2018)	_	—	—	_	B (2018)	—	A	Q	A	А	<u> </u>
R-44 S1	Mortandad	Chromium Investigation	Regional	Q	B (2018)	B (2018)	_	—		_	B (2018)	—	A	Q	S	S	—
R-44 S2	Mortandad	Chromium Investigation	Regional	Q	B (2018)	B (2018)				_	B (2018)		А	Q	A	А	—
R-45 S1	Mortandad	Chromium Investigation	Regional	Q	B (2018)	B (2018)					B (2018)		А	Q	Q	S	—
R-45 S2	Mortandad	Chromium Investigation	Regional	Q	B (2018)	B (2018)	_				B (2018)		А	Q	Q	S	_
R-50 S1	Mortandad	Chromium Investigation	Regional	Q	B (2018)	B (2018)	_	—		_	B (2018)	—	S	Q	Q	А	_
R-50 S2	Mortandad	Chromium Investigation	Regional	Q	B (2018)	B (2018)	_	_		_	B (2018)	_	S	Q	A	А	_
R-62	Mortandad	Chromium Investigation	Regional	Q	B (2018)	B (2018)	_			_	B (2018)		A	Q	S	А	
R-67 <sup>c</sup>	Sandia	Chromium Investigation	Regional	Q1	Q1	Q1	_	Q1	Q1	Q1	Q1		Q1	Q1	Q1	Q1	_
R-67 <sup>d</sup>	Sandia	Chromium Investigation	Regional	Q	B (2018)	B (2018)		_	_	_	B (2018)	—	S	Q	Q	А	—
SIMR-2 <sup>e</sup>	Sandia	Chromium Investigation	Regional	Q	B (2018)	B (2018)					B (2018)		S	Q	S	A	—
		uencies: O – quarterly (4 times				ual (1 timo/v									a Voor 2017		

Notes: Sampling suites and frequencies: Q = quarterly (4 times/yr); S = semiannual (2 times/yr); A = annual (1 time/yr); B = biennial (1 time/2 yr); T = triennial (1 time/3 yr); V = quinquennial (1 time/5 yr); Q1 = Monitoring Year 2017 Q1 only. <sup>a</sup> — = This analytical suite is not scheduled to be collected for this type of water at locations assigned to this monitoring group.

<sup>b</sup> 2018 = Samples scheduled to be collected during implementation of MY2018 Interim Plan.

<sup>c</sup> R-67 sampling plan for MY2017 Q1 only. This Q1 sampling plan for R-67 produces the fourth "full analytical suite" sampling round (out of four required) for this new regional well.

<sup>d</sup> R-67 sampling frequencies for MY2017 Q2, Q3, and Q4. Used the specified sampling frequencies in conjunction with Table 1.7-1 to develop the R-67 sampling plan for Q2, Q3 and Q4.

<sup>e</sup> Orange shading indicates sampling location is on Pueblo de San Ildefonso land.

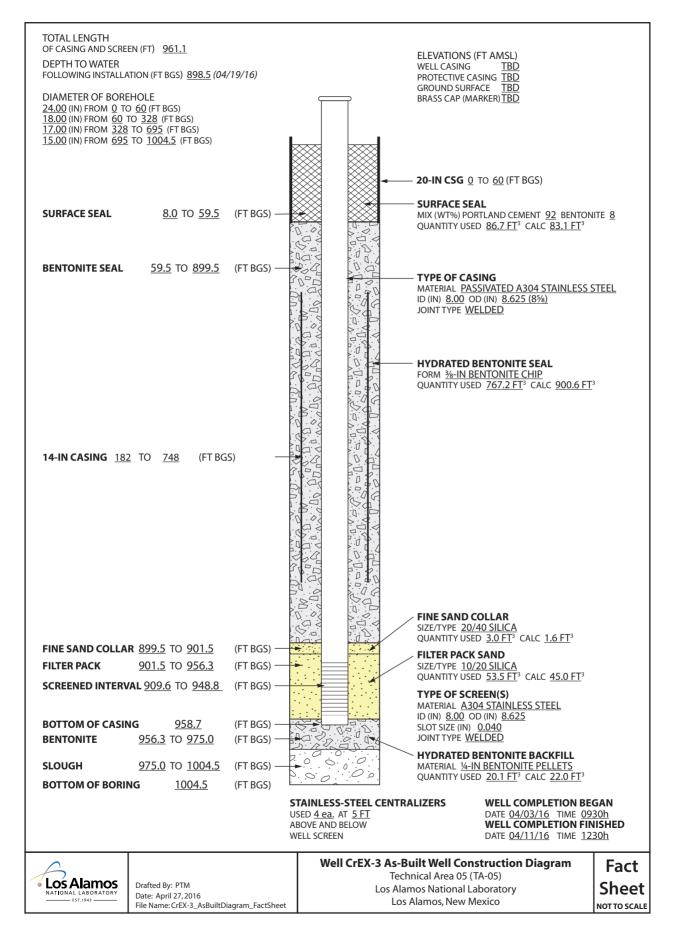
# As-Built Specifications for CrEX-3, CrIN-1, CrIN-2, CrIN-3, CrIN-4, CrIN-5, R-15, R-61, and CrPZ-4

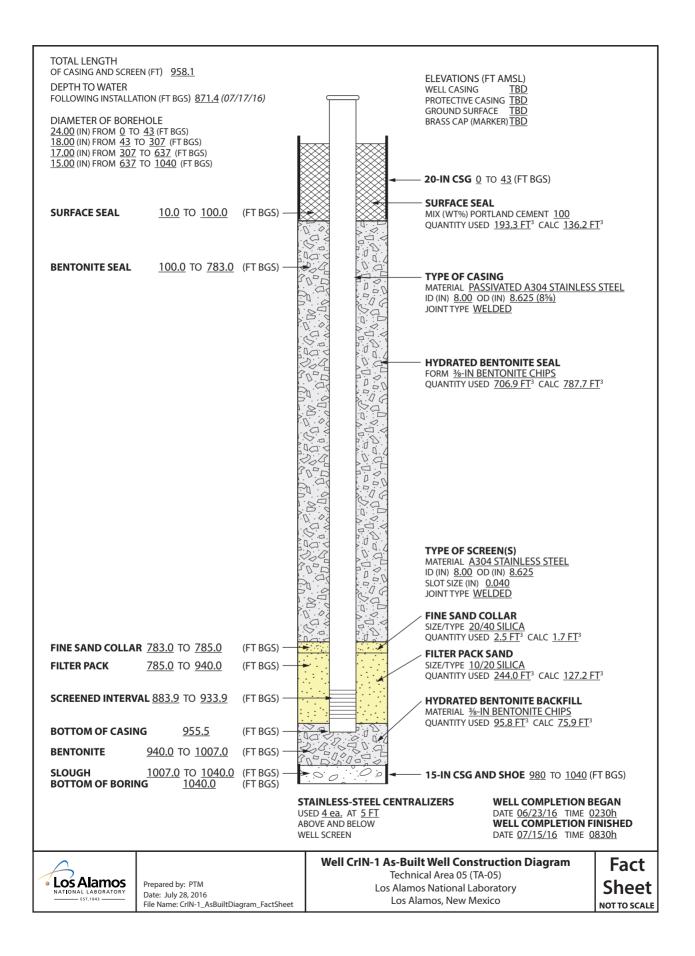
EPC-DO: 17-050

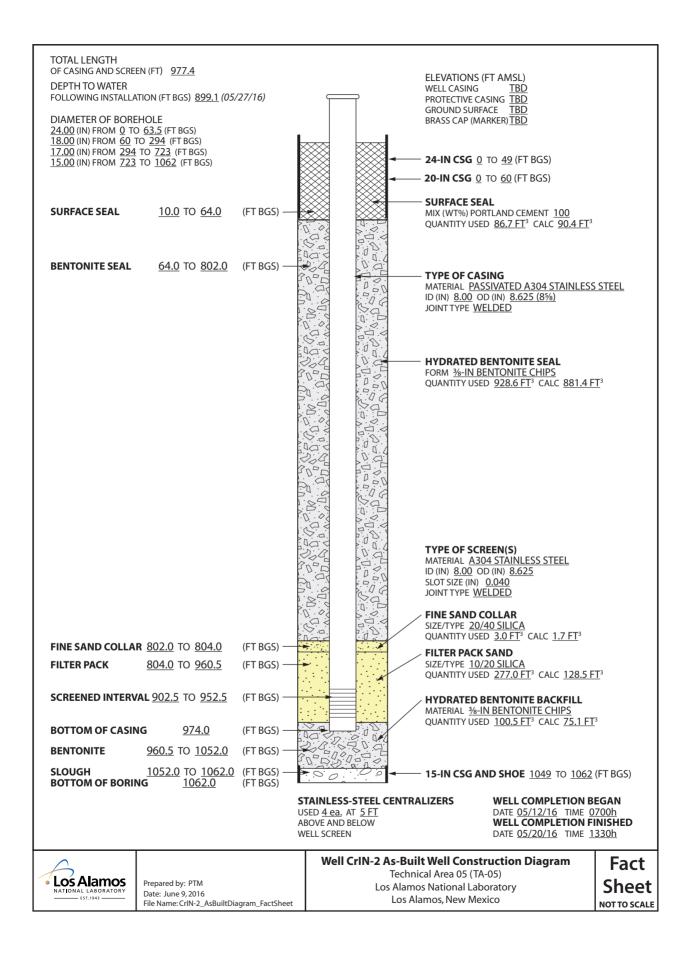
LA-UR-17-20362

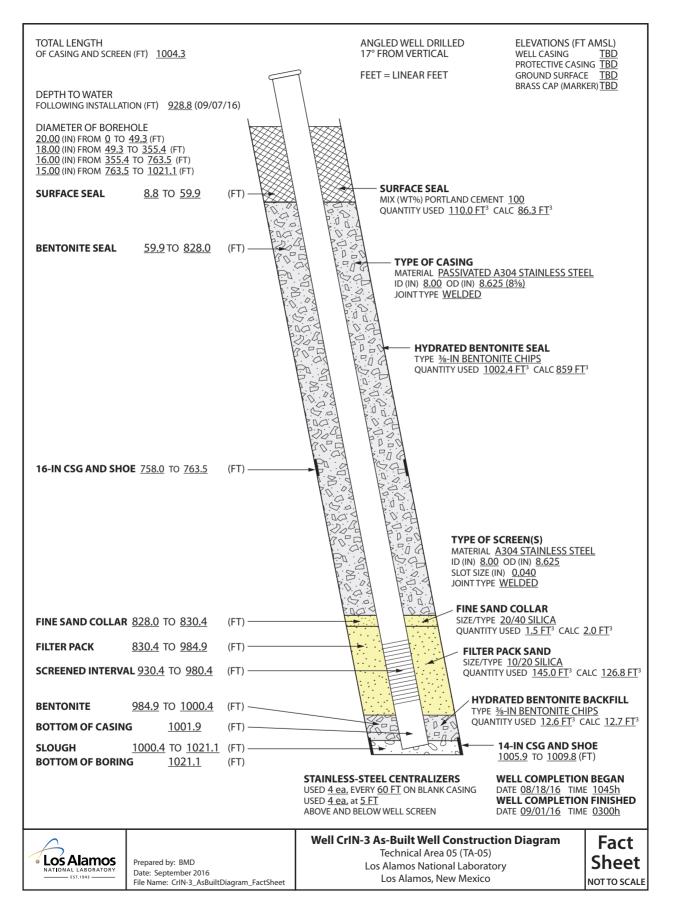
U1501760

Date: \_\_\_\_\_MAR 1 6 2017

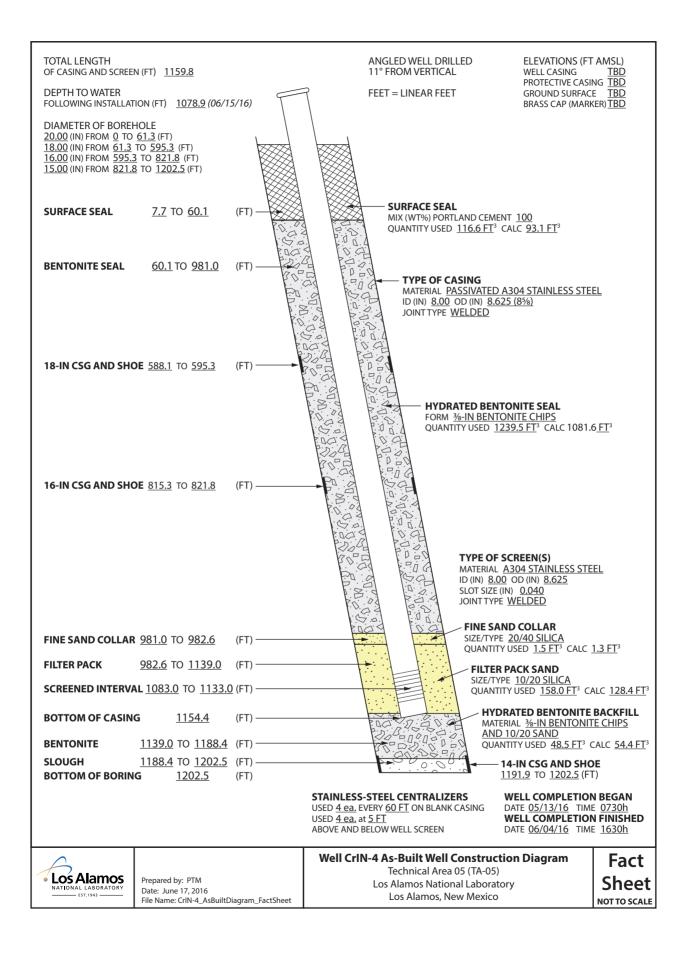


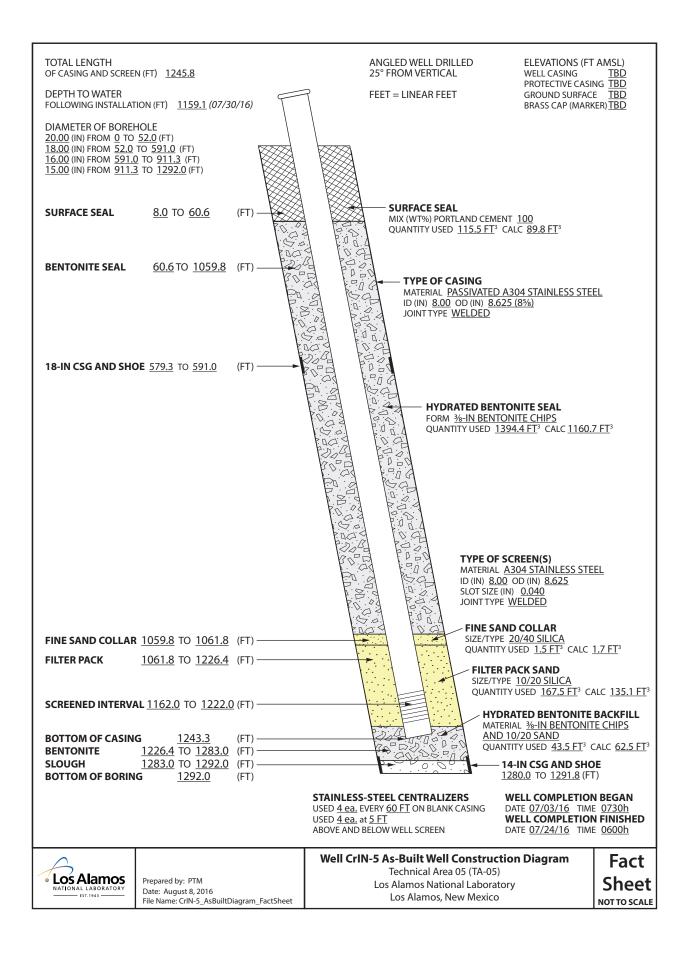


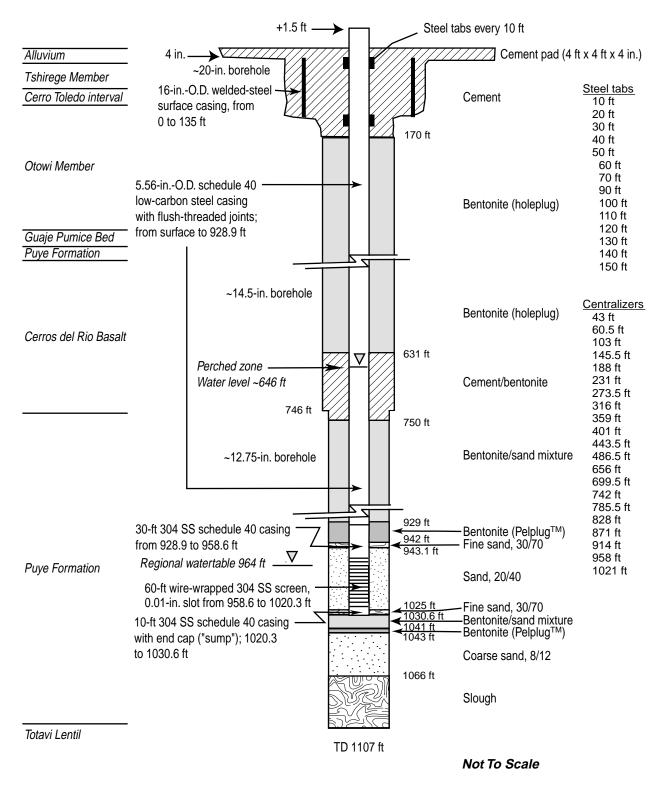




4

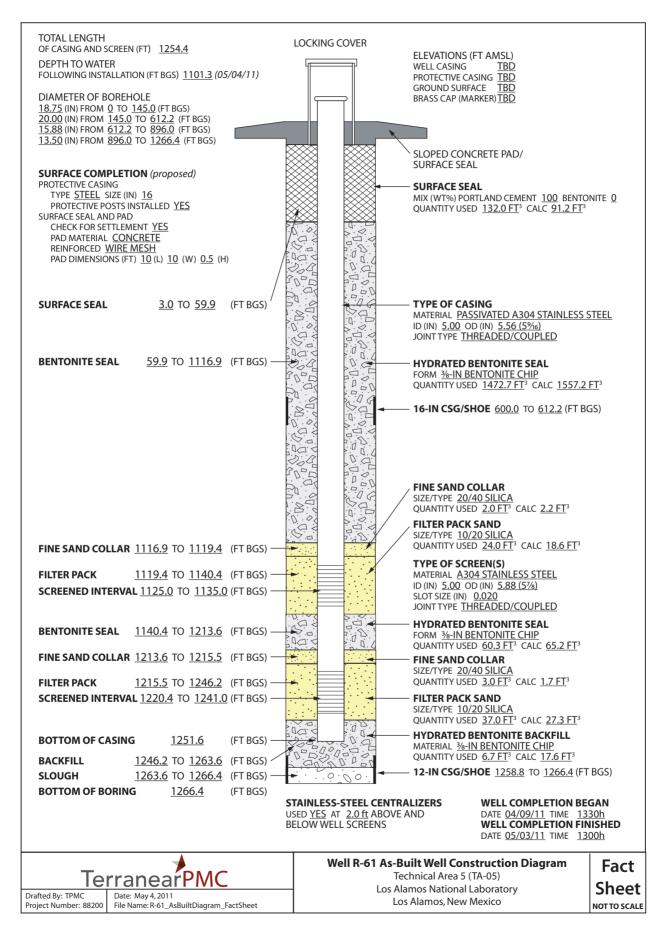


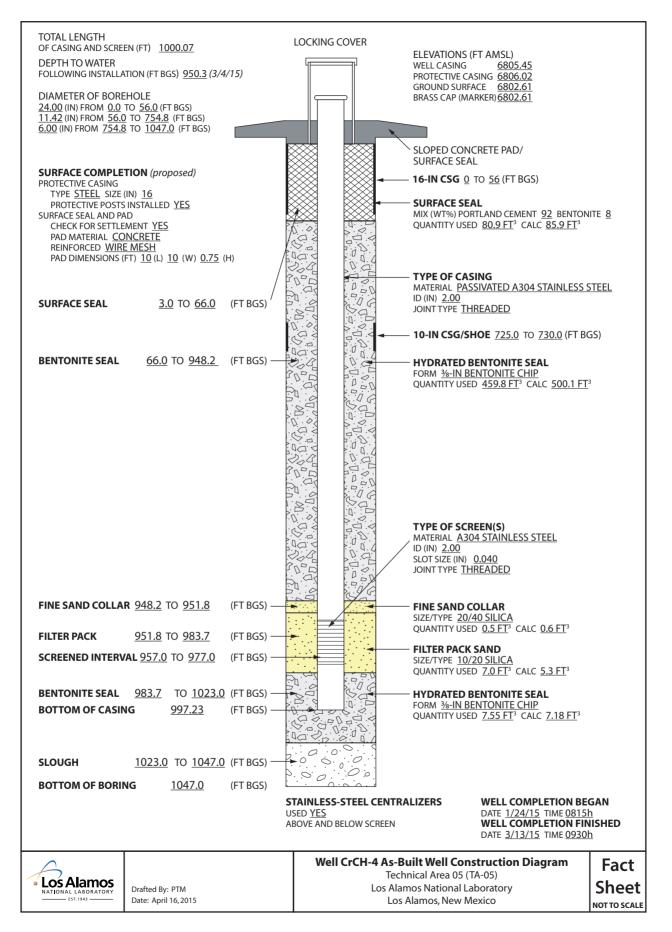




F8.2-1 / R-15 WELL COMPLETION RPT / 083000 / PTM

#### Figure 8.2-1. As-built well completion diagram of well R-15





## Water Quality Data from CrEX-1, CrEX-3, CrIN-1, CrIN-2, CrIN-3, CrIN-4, CrIN-5, R-15, R-28, R-42, R-43-S1, R-50-S1, R-61, R-62, CrPZ-1, CrPZ-2a, CrPZ-2b, CrPZ-3, CrPZ-4, and CrPZ-5

EPC-DO: 17-050

LA-UR-17-20362

U1501760

Date: MAR 1 6 2017

Field Sample ID	Location ID	Sample Date	Parameter Name	Report Result	Report Units	Lab Qualifier	Filtered	Lab Method	Report Detection Limit
CAMO-16-110036	R-15	02-04-2016	Perchlorate	8.7	ug/L		Y	SW-846:6850	2.0
CAMO-16-110036	R-15	02-04-2016	Chromium	12.4	ug/L		Y	SW-846:6020	10.0
CAMO-16-110036	R-15	02-04-2016	Nitrate-Nitrite as Nitrogen	2.0	mg/L		Y	EPA:353.2	0.25
CAMO-16-115274	R-15	05-04-2016	Perchlorate	8.7	ug/L		Y	SW-846:6850	2.0
CAMO-16-115274	R-15	05-04-2016	Chromium	15.9	ug/L		Ý	SW-846:6020	10.0
CAMO-16-115274	R-15		Nitrate-Nitrite as Nitrogen	2.3	mg/L		Ý	EPA:353.2	0.25
CAMO-16-124287	R-15	07-26-2016	Perchlorate	8.9	ug/L		Y	SW-846:6850	4.0
CAMO-16-124287	R-15	07-26-2016	Chromium	11.6	ug/L		Ý	SW-846:6020	10.0
CAMO-16-124287	R-15		Nitrate-Nitrite as Nitrogen	2.1	mg/L		Ý	EPA:353.2	0.25
CAMO-17-127247	R-15	11-15-2016	Perchlorate	10.8	ug/L		Y	SW-846:6850	2.0
CAMO-17-127247	R-15	11-15-2016	Chromium	14.2	ug/L		Ý	SW-846:6020	10.0
CAMO-17-127247	R-15		Nitrate-Nitrite as Nitrogen	2.1	mg/L		Ý	EPA:353.2	0.25
CAMO-16-110037	R-28	02-11-2016	Perchlorate	1.0	ug/L		Ý	SW-846:6850	0.2
CAMO-16-110037	R-28	02-11-2016		404	ug/L		Ŷ	SW-846:6020	10.0
CAMO-16-110037	R-28		Nitrate-Nitrite as Nitrogen	4.02	mg/L		Ý	EPA:353.2	0.25
CAMO-16-115275	R-28	05-11-2016	Perchlorate	1.0	ug/L		Ŷ	SW-846:6850	0.4
CAMO-16-115275	R-28	05-11-2016	Chromium	368	ug/L		Ý	SW-846:6020	100
CAMO-16-115275	R-28		Nitrate-Nitrite as Nitrogen	4.03	mg/L		Y	EPA:353.2	0.5
WSTMO-16-121824	R-28	05-25-2016	Chromium	2.0	ug/L	U	N	SW-846:6020	10.0
WSTMO-16-121825	R-28	05-25-2010	Chromium	2.0	ug/L	U	N	SW-846:6020	10.0
WSTMO-16-121826	R-28	05-25-2010	Chromium	2.0	ug/L	U	N	SW-846:6020	10.0
WSTMO-16-121827	R-28	05-25-2010	Chromium	2.42	ug/L	J	N	SW-846:6020	10.0
WSTMO-16-121828	R-28	05-25-2010	Chromium	2.25	ug/L	J	N	SW-846:6020	10.0
WSTMO-16-121829	R-28	05-25-2010	Chromium	11.6	ug/L	0	N	SW-846:6020	10.0
WSTMO-16-121829	R-28	05-25-2010	Perchlorate	0.1	ug/L	J	Y	SW-846:6850	0.2
WSTMO-16-121855	R-28	05-25-2010	Perchlorate	0.1	ug/L	J	Y	SW-846:6850	0.2
WSTMO-16-121856	R-28	05-25-2010	Perchlorate	0.1	ug/L	J	Y	SW-846:6850	0.2
WSTMO-16-121857	R-28	05-25-2010	Perchlorate	0.1	ug/L	J	Y	SW-846:6850	0.2
WSTMO-16-121858	R-28	05-25-2010	Perchlorate	0.1	ug/L	J	Y	SW-846:6850	0.2
WSTMO-16-121859	R-28	05-25-2010	Perchlorate	0.1	ug/L	J	Y	SW-846:6850	0.2
CAMO-16-124291	R-28	07-25-2010	Perchlorate	0.1	ug/L	J	Y	SW-846:6850	0.2
CAMO-16-124291 CAMO-16-124291	R-28	07-25-2010	Chromium	430	ug/L		Y	SW-846:6020	10.0
CAMO-16-124291 CAMO-16-124291	R-28		Nitrate-Nitrite as Nitrogen	3.87	mg/L		Y	EPA:353.2	0.25
TRR-28-16-123691	R-28	09-19-2016	Chromium	366	ug/L		Y	EPA:200.8	0.23
TRR-28-16-123692	R-28	10-05-2016	Chromium		ug/L		Y	EPA:200.8	
TRR-28-16-123693	R-28	10-05-2010	Chromium	48 56	ug/L		Y	EPA:200.8	
TRR-28-16-123694	R-28	10-00-2010		44	ug/L		Y	EPA:200.8	
TRR-28-16-123695	R-28	10-07-2010		44	ug/L		Y	EPA:200.8	
TRR-28-16-123696	R-28	10-09-2016		40	ug/L		Y	EPA:200.8	
					Ū		Y		
TRR-28-16-123697 TRR-28-16-123698	R-28 R-28	10-10-2016 10-11-2016	Chromium Chromium	45 44	ug/L ug/L		Y	EPA:200.8 EPA:200.8	┟─────┦
TRR-28-16-123699	R-20 R-28	10-11-2016	Chromium	44	ug/L ug/L		Y	EPA:200.8	
TRR-28-16-123700	R-28	10-12-2016		43 62	ug/L ug/L		Y	EPA:200.8	
TRR-28-16-123700	R-28	10-13-2016	Chromium	49.1			Y	EPA:200.8	
TRR-28-16-123701	R-20 R-28	10-13-2016	Chromium	49.1 55	ug/L ug/L		Y	EPA:200.8 EPA:200.8	
TRR-28-16-123702	R-20 R-28	10-15-2016	Chromium	55 57			Y	EPA:200.8	
TRR-28-16-123703	R-20 R-28	10-17-2016		57 54	ug/L		Y	EPA:200.8 EPA:200.8	
TRR-28-16-123704 TRR-28-16-123705	R-28 R-28	10-17-2016		54 82	ug/L ug/L		Y Y	EPA:200.8 EPA:200.8	┟─────┦
					Ŭ		Y Y		┟─────┦
TRR-28-16-123706	R-28	10-19-2016		79 88	ug/L		Y Y	EPA:200.8	
TRR-28-16-123707	R-28	10-20-2016	Chromium	88	ug/L	ļ	Ŷ	EPA:200.8	ļļ

Field Sample ID	Location ID	Sample Date	Parameter Name	Report Result	Report Units	Lab Qualifier	Filtered	Lab Method	Report Detection Limit
TRR-28-16-123708	R-28	10-21-2016	Chromium	91	ug/L		Y	EPA:200.8	
TRR-28-16-123709	R-28	10-22-2016	Chromium	82	ug/L		Y	EPA:200.8	
TRR-28-16-123710	R-28	10-22-2016	Chromium	79.4	ug/L		Y	EPA:200.8	
TRR-28-16-123711	R-28	10-24-2016	Chromium	114	ug/L		Y	EPA:200.8	
TRR-28-16-123712	R-28	10-25-2016	Chromium	96	ug/L		Y	EPA:200.8	
TRR-28-16-123713	R-28	10-26-2016	Chromium	94	ug/L		Y	EPA:200.8	
TRR-28-16-123714	R-28	10-27-2016	Chromium	103	ug/L		Y	EPA:200.8	
TRR-28-16-123715	R-28	10-28-2016	Chromium	101	ug/L		Y	EPA:200.8	
TRR-28-16-123716	R-28	10-29-2016	Chromium	113	ug/L		Y	EPA:200.8	
TRR-28-16-123717	R-28	10-30-2016	Chromium	108	ug/L		Y	EPA:200.8	
TRR-28-16-123718	R-28	10-31-2016	Chromium	114	ug/L		Y	EPA:200.8	
TRR-28-16-123720	R-28	11-02-2016	Chromium	139	ug/L		Y	EPA:200.8	
TRR-28-16-123721	R-28	11-03-2016	Chromium	149	ug/L		Y	EPA:200.8	
TRR-28-16-123722	R-28	11-04-2016	Chromium	161	ug/L		Ý	EPA:200.8	
TRR-28-16-123723	R-28	11-05-2016	Chromium	151	ug/L		Ŷ	EPA:200.8	
TRR-28-16-123724	R-28	11-06-2016	Chromium	165	ug/L		Ý	EPA:200.8	
TRR-28-16-123725	R-28	11-07-2016	Chromium	194	ug/L		Y	EPA:200.8	
TRR-28-16-123726	R-28	11-08-2016	Chromium	206	ug/L		Ý	EPA:200.8	
TRR-28-16-123727	R-28	11-09-2016	Chromium	259	ug/L		Ý	EPA:200.8	
TRR-28-16-123728	R-28	11-10-2016	Chromium	312	ug/L		Ŷ	EPA:200.8	
TRR-28-16-123729	R-28	11-11-2016	Chromium	204	ug/L		N	EPA:200.8	
TRR-28-16-123730	R-28	11-14-2016	Chromium	223	ug/L		N	EPA:200.8	
TRR-28-17-127653	R-28	11-17-2016	Chromium	319	ug/L		Y	EPA:200.8	
TRR-28-17-127654	R-28	11-18-2016	Chromium	360	ug/L		Ý	EPA:200.8	
CAMO-16-110041	R-42	02-04-2016	Perchlorate	1.2	ug/L		Ý	SW-846:6850	0.4
CAMO-16-110041	R-42	02-04-2016		836	ug/L		Ŷ	SW-846:6020	10.0
CAMO-16-110041	R-42		Nitrate-Nitrite as Nitrogen	5.3	mg/L		Ŷ	EPA:353.2	0.5
CAMO-16-115279	R-42	05-04-2016	Perchlorate	1.2	ug/L		Ŷ	SW-846:6850	0.4
CAMO-16-115279	R-42	05-04-2016	Chromium	718	ug/L		Ŷ	SW-846:6020	10.0
CAMO-16-115279	R-42		Nitrate-Nitrite as Nitrogen	6.3	mg/L		Ŷ	EPA:353.2	0.25
TRR-42-16-123772	R-42	07-15-2016	Chromium	664	ug/L		Ý	EPA:200.8	0.20
TRR-42-16-123773	R-42	07-18-2016	Chromium	190	ug/L		Ý	EPA:200.8	
TRR-42-16-123774	R-42	07-20-2016	Chromium	300	ug/L		Ý	EPA:200.8	
TRR-42-16-123775	R-42	07-22-2016	Chromium	208	ug/L		Ý	EPA:200.8	
TRR-42-16-123776	R-42	07-25-2016		166	ug/L		Y	EPA:200.8	
TRR-42-16-123777	R-42	07-27-2016		166	ug/L		Y	EPA:200.8	
TRR-42-16-123778	R-42	07-29-2016		121	ug/L		Y	EPA:200.8	
TRR-42-16-123779	R-42	08-01-2016		44	ug/L		Y	EPA:200.8	
TRR-42-16-123780	R-42	08-03-2016		45	ug/L		Ý	EPA:200.8	
TRR-42-16-123781	R-42	08-05-2016		61	ug/L		Y	EPA:200.8	
TRR-42-16-123782	R-42	08-08-2016		46	ug/L		Y	EPA:200.8	
TRR-42-16-123783	R-42	08-09-2016		49	ug/L		Y	EPA:200.8	
TRR-42-16-123784	R-42	08-10-2016		52	ug/L		Y	EPA:200.8	
TRR-42-16-123785	R-42	08-11-2016		60	ug/L		Ý	EPA:200.8	
TRR-42-16-123786	R-42	08-12-2016		64	ug/L		Y	EPA:200.8	
TRR-42-16-123787	R-42	08-15-2016		73	ug/L		Y	EPA:200.8	
TRR-42-16-123787	R-42	08-13-2010		94	ug/L		Y	EPA:200.8	
TRR-42-16-123788	R-42 R-42	08-17-2016		94 140	ug/L		Y	EPA:200.8	
TRR-42-16-123789	R-42 R-42	08-19-2010		140	ug/L		Y	EPA:200.8	
1111-72-10-120130	11-42	00-22-2010	Chromium	111	uy/L		1		l

TRR-42-16-123792         TRR-42-16-123793         TRR-42-16-123794         TRR-42-16-123795         TRR-42-16-123796         TRR-42-16-123796         TRR-42-16-123797         TRR-42-16-123798         TRR-42-16-123799         TRR-42-16-123800         TRR-42-16-123801         TRR-42-16-123802         TRR-42-16-123803         TRR-42-16-123804         TRR-42-16-123805         TRR-42-16-123806         TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-16-123804         TRR-42-16-123808         TRR-42-16-123808         TRR-42-16-123808         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-17-126896         TRR-42-17-126898		08-26-2016 08-29-2016 09-02-2016 09-07-2016 09-09-2016 09-13-2016 09-14-2016 09-16-2016 09-19-2016 09-21-2016 09-23-2016 09-26-2016	Chromium Chromium Chromium Chromium Chromium Chromium Chromium Chromium Chromium	175 168 224 254 245 306 323 336	ug/L ug/L ug/L ug/L ug/L ug/L		Y Y Y Y Y	EPA:200.8 EPA:200.8 EPA:200.8 EPA:200.8	
TRR-42-16-123794         TRR-42-16-123795         TRR-42-16-123796         TRR-42-16-123797         TRR-42-16-123797         TRR-42-16-123798         TRR-42-16-123799         TRR-42-16-123800         TRR-42-16-123801         TRR-42-16-123802         TRR-42-16-123803         TRR-42-16-123804         TRR-42-16-123805         TRR-42-16-123806         TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-16-123810	R-42 R-42 R-42 R-42 R-42 R-42 R-42 R-42	08-29-2016 08-31-2016 09-02-2016 09-07-2016 09-09-2016 09-13-2016 09-14-2016 09-14-2016 09-19-2016 09-21-2016 09-23-2016	Chromium Chromium Chromium Chromium Chromium Chromium Chromium	224 254 245 306 323	ug/L ug/L ug/L ug/L ug/L		Y Y	EPA:200.8	
TRR-42-16-123795         TRR-42-16-123796         TRR-42-16-123797         TRR-42-16-123798         TRR-42-16-123798         TRR-42-16-123799         TRR-42-16-123800         TRR-42-16-123801         TRR-42-16-123802         TRR-42-16-123803         TRR-42-16-123804         TRR-42-16-123805         TRR-42-16-123806         TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-16-123810	R-42 R-42 R-42 R-42 R-42 R-42 R-42 R-42	09-02-2016 09-07-2016 09-09-2016 09-13-2016 09-14-2016 09-16-2016 09-21-2016 09-21-2016 09-23-2016	Chromium Chromium Chromium Chromium Chromium Chromium	224 254 245 306 323	ug/L ug/L ug/L ug/L		Y	EPA:200.8	
TRR-42-16-123796         TRR-42-16-123797         TRR-42-16-123798         TRR-42-16-123799         TRR-42-16-123800         TRR-42-16-123801         TRR-42-16-123802         TRR-42-16-123803         TRR-42-16-123803         TRR-42-16-123804         TRR-42-16-123805         TRR-42-16-123806         TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-16-123810         TRR-42-16-123805	R-42 R-42 R-42 R-42 R-42 R-42 R-42 R-42	09-07-2016 09-09-2016 09-13-2016 09-14-2016 09-16-2016 09-19-2016 09-21-2016 09-23-2016	Chromium Chromium Chromium Chromium Chromium	245 306 323	ug/L ug/L ug/L				
TRR-42-16-123797         TRR-42-16-123798         TRR-42-16-123799         TRR-42-16-123800         TRR-42-16-123801         TRR-42-16-123802         TRR-42-16-123803         TRR-42-16-123804         TRR-42-16-123805         TRR-42-16-123806         TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-16-123810	R-42 R-42 R-42 R-42 R-42 R-42 R-42 R-42	09-07-2016 09-09-2016 09-13-2016 09-14-2016 09-16-2016 09-19-2016 09-21-2016 09-23-2016	Chromium Chromium Chromium Chromium	245 306 323	ug/L ug/L		Y		
TRR-42-16-123797         TRR-42-16-123798         TRR-42-16-123799         TRR-42-16-123800         TRR-42-16-123801         TRR-42-16-123802         TRR-42-16-123803         TRR-42-16-123804         TRR-42-16-123805         TRR-42-16-123806         TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-16-123810	R-42 R-42 R-42 R-42 R-42 R-42 R-42 R-42	09-09-2016 09-13-2016 09-14-2016 09-16-2016 09-19-2016 09-21-2016 09-23-2016	Chromium Chromium Chromium	306 323	ug/L			EPA:200.8	
TRR-42-16-123798         TRR-42-16-123799         TRR-42-16-123800         TRR-42-16-123801         TRR-42-16-123802         TRR-42-16-123803         TRR-42-16-123804         TRR-42-16-123805         TRR-42-16-123806         TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-16-123810	R-42 R-42 R-42 R-42 R-42 R-42 R-42 R-42	09-13-2016 09-14-2016 09-16-2016 09-19-2016 09-21-2016 09-23-2016	Chromium Chromium	323	-		Y	EPA:200.8	
TRR-42-16-123800         TRR-42-16-123801         TRR-42-16-123802         TRR-42-16-123803         TRR-42-16-123804         TRR-42-16-123805         TRR-42-16-123806         TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-16-123810         TRR-42-17-126896	R-42 R-42 R-42 R-42 R-42 R-42 R-42 R-42	09-16-2016 09-19-2016 09-21-2016 09-23-2016	Chromium		uu/L		Y	EPA:200.8	
TRR-42-16-123800         TRR-42-16-123801         TRR-42-16-123802         TRR-42-16-123803         TRR-42-16-123804         TRR-42-16-123805         TRR-42-16-123806         TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-16-123810         TRR-42-17-126896	R-42 R-42 R-42 R-42 R-42 R-42 R-42 R-42	09-16-2016 09-19-2016 09-21-2016 09-23-2016			ug/L		Y	EPA:200.8	
TRR-42-16-123802         TRR-42-16-123803         TRR-42-16-123804         TRR-42-16-123805         TRR-42-16-123806         TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-17-126896	R-42 R-42 R-42 R-42 R-42	09-21-2016 09-23-2016	Chromium	350	ug/L		Y	EPA:200.8	
TRR-42-16-123802         TRR-42-16-123803         TRR-42-16-123804         TRR-42-16-123805         TRR-42-16-123806         TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-17-126896	R-42 R-42 R-42 R-42 R-42	09-21-2016 09-23-2016	_	365	ug/L		Y	EPA:200.8	
TRR-42-16-123803         TRR-42-16-123804         TRR-42-16-123805         TRR-42-16-123806         TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-17-126896	R-42 R-42 R-42 R-42	09-23-2016	Chromium	432	ug/L		Y	EPA:200.8	
TRR-42-16-123804         TRR-42-16-123805         TRR-42-16-123806         TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-17-126896	R-42 R-42 R-42		Chromium	480	ug/L		Y	EPA:200.8	
TRR-42-16-123805         TRR-42-16-123806         TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-17-126896	R-42 R-42	00-20-2010	Chromium	486	ug/L		Y	EPA:200.8	
TRR-42-16-123806         TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-17-126896	R-42	09-28-2016	Chromium	513	ug/L		Y	EPA:200.8	
TRR-42-16-123807         TRR-42-16-123808         TRR-42-16-123809         TRR-42-16-123810         TRR-42-17-126896		09-30-2016	Chromium	494	ug/L		Y	EPA:200.8	
TRR-42-16-123808           TRR-42-16-123809           TRR-42-16-123810           TRR-42-17-126896		10-03-2016	Chromium	602	ug/L		Ý	EPA:200.8	
TRR-42-16-123809           TRR-42-16-123810           TRR-42-17-126896	R-42	10-05-2016	Chromium	616	ug/L		Ŷ	EPA:200.8	
TRR-42-16-123810 TRR-42-17-126896	R-42	10-07-2016	Chromium	623	ug/L		Ý	EPA:200.8	
TRR-42-17-126896	R-42	10-11-2016	Chromium	619	ug/L		Ŷ	EPA:200.8	
	R-42	10-12-2016	Chromium	577	ug/L		Ŷ	EPA:200.8	
THAT IE IT IE0000	R-42	10-17-2016	Chromium	628	ug/L		Ŷ	EPA:200.8	
TRR-42-17-126899	R-42	10-19-2016	Chromium	637	ug/L		Ý	EPA:200.8	
TRR-42-17-126900	R-42	10-21-2016	Chromium	672	ug/L		Ý	EPA:200.8	
TRR-42-17-126903	R-42	10-28-2016	Chromium	658	ug/L		Ŷ	EPA:200.8	
TRR-42-17-126904	R-42	10-31-2016	Chromium	674	ug/L		Ŷ	EPA:200.8	
TRR-42-17-126906	R-42	11-04-2016	Chromium	691	ug/L		Ý	EPA:200.8	
TRR-42-17-126907	R-42	11-07-2016	Chromium	654	ug/L		Ý	EPA:200.8	
TRR-42-17-126908	R-42	11-09-2016	Chromium	685	ug/L		Ý	EPA:200.8	
TRR-42-17-126909	R-42	11-10-2016	Chromium	701	ug/L		Ý	EPA:200.8	
TRR-42-17-126910	R-42	11-14-2016	Chromium	694	ug/L		N	EPA:200.8	
TRR-42-17-126911	R-42	11-16-2016	Chromium	688	ug/L		Y	EPA:200.8	
TRR-42-17-126912	R-42	11-18-2016	Chromium	668	ug/L		Ý	EPA:200.8	
TRR-42-17-126913	R-42	11-21-2016	Chromium	682	ug/L		Ý	EPA:200.8	
	R-43 S1	02-16-2016	Perchlorate	0.2	ug/L	U	N	SW-846:6850	0.2
		02-16-2016	Chromium	3	ug/L	J		SW-846:6020	10.0
			Nitrate-Nitrite as Nitrogen	0.02	mg/L	J	N	EPA:353.2	0.05
		02-16-2016	Perchlorate	0.9	ug/L	0		SW-846:6850	0.00
		02-16-2016		155	ug/L			SW-846:6020	10.0
			Nitrate-Nitrite as Nitrogen	5.89	mg/L		Y	EPA:353.2	0.5
		02-16-2016	Perchlorate	1.0	ug/L		Y	SW-846:6850	0.3
		02-16-2016		153	ug/L ug/L			SW-846:6020	10.0
			Nitrate-Nitrite as Nitrogen	6.15	mg/L		Y	EPA:353.2	0.5
	R-43 S1 R-43 S1	05-12-2016	Perchlorate	0.15	ug/L			SW-846:6850	0.3
		05-12-2016		156	ug/L			SW-846:6020	10.0
			Nitrate-Nitrite as Nitrogen	5.46	mg/L		Y	EPA:353.2	0.5
		03-12-2016	Perchlorate	1.0	ug/L			SW-846:6850	0.3
		08-02-2016		160	ug/L ug/L				10.0
					-		Y Y	SW-846:6020 EPA:353.2	
	R-43 S1	11-14-2016	Nitrate-Nitrite as Nitrogen	5.04	mg/L		, T	EFA.3337	0.5
CASA-17-127294 R CASA-17-127294 R	R-43 S1	11-14-2010	Perchlorate	0.9	ug/L		Ŷ	SW-846:6850	0.2

Field Sample ID	Location ID	Sample Date	Parameter Name	Report Result	Report Units	Lab Qualifier	Filtered	Lab Method	Report Detection Limit
CASA-17-127294	R-43 S1	11-14-2016	Nitrate-Nitrite as Nitrogen	5.19	mg/L		Y	EPA:353.2	0.5
CAMO-16-110046	R-50 S1	02-16-2016	Perchlorate	0.7	ug/L		Y	SW-846:6850	0.2
CAMO-16-110046	R-50 S1	02-16-2016	Chromium	139.0	ug/L		Y	SW-846:6020	10.0
CAMO-16-110046	R-50 S1		Nitrate-Nitrite as Nitrogen	2.72	mg/L		Y	EPA:353.2	0.25
CAMO-16-115285	R-50 S1	05-12-2016	Perchlorate	0.6	ug/L		Y	SW-846:6850	0.2
CAMO-16-115285	R-50 S1	05-12-2016	Chromium	146.0	ug/L		Y	SW-846:6020	10.0
CAMO-16-115285	R-50 S1		Nitrate-Nitrite as Nitrogen	2.04	mg/L		Y	EPA:353.2	0.25
CAMO-16-124300	R-50 S1	07-27-2016	Perchlorate	0.6	ug/L		Y	SW-846:6850	0.2
CAMO-16-124300	R-50 S1	07-27-2016	Chromium	107.0	ug/L		Y	SW-846:6020	10.0
CAMO-16-124300	R-50 S1		Nitrate-Nitrite as Nitrogen	1.85	mg/L		Y	EPA:353.2	0.25
CAMO-16-124375	R-50 S1	07-27-2016	Chromium	174.7	ug/L		Ý	EPA:200.8	0.20
CAMO-16-124376	R-50 S1	07-27-2016	Chromium	128.7	ug/L		Ý	EPA:200.8	
CAMO-16-124377	R-50 S1	07-27-2016	Chromium	107.6	ug/L		Ý	EPA:200.8	
CAMO-16-124378	R-50 S1	07-27-2016	Chromium	113.2	ug/L		Y	EPA:200.8	
CAMO-16-124379	R-50 S1	07-27-2016	Chromium	110.6	ug/L		Y	EPA:200.8	
CAMO-16-124380	R-50 S1	07-27-2016	Chromium	113.2	ug/L		Ý	EPA:200.8	
CAMO-16-124381	R-50 S1	07-27-2016	Chromium	112.9	ug/L		Ý	EPA:200.8	
CAMO-17-127257	R-50 S1	11-18-2016	Perchlorate	0.6	ug/L		Ŷ	SW-846:6850	0.2
CAMO-17-127257	R-50 S1	11-18-2016	Chromium	117.0	ug/L		Ŷ	SW-846:6020	10.0
CAMO-17-127257	R-50 S1		Nitrate-Nitrite as Nitrogen	1.79	mg/L		Y	EPA:353.2	0.25
CAMO-16-110047	R-50 S2	02-09-2016	Perchlorate	0.3	ug/L		Ý	SW-846:6850	0.2
CAMO-16-110047	R-50 S2	02-09-2016	Chromium	4.0	ug/L	J	Y	SW-846:6020	10.0
CAMO-16-110047	R-50 S2		Nitrate-Nitrite as Nitrogen	0.45	mg/L	Ŭ	Y	EPA:353.2	0.05
CAMO-16-115286	R-50 S2	05-03-2016	Perchlorate	0.3	ug/L		Ý	SW-846:6850	0.2
CAMO-16-115286	R-50 S2	05-03-2016	Chromium	5.3	ug/L	J	Ŷ	SW-846:6020	10.0
CAMO-16-115286	R-50 S2		Nitrate-Nitrite as Nitrogen	0.53	mg/L	Ŭ	Y	EPA:353.2	0.25
CAMO-16-124301	R-50 S2	08-08-2016	Perchlorate	0.3	ug/L		Y	SW-846:6850	0.20
CAMO-16-124301	R-50 S2	08-08-2016	Chromium	3.9	ug/L	J	Ý	SW-846:6020	10.0
CAMO-16-124301	R-50 S2		Nitrate-Nitrite as Nitrogen	0.54	mg/L	Ŭ	Y	EPA:353.2	0.05
CAMO-17-127258	R-50 S2	11-18-2016	Perchlorate	0.3	ug/L		Y	SW-846:6850	0.00
CAMO-17-127258	R-50 S2	11-18-2016	Chromium	4.4	ug/L	J	Y	SW-846:6020	10.0
CAMO-17-127258	R-50 S2		Nitrate-Nitrite as Nitrogen	0.47	mg/L	Ŭ	Y	EPA:353.2	0.05
CrCH1-16-110478	CRPZ-1	02-08-2016	Chromium	431.2	ug/L		Y	EPA:200.8	0.00
CrCH2-16-110502		03-28-2016	Chromium	75.1	ug/L		Y	EPA:200.8	
CrCH2-16-110504		03-29-2016	Chromium	102.4	ug/L		N	EPA:200.8	
CrCH2-16-110505		03-30-2016	Chromium	105.4	ug/L		Y	EPA:200.8	
CrCH2-16-110506			Chromium	124.6	ug/L		Y	EPA:200.8	
CrCH2-16-110507			Chromium	128.7	ug/L		Y	EPA:200.8	
CrCH2-16-122092		06-07-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122093		06-07-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122094				10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122095		06-07-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122096		06-07-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122097		06-07-2016	Chromium	10.0	ug/L	U	Ý	EPA:200.8	
CrCH2-16-122098		06-07-2016	Chromium	10.0	ug/L	U	N	EPA:200.8	
CrCH2-16-122099		06-07-2016	Chromium	10.0	ug/L	U	N	EPA:200.8	
CrCH2-16-122000		06-07-2016	Chromium	10.0	ug/L	U	N	EPA:200.8	
CrCH2-16-122100		06-07-2016	Chromium	10.0	ug/L	U	N	EPA:200.8	
CrCH2-16-122101		06-07-2016	Chromium	10.0	ug/L	U	N	EPA:200.8	
5.0112 10-12210Z		06-08-2016		10.0	ug/L	U	Y	EPA:200.8	

Field Sample ID	Location ID	Sample Date	Parameter Name	Report Result	Report Units	Lab Qualifier	Filtered	Lab Method	Report Detection Limit
CrCH2-16-122104	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122105	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122106	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122107	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122108	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122109	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122110	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122111	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122112	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122113	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122114	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122115	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122116	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122117	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122118	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122119	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122120	CRPZ-2a	06-08-2016	Chromium	10.0	ug/L	U	Ŷ	EPA:200.8	
CrCH2-16-122121	CRPZ-2a	06-09-2016	Chromium	10.0	ug/L	U	Ý	EPA:200.8	
CrCH2-16-123303	CRPZ-2a	06-30-2016	Chromium	4.5	ug/L	0	Ý	EPA:200.8	
CrCH2-16-123304	CRPZ-2a	07-11-2016	Chromium	1.9	ug/L		Y	EPA:200.8	
CrCH2-16-123305	CRPZ-2a	07-13-2016	Chromium	14.5	ug/L		Y	EPA:200.8	
CrCH2-16-123306	CRPZ-2a	07-15-2016	Chromium	10.9	ug/L		Y	EPA:200.8	
CrCH2-16-123307	CRPZ-2a	07-18-2016	Chromium	11.9	ug/L		Y	EPA:200.8	
CrCH2-16-123308	CRPZ-2a	07-20-2016	Chromium	13.0	ug/L		Y	EPA:200.8	
CrCH2-16-123309	CRPZ-2a	07-22-2010	Chromium	17.4	ug/L		Y	EPA:200.8	
CrCH2-16-123310	CRPZ-2a	07-22-2010	Chromium	18.6	ug/L		Y	EPA:200.8	
CrCH2-16-123311	CRPZ-2a	07-23-2010	Chromium	17.7	ug/L		Y	EPA:200.8	
CrCH2-16-123312	CRPZ-2a	07-29-2016	Chromium	20.5	ug/L		Y	EPA:200.8	
CrCH2-16-123313	CRPZ-2a	08-01-2016	Chromium	25.0	ug/L		Y	EPA:200.8	
CrCH2-16-123314	CRPZ-2a	08-03-2016	Chromium	28.3	ug/L		Y	EPA:200.8	
CrCH2-16-123315	CRPZ-2a	08-05-2016	Chromium	20.3	ug/L		Y	EPA:200.8	
CrCH2-16-123316	CRPZ-2a	08-08-2016	Chromium	31.2	ug/L		Y	EPA:200.8	
CrCH2-16-123317	CRPZ-2a	08-10-2016	Chromium	34.7	ug/L		Y	EPA:200.8	
CrCH2-16-123318	CRPZ-2a	08-10-2010	Chromium	28.0	ug/L		Y	EPA:200.8	
CrCH2-16-123318 CrCH2-16-123319		08-12-2016	Chromium	33.4	ug/L		Y	EPA:200.8 EPA:200.8	
CrCH2-16-123320		08-17-2016	Chromium	29.7	ug/L		Y	EPA:200.8	
CrCH2-16-123321		08-19-2016	Chromium	47.7	ug/L		Y	EPA:200.8	
CrCH2-16-123321 CrCH2-16-123322		08-19-2016	Chromium	33.8	ug/L ug/L		Y	EPA:200.8	
CrCH2-16-123522 CrCH2-16-123545		08-22-2016	Chromium	53.3	ug/L ug/L		Y Y	EPA:200.8 EPA:200.8	
CrCH2-16-123545 CrCH2-16-123546		08-24-2016	Chromium	56.3	ug/L ug/L		Y Y	EPA:200.8 EPA:200.8	
CrCH2-16-123546 CrCH2-16-123547		08-29-2016	Chromium	46.8	ug/L ug/L		r Y	EPA:200.8 EPA:200.8	
CrCH2-16-123547 CrCH2-16-123548		08-29-2016	Chromium	39.8	ug/L ug/L		Y Y	EPA:200.8 EPA:200.8	
CrCH2-16-123548 CrCH2-16-123549		08-30-2016	Chromium	53.5	ug/L ug/L		Y Y	EPA:200.8 EPA:200.8	
CrCH2-16-123549 CrCH2-16-123550	CRPZ-2a	09-02-2016	Chromium	58.2	ug/L ug/L		Y	EPA:200.8	
CrCH2-16-123550	CRPZ-2a	09-07-2016	Chromium	61.3			Y	EPA:200.8 EPA:200.8	
				-	ug/L		Y Y		
CrCH2 16 123552		09-13-2016	Chromium	68.3	ug/L		Y Y	EPA:200.8	
CrCH2-16-123553		09-14-2016	Chromium	51.9	ug/L		Y Y	EPA:200.8	
CrCH2-16-123554		09-16-2016	Chromium	61.1	ug/L			EPA:200.8	
CrCH2-16-123555		09-19-2016	Chromium	49.6	ug/L		Y	EPA:200.8	
CrCH2-16-123556	UKPZ-2a	09-21-2016	Chromium	55.3	ug/L		Y	EPA:200.8	

Field Sample ID	Location ID	Sample Date	Parameter Name	Report Result	Report Units	Lab Qualifier	Filtered	Lab Method	Report Detection Limit
CrCH2-16-123557	CRPZ-2a	09-23-2016	Chromium	44.6	ug/L		Y	EPA:200.8	
CrCH2-16-123558	CRPZ-2a	09-26-2016	Chromium	59.3	ug/L		Y	EPA:200.8	
CrCH2-16-123559	CRPZ-2a	09-28-2016	Chromium	58.9	ug/L		Y	EPA:200.8	
CrCH2-16-123560	CRPZ-2a	09-30-2016	Chromium	53.8	ug/L		Y	EPA:200.8	
CrCH2-16-123561		10-03-2016	Chromium	62.4	ug/L		Y	EPA:200.8	
CrCH2-16-123562		10-05-2016	Chromium	33.6	ug/L		Y	EPA:200.8	
CrCH2-16-123563		10-07-2016	Chromium	37.1	ug/L		Y	EPA:200.8	
CrCH2-16-123564	CRPZ-2a	10-11-2016	Chromium	45.4	ug/L		Y	EPA:200.8	
CrCH2-16-123565	CRPZ-2a	10-12-2016	Chromium	54.2	ug/L		Y	EPA:200.8	
CrCH2-16-123566	CRPZ-2a	10-14-2016	Chromium	55.1	ug/L		Y	EPA:200.8	
CrCH2-16-123568	CRPZ-2a	10-19-2016	Chromium	70.8	ug/L		Y	EPA:200.8	
CrCH2-16-123569	CRPZ-2a	10-21-2016	Chromium	65.5	ug/L		Y	EPA:200.8	
CrCH2-16-123570	CRPZ-2a	10-24-2016	Chromium	73.9	ug/L		Y	EPA:200.8	
CrCH2-16-123571	CRPZ-2a	10-26-2016	Chromium	66.1	ug/L		Ý	EPA:200.8	
CrCH2-16-123572	CRPZ-2a	10-28-2016	Chromium	62.6	ug/L		Ŷ	EPA:200.8	
CrCH2-16-123573	CRPZ-2a	10-31-2016	Chromium	56.8	ug/L		Y	EPA:200.8	
CrCH2-16-123575	CRPZ-2a	11-04-2016	Chromium	56.1	ug/L		Y	EPA:200.8	
CrCH2-16-123576	CRPZ-2a	11-07-2016	Chromium	52.3	ug/L		Y	EPA:200.8	
CRCH2-16-110496	CRPZ-2b	02-22-2016	Chromium	46.9	ug/L		Y	EPA:200.8	
CRCH2-16-110490	CRPZ-2b	02-22-2010	Chromium	40.9	ug/L		Y	EPA:200.8	
CrCH2-16-110497	CRPZ-2b	02-24-2010	Chromium	36.1	ug/L		Y	EPA:200.8	
CrCH2-16-110498	CRPZ-2b	02-25-2016	Chromium	34.5	ug/L ug/L		Y	EPA:200.8	
CrCH2-16-110499 CrCH2-16-122122	CRPZ-2b	02-20-2010	Chromium	10.0	-	U	Y	EPA:200.8	
CrCH2-16-122122 CrCH2-16-122123	CRPZ-20 CRPZ-2b	06-09-2016	Chromium	10.0	ug/L ug/L	U	Y Y	EPA:200.8	
			-			U	r Y		
CrCH2-16-122124	CRPZ-2b	06-10-2016	Chromium	10.0	ug/L	0	Y Y	EPA:200.8	
CrCH2-16-122125	CRPZ-2b	06-15-2016	Chromium	7.7	ug/L		Y Y	EPA:200.8	
CrCH2-16-122126	CRPZ-2b	06-15-2016	Chromium	10.0	ug/L	U	Y Y	EPA:200.8	
CrCH2-16-122127	CRPZ-2b	06-15-2016	Chromium	10.0	ug/L	U	Y Y	EPA:200.8	
CrCH2-16-122128 CrCH2-16-122129	CRPZ-2b	06-15-2016	Chromium Chromium	10.0	ug/L	U	Y Y	EPA:200.8	
	CRPZ-2b	06-15-2016	-	10.0	ug/L			EPA:200.8	
CrCH2-16-122130	CRPZ-2b	06-15-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122131	CRPZ-2b	06-15-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122132	CRPZ-2b	06-15-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122133	CRPZ-2b	06-15-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122134	-	06-15-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122135		06-15-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122136	CRPZ-2b	06-15-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122137	CRPZ-2b	06-15-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122138		06-16-2016	Chromium	5.4	ug/L		Y	EPA:200.8	
CrCH2-16-122139	CRPZ-2b		Chromium	3.8	ug/L		Y	EPA:200.8	
CrCH2-16-122140	CRPZ-2b	06-16-2016	Chromium	4.6	ug/L		Y	EPA:200.8	
CrCH2-16-122141	CRPZ-2b	06-16-2016	Chromium	4.1	ug/L		Y	EPA:200.8	
CrCH2-16-122142	CRPZ-2b	06-16-2016	Chromium	4.9	ug/L		Y	EPA:200.8	
CrCH2-16-122143	CRPZ-2b	06-16-2016	Chromium	4.3	ug/L		Y	EPA:200.8	
CrCH2-16-122144	CRPZ-2b	06-16-2016	Chromium	4.4	ug/L		Y	EPA:200.8	
CrCH2-16-122145	CRPZ-2b	06-16-2016	Chromium	4.4	ug/L		Y	EPA:200.8	
CrCH2-16-122146	CRPZ-2b	06-16-2016	Chromium	4.5	ug/L		Y	EPA:200.8	
CrCH2-16-122147	CRPZ-2b	06-16-2016	Chromium	4.3	ug/L		Y	EPA:200.8	
CrCH2-16-122148	CRPZ-2b	06-17-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122149	CRPZ-2b	06-17-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	

Field Sample ID	Location ID	Sample Date	Parameter Name	Report Result	Report Units	Lab Qualifier	Filtered	Lab Method	Report Detection Limit
CrCH2-16-122150	CRPZ-2b	06-21-2016	Chromium	10.0	ug/L	U	Y	EPA:200.8	
CrCH2-16-122151	CRPZ-2b	07-28-2016	Chromium	118.4	ug/L		Y	EPA:200.8	
CrCH2-16-123041	CRPZ-2b	08-01-2016	Chromium	2.6	ug/L		N	EPA:200.8	
CrCH2-16-123038	CRPZ-2b	08-04-2016	Chromium	3.8	ug/L		Y	EPA:200.8	
CrCH2-16-123039	CRPZ-2b	08-11-2016	Chromium	2.7	ug/L		Y	EPA:200.8	
CrCH2-16-123040	CRPZ-2b	08-18-2016	Chromium	2.4	ug/L		Y	EPA:200.8	
CrCH2-16-123042	CRPZ-2b	09-09-2016	Chromium	2.3	ug/L		Y	EPA:200.8	
CrCH2-16-123043	CRPZ-2b	09-15-2016	Chromium	3.4	ug/L		Y	EPA:200.8	
CrCH2-16-123044	CRPZ-2b	09-22-2016	Chromium	3.6	ug/L		Y	EPA:200.8	
CrCH2-16-123045	CRPZ-2b	09-29-2016	Chromium	4.2	ug/L		Y	EPA:200.8	
CrCH2-16-123046	CRPZ-2b	10-06-2016	Chromium	3.3	ug/L		Ý	EPA:200.8	
CrCH2-16-123047	CRPZ-2b	10-13-2016	Chromium	3.0	ug/L		Ŷ	EPA:200.8	
CrCH2-16-123048	CRPZ-2b	10-20-2016	Chromium	2.3	ug/L		Ŷ	EPA:200.8	
CrCH2-16-123049	CRPZ-2b	10-27-2016	Chromium	1.0	ug/L	U	Ý	EPA:200.8	
CrCH3-16-110514	CRPZ-3	04-04-2016	Chromium	336.7	ug/L		Y	EPA:200.8	
CrCH3-16-110515	CRPZ-3	04-04-2016	Chromium	333.6	ug/L		Y	EPA:200.8	
CrCH3-16-110516	CRPZ-3	04-04-2010	Chromium	322.4	ug/L		Y	EPA:200.8	
CrCH3-16-110517	CRPZ-3	04-06-2016	Chromium	351.6	ug/L		Y	EPA:200.8	
CrCH4-16-110526	CRPZ-3	03-07-2016	Chromium	14.9	ug/L		Y	EPA:200.8	
CrCH4-16-110528	CRPZ-4	03-07-2010	Chromium	14.9	ug/L		Y	EPA:200.8	
CrCH4-16-110528	CRPZ-4	03-09-2016	Chromium	13.4	ug/L		Y	EPA:200.8	
CrCH4-16-110529	CRPZ-4 CRPZ-4	03-10-2016	Chromium	13.4	ug/L ug/L		Y	EPA:200.8	
CrCH4-16-110530	CRPZ-4 CRPZ-4	03-10-2016	Chromium	11.6	ug/L		Y	EPA:200.8	
CrCH5-16-110531	CRPZ-4 CRPZ-5	04-13-2016	Chromium	258.2	ug/L ug/L		Y	EPA:200.8	
CrCH5-16-110538	CRPZ-5 CRPZ-5	04-13-2016	Chromium	253.2	-		Y		
			-		ug/L		Y Y	EPA:200.8	
CrCH5-16-110542	CRPZ-5	04-15-2016	Chromium	252.9	ug/L		Y Y	EPA:200.8	4.0
CAMO-16-110048	R-61 S1	02-03-2016	Perchlorate	9.6	ug/L		Y Y	SW-846:6850	4.0
CAMO-16-110048	R-61 S1	02-03-2016	Chromium	23.2	ug/L		Y Y	SW-846:6020	10.0
CAMO-16-110048	R-61 S1		Nitrate-Nitrite as Nitrogen Perchlorate	1.68	mg/L		Y Y	EPA:353.2	0.25
CAMO-16-115288	R-61 S1	05-09-2016		10.1	ug/L			SW-846:6850	4.0
CAMO-16-115288	R-61 S1	05-09-2016	Chromium	26.7	ug/L		Y	SW-846:6020	10.0
CAMO-16-115288	R-61 S1		Nitrate-Nitrite as Nitrogen	2.27	mg/L		Y	EPA:353.2	0.5
CAMO-16-124302	R-61 S1	07-27-2016	Perchlorate	9.7	ug/L		Y Y	SW-846:6850	4.0
CAMO-16-124302	R-61 S1	07-27-2016	Chromium	17.9	ug/L			SW-846:6020	10.0
CAMO-16-124302			Nitrate-Nitrite as Nitrogen	2.00	mg/L		Y Y	EPA:353.2	0.25
CrEx-1-16-123267	CrEX-1	06-28-2016	Chromium	141.1	ug/L			EPA:200.8	
CrEx-1-16-123268	CrEX-1	06-29-2016	Chromium	151.5	ug/L		Y	EPA:200.8	
CrEx-1-16-123269	CrEX-1	06-30-2016		153.5	ug/L		Y	EPA:200.8	
CrEx-1-16-123270	CrEX-1	07-06-2016	Chromium	154.6	ug/L		Y	EPA:200.8	0.0
CrEx-1-16-123586	CrEX-1	07-06-2016	Perchlorate	0.8	ug/L		N	SW-846:6850	0.2
CrEx-1-16-123596	CrEX-1	07-06-2016	Chromium	152.2	ug/L		Y	EPA:200.8	
CrEx-1-16-123271	CrEX-1	07-12-2016	Chromium	163.4	ug/L		Y	EPA:200.8	0.0
CrEx-1-16-123587	CrEX-1	07-14-2016	Perchlorate	0.8	ug/L		N	SW-846:6850	0.2
CrEx-1-16-123597	CrEX-1	07-14-2016	Chromium	158.7	ug/L		Y	EPA:200.8	
CrEx-1-16-123272	CrEX-1	07-15-2016	Chromium	165.3	ug/L		Y	EPA:200.8	
CrEx-1-16-123273	CrEX-1	07-19-2016	Chromium	171.4	ug/L		Y	EPA:200.8	
CrEx-1-16-123588	CrEX-1	07-20-2016	Perchlorate	0.9	ug/L		N	SW-846:6850	0.2
CrEx-1-16-123598	CrEX-1	07-20-2016	Chromium	170.6	ug/L		Y	EPA:200.8	
CrEx-1-16-123274	CrEX-1	07-26-2016		170.7	ug/L		Y	EPA:200.8	
CrEx-1-16-123589	CrEX-1	07-27-2016	Perchlorate	0.7	ug/L		N	SW-846:6850	0.2

Field Sample ID	Location ID	Sample Date	Parameter Name	Report Result	Report Units	Lab Qualifier	Filtered	Lab Method	Report Detection Limit
CrEx-1-16-123599	CrEX-1	07-27-2016	Chromium	169.5	ug/L		Y	EPA:200.8	
CrEx-1-16-123275	CrEX-1	08-02-2016	Chromium	169.5	ug/L		Y	EPA:200.8	
CrEx-1-16-123590	CrEX-1	08-03-2016	Perchlorate	0.8	ug/L		N	SW-846:6850	0.2
CrEx-1-16-123600	CrEX-1	08-03-2016	Chromium	166.7	ug/L		Y	EPA:200.8	
CrEx-1-16-123276	CrEX-1	08-09-2016	Chromium	177.8	ug/L		Y	EPA:200.8	
CrEx-1-16-123591	CrEX-1	08-10-2016	Perchlorate	0.8	ug/L		N	SW-846:6850	0.2
CrEx-1-16-123601	CrEX-1	08-10-2016	Chromium	201.7	ug/L		Y	EPA:200.8	
CrEx-1-16-123455	CrEX-1	08-16-2016	Chromium	177.2	ug/L		Y	EPA:200.8	
CrEx-1-16-123592	CrEX-1	08-17-2016	Perchlorate	0.8	ug/L		N	SW-846:6850	0.2
CrEx-1-16-123602	CrEX-1	08-17-2016	Chromium	179.0	ug/L		Y	EPA:200.8	
CrEX-1-16-123456	CrEX-1	08-23-2016	Chromium	181.6	ug/L		Y	EPA:200.8	
CrEx-1-16-123594	CrEX-1	08-24-2016	Perchlorate	0.8	ug/L		N	SW-846:6850	0.2
CrEx-1-16-123604	CrEX-1	08-24-2016	Chromium	177.9	ug/L		Y	EPA:200.8	
CrEx-1-16-123457	CrEX-1	08-30-2016	Chromium	179.1	ug/L		Y	EPA:200.8	
CrEx-1-16-123595	CrEX-1	08-31-2016	Perchlorate	0.8	ug/L		N	SW-846:6850	0.2
CrEX-1-16-123605	CrEX-1	08-31-2016	Chromium	174.0	ug/L		Y	EPA:200.8	
CrEX-1-16-123458	CrEX-1	09-06-2016	Chromium	176.4	ug/L		Y	EPA:200.8	
CrEx-1-16-123593	CrEX-1	09-07-2016	Perchlorate	0.8	ug/L		N	SW-846:6850	0.2
CrEx-1-16-123603	CrEX-1	09-07-2016	Chromium	179.9	ug/L		Y	EPA:200.8	-
CrEX-1-16-123459	CrEX-1	09-13-2016	Chromium	178.2	ug/L		Y	EPA:200.8	
CrEX-1-16-126089	CrEX-1	09-14-2016	Perchlorate	0.8	ug/L		N	SW-846:6850	0.2
CrEx-1-16-126094	CrEX-1	09-14-2016	Chromium	177.8	ug/L		Y	EPA:200.8	•
CrEx-1-16-123460	CrEX-1	09-20-2016	Chromium	173.7	ug/L		Y	EPA:200.8	
CrEx-1-16-126088	CrEX-1	09-21-2016	Perchlorate	0.7	ug/L		N	SW-846:6850	0.2
CrEx-1-16-126095	CrEX-1	09-21-2016	Chromium	170.8	ug/L		Y	EPA:200.8	•
CrEx-1-16-123461	CrEX-1	09-27-2016	Chromium	176.0	ug/L		Ý	EPA:200.8	
CrEx-1-16-126090	CrEX-1	09-28-2016	Perchlorate	0.8	ug/L		N	SW-846:6850	0.2
CrEx-1-16-126093	CrEX-1	09-28-2016	Chromium	174.3	ug/L		Y	EPA:200.8	0.2
CrEx-1-16-123462	CrEX-1	10-04-2016	Chromium	188.5	ug/L		Y	EPA:200.8	
CrEx-1-16-126091	CrEX-1	10-05-2016	Perchlorate	0.8	ug/L		N	SW-846:6850	0.2
CrEx-1-16-126092	CrEX-1	10-05-2016	Chromium	193.0	ug/L		Y	EPA:200.8	•
CrEX-1-16-123463	CrEX-1	10-11-2016	Chromium	163.6	ug/L		Y	EPA:200.8	
CrEX-1-17-126995	CrEX-1	10-12-2016	Chromium	178.1	ug/L		Y	EPA:200.8	
CrEx-1-17-126999	CrEX-1	10-12-2016	Perchlorate	0.8	ug/L		N	SW-846:6850	0.2
CrEX-1-16-123464	CrEX-1	10-13-2016	Chromium	170.8	ug/L		Y	EPA:200.8	-
CrEx-1-16-123465	CrEX-1	10-18-2016	Chromium	176.4	ug/L		Y	EPA:200.8	
CrEx-1-17-126994	CrEX-1	10-19-2016	Chromium	174.3	ug/L		Y	EPA:200.8	
CrEx-1-17-126998	CrEX-1	10-19-2016	Perchlorate	0.8	ug/L		N	SW-846:6850	0.2
CrEX-1-16-123466	CrEX-1	10-20-2016	Chromium	169.4	ug/L		Y	EPA:200.8	-
CrEX3-16-116348	CrEX-3	05-05-2016	Chromium	126.3	ug/L		Y	EPA:200.8	
CrEX3-16-116349	CrEX-3	05-05-2016	Chromium	129.5	ug/L		Y	EPA:200.8	
CrEX3-16-116350	CrEX-3	05-05-2016	Chromium	139.9	ug/L		Y	EPA:200.8	
CrEX3-16-116352	CrEX-3	05-05-2016	Chromium	139.5	ug/L		Y	EPA:200.8	
CrEX3-16-116353	CrEX-3	05-05-2016	Chromium	129.2	ug/L		Y	EPA:200.8	
CrEX3-16-116354	CrEX-3	05-05-2016	Chromium	134.9	ug/L		Y	EPA:200.8	
CrEX3-16-116355	CrEX-3	05-05-2016	Chromium	128.9	ug/L		Y	EPA:200.8	
CrEX3-16-123277	CrEX-3	06-24-2016	Chromium	154.9	ug/L		Y	EPA:200.8	
CrEx3-16-123278	CrEX-3	08-12-2016	Chromium	140.4	ug/L		Y	EPA:200.8	
CrEX3-16-123279	CrEX-3	09-12-2016	Chromium	151.3	ug/L		Y	EPA:200.8	
CrEX3-16-123280	CrEX-3	09-13-2016	Chromium	155.0	ug/L	ł	Y	EPA:200.8	

Field Sample ID	Location ID	Sample Date	Parameter Name	Report Result	Report Units	Lab Qualifier	Filtered	Lab Method	Report Detection Limit
CrEX3-16-123281	CrEX-3	09-14-2016	Chromium	153.6	ug/L		Y	EPA:200.8	
CrEX3-16-123610	CrEX-3	09-14-2016	Perchlorate	0.9	ug/L		N	SW-846:6850	0.2
CrEx3-16-123625	CrEX-3	09-14-2016	Chromium	156.4	ug/L		Y	EPA:200.8	
CrEX3-16-123282	CrEX-3	09-15-2016	Chromium	156.4	ug/L		Y	EPA:200.8	
CrEX3-16-123283	CrEX-3	09-16-2016	Chromium	154.5	ug/L		Y	EPA:200.8	
CrEX3-16-123619	CrEX-3	09-16-2016	Chromium	153.8	ug/L		Y	EPA:200.8	
CrEX3-16-123284	CrEX-3	09-17-2016	Chromium	151.6	ug/L		Y	EPA:200.8	
CrEX3-16-123285	CrEX-3	09-18-2016	Chromium	155.5	ug/L		Y	EPA:200.8	
CrEX3-16-123286	CrEX-3	09-19-2016	Chromium	154.3	ug/L		Y	EPA:200.8	
CrEX3-16-123614	CrEX-3	09-20-2016	Perchlorate	1.0	ug/L		Ν	SW-846:6850	0.2
CrEX3-16-123622	CrEX-3	09-20-2016	Chromium	156.4	ug/L		Y	EPA:200.8	
CrEx3-16-124127	CrEX-3	09-20-2016	Chromium	159.2	ug/L		Y	EPA:200.8	
CrEx3-16-124128	CrEX-3	09-21-2016	Chromium	161.0	ug/L		Y	EPA:200.8	
CrEX3-16-124129	CrEX-3	09-22-2016	Chromium	172.7	ug/L		Y	EPA:200.8	
CrEX3-16-123618	CrEX-3	09-23-2016	Chromium	169.5	ug/L		Y	EPA:200.8	
CrEX3-16-124130	CrEX-3	09-23-2016	Chromium	165.3	ug/L		Y	EPA:200.8	
CrEX3-16-124131	CrEX-3	09-24-2016	Chromium	171.3	ug/L		Y	EPA:200.8	
CrEX3-16-124133	CrEX-3	09-25-2016	Chromium	171.5	ug/L		Y	EPA:200.8	
CrEX3-16-123608	CrEX-3	09-26-2016	Perchlorate	0.9	ug/L		N	SW-846:6850	0.4
CrEX3-16-123623	CrEX-3	09-26-2016	Chromium	171.9	ug/L		Y	EPA:200.8	••••
CrEX3-16-124134	CrEX-3	09-26-2016	Chromium	160.7	ug/L		Y	EPA:200.8	
CrEx3-16-124135	CrEX-3	09-27-2016	Chromium	172.9	ug/L		Ý	EPA:200.8	
CrEx3-16-124136	CrEX-3	09-28-2016	Chromium	168.8	ug/L		Ý	EPA:200.8	
CrEx3-16-124137	CrEX-3	09-29-2016	Chromium	169.5	ug/L		Ý	EPA:200.8	
CrEx3-16-124138	CrEX-3	09-29-2016	Chromium	171.3	ug/L		Ŷ	EPA:200.8	
CrEX3-16-123606	CrEX-3	09-30-2016	Perchlorate	0.1	ug/L	J	N	SW-846:6850	0.2
CrEX3-16-123616	CrEX-3	09-30-2016	Chromium	178.1	ug/L	Ű	Y	EPA:200.8	0.2
CrEx3-16-124139	CrEX-3	09-30-2016	Chromium	172.3	ug/L		Ŷ	EPA:200.8	
CrEX3-16-124140	CrEX-3	10-01-2016	Chromium	159.0	ug/L		Ŷ	EPA:200.8	
CrEX3-16-124141	CrEX-3	10-02-2016	Chromium	159.8	ug/L		Ý	EPA:200.8	
CrEx3-16-123617	CrEX-3	10-03-2016	Chromium	192.4	ug/L		Ý	EPA:200.8	
CrEX3-16-124142	CrEX-3	10-03-2016	Chromium	158.7	ug/L		Ý	EPA:200.8	
CrEX3-16-124143	CrEX-3	10-04-2016	Chromium	180.9	ug/L		Ý	EPA:200.8	
CrEX3-16-124144	CrEX-3	10-05-2016	Chromium	179.0	ug/L		Ý	EPA:200.8	
CrEX3-16-124145	CrEX-3	10-06-2016	Chromium	159.3	ug/L		Ŷ	EPA:200.8	
CrEX3-16-123621	CrEX-3	10-07-2016	Chromium	163.3	ug/L		Ý	EPA:200.8	
CrEX3-16-124146	CrEX-3	10-07-2016	Chromium	161.1	ug/L		Ý	EPA:200.8	
CrEX3-17-126956	CrEX-3	10-08-2016	Chromium	161.5	ug/L		Y	EPA:200.8	
CrEX3-17-126957	CrEX-3	10-09-2016	Chromium	161.5	ug/L		Y	EPA:200.8	
CrEX3-17-126958	CrEX-3	10-10-2016	Chromium	167.6	ug/L		Y	EPA:200.8	
CrEX3-16-123612	CrEX-3	10-11-2016	Perchlorate	0.9	ug/L		N	SW-846:6850	0.2
CrEX3-16-123624	CrEX-3	10-11-2016	Chromium	174.4	ug/L		Y	EPA:200.8	
CrEX3-17-126959	CrEX-3	10-11-2016	Chromium	172.7	ug/L		Ŷ	EPA:200.8	
CrEX3-17-126960	CrEX-3	10-12-2016	Chromium	191.2	ug/L		Ŷ	EPA:200.8	
CrEX3-17-126961	CrEX-3	10-12-2016	Chromium	179.9	ug/L		Ý	EPA:200.8	
CrEX3-17-126962	CrEX-3	10-12-2016	Chromium	182.0	ug/L		Y	EPA:200.8	
CrEX3-17-126964	CrEX-3	10-12-2016	Chromium	176.3	ug/L		Y	EPA:200.8	
CrEX3-17-126965	CrEX-3	10-12-2016	Chromium	179.3	ug/L		Y	EPA:200.8	
CrEX3-17-126966	CrEX-3	10-12-2016	Chromium	170.0	ug/L		Y	EPA:200.8	
CrEX3-17-127001	CrEX-3	10-12-2016	Chromium	15.6	ug/L		Y	EPA:200.8	

Field Sample ID	Location ID	Sample Date	Parameter Name	Report Result	Report Units	Lab Qualifier	Filtered	Lab Method	Report Detection Limit
CrEX3-17-127005	CrEX-3	10-14-2016	Perchlorate	0.1	ug/L	J	N	SW-846:6850	0.2
CrEX3-16-123620	CrEX-3	10-17-2016	Chromium	191.8	ug/L		Y	EPA:200.8	
CrEX3-17-126974	CrEX-3	10-17-2016	Chromium	174.9	ug/L		Y	EPA:200.8	
CrEX3-17-126975	CrEX-3	10-17-2016	Chromium	187.3	ug/L		Y	EPA:200.8	
CrEX3-17-126976	CrEX-3	10-18-2016	Chromium	190.0	ug/L		Y	EPA:200.8	
CrEX3-17-126977	CrEX-3	10-18-2016	Chromium	169.0	ug/L		Y	EPA:200.8	
CrEX3-17-126978	CrEX-3	10-18-2016	Chromium	168.5	ug/L		Y	EPA:200.8	
CrEX3-17-126979	CrEX-3	10-18-2016	Chromium	177.4	ug/L		Y	EPA:200.8	
CrEX3-17-126980	CrEX-3	10-18-2016	Chromium	168.9	ug/L		Y	EPA:200.8	
CrEX3-17-126981	CrEX-3	10-18-2016	Chromium	172.2	ug/L		Y	EPA:200.8	
CrEX3-17-126982	CrEX-3	10-18-2016	Chromium	175.1	ug/L		Y	EPA:200.8	
CrEX3-17-126983	CrEX-3	10-18-2016	Chromium	161.9	ug/L		Y	EPA:200.8	
CrEX3-17-126984	CrEX-3	10-19-2016	Chromium	177.8	ug/L		Y	EPA:200.8	
CrEX3-17-126985	CrEX-3	10-20-2016	Chromium	177.4	ug/L		Y	EPA:200.8	
CrEX3-17-127003	CrEX-3	10-21-2016	Chromium	181.7	ug/L		Y	EPA:200.8	
CrEX3-17-127007	CrEX-3	10-21-2016	Perchlorate	0.8	ug/L		N	SW-846:6850	0.2
CrEX3-17-127110	CrEX-3	10-21-2016	Chromium	180.5	ug/L		Y	EPA:200.8	0.2
CrEX3-17-127111	CrEX-3	10-22-2016	Chromium	183.7	ug/L		Y	EPA:200.8	
CrEX3-17-127112	CrEX-3	10-22-2010	Chromium	181.4	ug/L		Y	EPA:200.8	
CrEX3-17-127112	CrEX-3	10-23-2010	Chromium	182.3	ug/L		Y	EPA:200.8	
CrEX3-17-127002	CrEX-3	10-23-2010	Chromium	183.6	ug/L		Y	EPA:200.8	
CrEX3-17-127002	CrEX-3	10-24-2010	Chromium	182.5	ug/L		Y	EPA:200.8	
CrEX3-17-127114	CrEX-3	10-24-2010	Chromium	179.3	ug/L		Y	EPA:200.8	
CrEX3-17-127114	CrEX-3	10-23-2010	Chromium	183.8	ug/L		Y	EPA:200.8	
CrEX3-17-127110	CrEX-3	10-27-2010	Chromium	182.8	ug/L		Y	EPA:200.8	
CrEX3-17-127004	CrEX-3	10-28-2016	Perchlorate	0.9	ug/L ug/L		N N	SW-846:6850	0.4
CrEX3-17-127008	CrEX-3	10-28-2016	Chromium	187.5	ug/L ug/L		Y	EPA:200.8	0.4
CrEX3-17-127117 CrEX3-17-127118		10-28-2016	Chromium	183.5	ug/L ug/L		Y		
CrEX3-17-127118 CrEX3-17-127119	CrEX-3	10-29-2016	Chromium	187.1			Y Y	EPA:200.8	
	CrEX-3				ug/L		Y Y	EPA:200.8	
CrEX3-17-127120	CrEX-3	10-31-2016	Chromium Chromium	177.5	ug/L		Y Y	EPA:200.8	
CrEX3-17-127338	CrEX-3 CrEX-3	10-31-2016	-	187.9	ug/L		Y Y	EPA:200.8	
CrEX3-17-127122		11-02-2016	Chromium	175.4	ug/L		Y Y	EPA:200.8	
CrEX3-17-127123	CrEX-3	11-03-2016	Chromium	172.7	ug/L		Y Y	EPA:200.8	
CrEX3-17-127124	CrEX-3		Chromium	182.4	ug/L			EPA:200.8	
CrEX3-17-127336	CrEX-3	11-04-2016	Chromium	179.7	ug/L		Y	EPA:200.8	0.4
CrEX3-17-127341	CrEX-3	11-04-2016	Perchlorate	1.0	ug/L		N	SW-846:6850	0.4
CrEX3-17-127125	CrEX-3	11-05-2016	Chromium	180.1	ug/L		Y	EPA:200.8	
CrEX3-17-127126	CrEX-3	11-06-2016	Chromium	178.7	ug/L		Y	EPA:200.8	
CrEX3-17-127127	CrEX-3	11-07-2016	Chromium	178.5	ug/L		Y	EPA:200.8	
CrEX3-17-127337	CrEX-3	11-07-2016	Chromium	180.3	ug/L		Y	EPA:200.8	
CrIN1-16-124235	CrIN-1	07-19-2016	Chromium	87.2	ug/L		Y	EPA:200.8	
CrIN1-16-124236	CrIN-1	07-19-2016	Chromium	92.4	ug/L		Y	EPA:200.8	
CrIN1-16-124237	CrIN-1	07-19-2016	Chromium	65.5	ug/L		Y	EPA:200.8	
CrIN1-16-124238	CrIN-1	07-19-2016	Chromium	82.6	ug/L		Y	EPA:200.8	
CrIN1-16-124239	CrIN-1	07-20-2016	Chromium	86.3	ug/L		Y	EPA:200.8	
CrIN1-16-124240	CrIN-1	07-20-2016	Chromium	90.8	ug/L		Y	EPA:200.8	
CrIN1-16-124242	CrIN-1	07-20-2016	Perchlorate	0.7	ug/L		Y	SW-846:6850	0.2
CrIN1-16-124242	CrIN-1	07-20-2016	Chromium	82.5	ug/L		Y	SW-846:6020	10.0
CrIN1-16-124242	CrIN-1		Nitrate-Nitrite as Nitrogen	2.24	mg/L		Y	EPA:353.2	0.25
CrIN1-16-124807	CrIN-1	08-12-2016	Chromium	61.8	ug/L		Y	EPA:200.8	

Field Sample ID	Location ID	Sample Date	Parameter Name	Report Result	Report Units	Lab Qualifier	Filtered	Lab Method	Report Detection Limit
CrIN1-16-124808	CrIN-1	08-12-2016	Chromium	64.9	ug/L		Ν	EPA:200.8	
CrIN1-16-124809	CrIN-1	08-12-2016	Perchlorate	0.6	ug/L		Y	SW-846:6850	0.2
CrIN1-16-124809	CrIN-1	08-12-2016	Chromium	79.1	ug/L		Y	EPA:200.8	
CrIN1-16-124809	CrIN-1	08-12-2016	Chromium	72.2	ug/L	-	Y	SW-846:6020	10.0
CrIN1-16-124809	CrIN-1	08-12-2016	Nitrate-Nitrite as Nitrogen	2.04	mg/L	-	Y	EPA:353.2	0.25
CrIN1-16-126401	CrIN-1	09-22-2016	Chromium	80.3	ug/L	-	Y	EPA:200.8	
CrIN1-16-126426	CrIN-1	09-22-2016	Perchlorate	0.6	ug/L	-	Y	SW-846:6850	0.2
CrIN1-16-126426	CrIN-1	09-22-2016	Chromium	75.6	ug/L	-	Y	SW-846:6020	10.0
CrIN1-16-126426	CrIN-1		Nitrate-Nitrite as Nitrogen	2.11	mg/L		Y	EPA:353.2	0.25
CrIN1-16-126485	CrIN-1	09-22-2016	Chromium	76.8	ug/L		Y	EPA:200.8	
CrIN1-16-126486	CrIN-1	09-22-2016	Chromium	79.1	ug/L		Ŷ	EPA:200.8	
CrIN1-17-127582	CrIN-1	11-09-2016	Chromium	74.4	ug/L		Ŷ	EPA:200.8	
CrIN1-17-127583	CrIN-1	11-09-2016	Chromium	73.8	ug/L		Y	EPA:200.8	
CrIN1-17-127584	CrIN-1	11-09-2016	Chromium	77.1	ug/L		Y	EPA:200.8	
CrIN1-17-127589	CrIN-1 CrIN-1	11-09-2016	Perchlorate	0.7	ug/L ug/L		Y	SW-846:6850	0.2
CrIN1-17-127589	CrIN-1 CrIN-1	11-09-2016	Chromium	83.4	ug/L		Y	SW-846:6020	10.2
CrIN1-17-127589	CrIN-1 CrIN-1		Nitrate-Nitrite as Nitrogen	2.14	-		Y	EPA:353.2	0.25
CrIN1-17-127589 CrIN1-17-127637			-		mg/L		ř Y		0.25
	CrIN-1	11-09-2016	Chromium	57.6	ug/L		Y Y	EPA:200.8	
CrIN2-16-121998	CrIN-2	06-01-2016	Chromium	93	ug/L		-	EPA:200.8	
CrIN2-16-121999	CrIN-2	06-01-2016	Chromium	98	ug/L		Y	EPA:200.8	
CrIN2-16-122000	CrIN-2	06-01-2016	Chromium	93	ug/L		Y	EPA:200.8	
CrIN2-16-122002	CrIN-2	06-01-2016	Chromium	85	ug/L		Y	EPA:200.8	
CrIN2-16-122001	CrIN-2	06-02-2016	Chromium	100	ug/L		Y	EPA:200.8	
CrIN2-16-122009	CrIN-2	06-02-2016	Perchlorate	0.8	ug/L		N	SW-846:6850	0.2
CrIN2-16-122009	CrIN-2	06-02-2016	Chromium	106	ug/L		N	SW-846:6020	10.0
CrIN2-16-122023	CrIN-2	06-02-2016	Chromium	94	ug/L		Y	EPA:200.8	
CrIN2-16-124813	CrIN-2	08-12-2016	Chromium	89	ug/L		Y	EPA:200.8	
CrIN2-16-124814	CrIN-2	08-12-2016	Chromium	99	ug/L		Y	EPA:200.8	
CrIN2-16-124815	CrIN-2	08-12-2016	Perchlorate	0.9	ug/L		Y	SW-846:6850	0.2
CrIN2-16-124815	CrIN-2	08-12-2016	Chromium	102	ug/L		Y	EPA:200.8	
CrIN2-16-124815	CrIN-2	08-12-2016	Chromium	99	ug/L		Y	SW-846:6020	10.0
CrIN2-16-124815	CrIN-2	08-12-2016	Nitrate-Nitrite as Nitrogen	4.83	mg/L		Y	EPA:353.2	0.5
CrIN2-16-126439	CrIN-2	09-22-2016	Chromium	106	ug/L		Y	EPA:200.8	
CrIN2-16-126440	CrIN-2	09-22-2016	Chromium	105	ug/L		Y	EPA:200.8	
CrIN2-16-126441	CrIN-2	09-22-2016	Chromium	103	ug/L		Y	EPA:200.8	
CrIN2-16-126476	CrIN-2	09-22-2016	Perchlorate	0.8	ug/L		Y	SW-846:6850	0.2
CrIN2-16-126476	CrIN-2	09-22-2016	Chromium	112	ug/L		Y	SW-846:6020	10.0
CrIN2-16-126476	CrIN-2	09-22-2016	Nitrate-Nitrite as Nitrogen	4.76	mg/L		Y	EPA:353.2	0.25
CrIN2-17-127686	CrIN-2	11-09-2016	Chromium	86	ug/L		Y	EPA:200.8	
CrIN2-17-127687	CrIN-2	11-09-2016	Chromium	92	ug/L		Y	EPA:200.8	
CrIN2-17-127688	CrIN-2	11-09-2016	Chromium	93	ug/L		Y	EPA:200.8	
CrIN2-17-127689	CrIN-2	11-09-2016		91	ug/L		Y	EPA:200.8	
CrIN2-17-127691	CrIN-2	11-09-2016		0.9	ug/L		Y	SW-846:6850	0.2
CrIN2-17-127691	CrIN-2	11-09-2016		103	ug/L		Y	SW-846:6020	10.0
CrIN2-17-127691	CrIN-2		Nitrate-Nitrite as Nitrogen	4.74	mg/L		Y	EPA:353.2	0.5
CrIN3-16-125981	CrIN-3	09-08-2016	-	32.1	ug/L		Y	EPA:200.8	
CrIN3-16-125982	CrIN-3	09-08-2016		33.7	ug/L		Y	EPA:200.8	
CrIN3-16-125983	CrIN-3	09-08-2016		39.1	ug/L		Y	EPA:200.8	
CrIN3-16-125984	CrIN-3	09-08-2016		34.0	ug/L		Y	EPA:200.8	
CrIN3-16-125985	CrIN-3	09-08-2016		31.6	ug/L		Y	EPA:200.8	

Field Sample ID	Location ID	Sample Date	Parameter Name	Report Result	Report Units	Lab Qualifier	Filtered	Lab Method	Report Detection Limit
CrIN3-16-125986	CrIN-3	09-08-2016	Chromium	37.5	ug/L		Y	EPA:200.8	
CrIN3-16-125988	CrIN-3	09-09-2016	Perchlorate	0.6	ug/L		Y	SW-846:6850	0.2
CrIN3-16-125988	CrIN-3	09-09-2016	Chromium	43.6	ug/L		Y	SW-846:6020	10.0
CrIN3-16-125988	CrIN-3		Nitrate-Nitrite as Nitrogen	1.6	mg/L		Y	EPA:353.2	0.25
CrIN3-17-127593	CrIN-3	11-16-2016	Chromium	49.7	ug/L		Y	EPA:200.8	
CrIN3-17-127594	CrIN-3	11-16-2016	Chromium	48.1	ug/L		Y	EPA:200.8	
CrIN3-17-127595	CrIN-3	11-16-2016	Chromium	50.2	ug/L		N	EPA:200.8	
CrIN3-17-127597	CrIN-3	11-16-2016	Perchlorate	0.6	ug/L		Y	SW-846:6850	0.2
CrIN3-17-127597	CrIN-3	11-16-2016	Chromium	55.1	ug/L		Y	SW-846:6020	10.0
CrIN3-17-127597	CrIN-3		Nitrate-Nitrite as Nitrogen	1.6	mg/L		Y	EPA:353.2	0.25
CrIN3-17-127635	CrIN-3	11-16-2016	Chromium	47.5	ug/L		Y	EPA:200.8	
CrIN4-16-123239	CrIN-4	06-21-2016	Chromium	97.5	ug/L		Y	EPA:200.8	
CrIN4-16-123240	CrIN-4	06-21-2016	Chromium	94.3	ug/L		Ý	EPA:200.8	
CrIN4-16-123237	CrIN-4	06-22-2016	Chromium	96.2	ug/L		Ý	EPA:200.8	
CrIN4-16-123238	CrIN-4	06-22-2016	Chromium	99.9	ug/L		Ý	EPA:200.8	
CrIN4-16-123242	CrIN-4	06-22-2016	Chromium	98.2	ug/L		Ý	EPA:200.8	
CrIN4-16-123244	CrIN-4	06-22-2016	Perchlorate	0.6	ug/L		Y	SW-846:6850	0.2
CrIN4-16-123244	CrIN-4	06-22-2016	Chromium	97.8	ug/L		Y	SW-846:6020	10.0
CrIN4-16-123244	CrIN-4		Nitrate-Nitrite as Nitrogen	2.67	mg/L		Y	EPA:353.2	0.25
CrIN4-16-124978	CrIN-4	08-22-2010	Chromium	68.7	ug/L		Y	EPA:200.8	0.20
CrIN4-16-124979	CrIN-4	08-22-2010	Chromium	75.6	ug/L		Y	EPA:200.8	
CrIN4-16-124980	CrIN-4	08-22-2010	Chromium	74.2	ug/L		Y	EPA:200.8	
CrIN4-16-124980	CrIN-4	08-22-2010	Perchlorate	0.7	ug/L		Y	SW-846:6850	0.2
CrIN4-16-124981	CrIN-4	08-22-2010	Chromium	77.7	ug/L		Y	SW-846:6020	10.0
CrIN4-16-124981	CrIN-4 CrIN-4		Nitrate-Nitrite as Nitrogen	2.07	mg/L		Y	EPA:353.2	0.25
CrIN4-10-124981 CrIN4-17-127779	CrIN-4	11-28-2016	Chromium	72.5	ug/L		Y	EPA:200.8	0.25
CrIN4-17-127780	CrIN-4	11-28-2016	Chromium	72.3	ug/L		Y	EPA:200.8	
CrIN4-17-127781	CrIN-4	11-28-2016	Chromium	72.4	ug/L		Y	EPA:200.8	
CrIN4-17-127782	CrIN-4 CrIN-4	11-28-2016	Chromium	66.5	ug/L		Y	EPA:200.8	
CRIN5-16-124699	CrIN-4 CrIN-5	08-03-2016	Chromium	16.8	ug/L		Y	EPA:200.8	
CRIN5-16-124099	CrIN-5	08-03-2010	Chromium	15.9	ug/L		Y	EPA:200.8	
CRIN5-16-124698	CrIN-5	08-03-2010	Chromium	25.5	ug/L		Y	EPA:200.8	
CRIN5-16-124098	CrIN-5	08-04-2010	Chromium	43.6	ug/L		Y	EPA:200.8	
CRIN5-16-124700 CRIN5-16-124702	CrIN-5 CrIN-5	08-04-2016	Chromium	21.7	ug/L ug/L		Y	EPA:200.8	
CRIN5-16-124702 CRIN5-16-124703	CrIN-5 CrIN-5	08-04-2016		36.5	ug/L		Y	EPA:200.8	
CrIN5-16-124705	CrIN-5	08-04-2010	Perchlorate	0.9	ug/L		Y	SW-846:6850	0.2
CrIN5-16-124705	CrIN-5	08-04-2010		54.3	ug/L		Y	SW-846:6020	10.0
CrIN5-16-124705	CrIN-5		Nitrate-Nitrite as Nitrogen	2.46	mg/L		Y	EPA:353.2	0.25
CrIN5-16-125126	CrIN-5	09-01-2016	Chromium	3.9	ug/L		Y	EPA:200.8	0.25
CrIN5-16-125126 CrIN5-16-125127	CrIN-5 CrIN-5	09-01-2016	Chromium	3.9 2.4	-		Y Y	EPA:200.8 EPA:200.8	
CrIN5-16-125127 CrIN5-16-125128	CrIN-5 CrIN-5	09-01-2016		2.4	ug/L ug/L		Y Y	EPA:200.8 EPA:200.8	
CrIN5-16-125128 CrIN5-16-125139	CrIN-5 CrIN-5	09-01-2016		0.9	Ŭ		Y Y	SW-846:6850	0.4
CrIN5-16-125139 CrIN5-16-125139	CrIN-5 CrIN-5	09-01-2016		3.0	ug/L	U	Y Y	SW-846:6850 SW-846:6020	0.4
CrIN5-16-125139 CrIN5-16-125139	CrIN-5 CrIN-5		Nitrate-Nitrite as Nitrogen	1.67	ug/L	0	Y Y	EPA:353.2	0.25
			Chromium		mg/L		Y Y		0.20
CrIN5-17-127789	CrIN-5	11-29-2016	-	90.5	ug/L		Y Y	EPA:200.8	
CrIN5-17-127790	CrIN-5	11-29-2016	Chromium	87.0	ug/L		Y Y	EPA:200.8	
CrIN5-17-127791	CrIN-5	11-29-2016	Chromium	95.4	ug/L			EPA:200.8	
CrIN5-17-127792	CrIN-5	11-29-2016	Chromium	89.0	ug/L		Y	EPA:200.8	4.0
CAMO-16-110048	R-61 S1	02-03-2016	Perchlorate	9.6	ug/L		Y	SW-846:6850	4.0
CAMO-16-110048	R-61 S1	02-03-2016	Chromium	23.2	ug/L		Y	SW-846:6020	10.0

#### January 2016 - November 2016 Water-Quality Data from CrEX-1, CrEX-3, CrIN-1, CrIN-2, CrIN-3, CrIN-4, CrIN-5, R-15, R-28, R-42, R-43-S1, R-50-S1, R-50-S2, R-61, R-62, CrPZ-1, CrPZ-2a, CrPZ-2b, CrPZ-3, CrPZ-4, and CrPZ-5

Field Sample ID	Location ID	Sample Date	Parameter Name	Report Result	Report Units	Lab Qualifier	Filtered	Lab Method	Report Detection Limit
CAMO-16-110048	R-61 S1	02-03-2016	Nitrate-Nitrite as Nitrogen	1.68	mg/L		Y	EPA:353.2	0.25
CAMO-16-115288	R-61 S1	05-09-2016	Perchlorate	10.1	ug/L		Y	SW-846:6850	4.0
CAMO-16-115288	R-61 S1	05-09-2016	Chromium	26.7	ug/L		Y	SW-846:6020	10.0
CAMO-16-115288	R-61 S1	05-09-2016	Nitrate-Nitrite as Nitrogen	2.27	mg/L		Y	EPA:353.2	0.5
CAMO-16-124302	R-61 S1	07-27-2016	Perchlorate	9.7	ug/L		Y	SW-846:6850	4.0
CAMO-16-124302	R-61 S1	07-27-2016	Chromium	17.9	ug/L		Y	SW-846:6020	10.0
CAMO-16-124302	R-61 S1	07-27-2016	Nitrate-Nitrite as Nitrogen	2.00	mg/L		Y	EPA:353.2	0.25
CrCH3-16-110514	CRPZ-3	04-04-2016	Chromium	336.7	ug/L		Y	EPA:200.8	
CrCH3-16-110515	CRPZ-3	04-04-2016	Chromium	333.6	ug/L		Y	EPA:200.8	
CrCH3-16-110516	CRPZ-3	04-05-2016	Chromium	322.4	ug/L		Y	EPA:200.8	
CrCH3-16-110517	CRPZ-3	04-06-2016	Chromium	351.6	ug/L		Y	EPA:200.8	
CrCH4-16-110526	CRPZ-4	03-07-2016	Chromium	14.9	ug/L		Y	EPA:200.8	
CrCH4-16-110528	CRPZ-4	03-08-2016	Chromium	14.0	ug/L		Y	EPA:200.8	
CrCH4-16-110529	CRPZ-4	03-09-2016	Chromium	13.4	ug/L		Y	EPA:200.8	
CrCH4-16-110530	CRPZ-4	03-10-2016	Chromium	13.0	ug/L		Y	EPA:200.8	
CrCH4-16-110531	CRPZ-4	03-11-2016	Chromium	11.6	ug/L		Y	EPA:200.8	
CrCH5-16-110538	CRPZ-5	04-13-2016	Chromium	258.2	ug/L		Y	EPA:200.8	
CrCH5-16-110541	CRPZ-5	04-14-2016	Chromium	253.2	ug/L		Y	EPA:200.8	
CrCH5-16-110542	CRPZ-5	04-15-2016	Chromium	252.9	ug/L		Y	EPA:200.8	

Notes:

U means the analyte is classified as not detected.

J means the analyte is classified as estimated.

## Schematic of the IX Treatment System and Technical Specifications of the IX Vessels and Resin

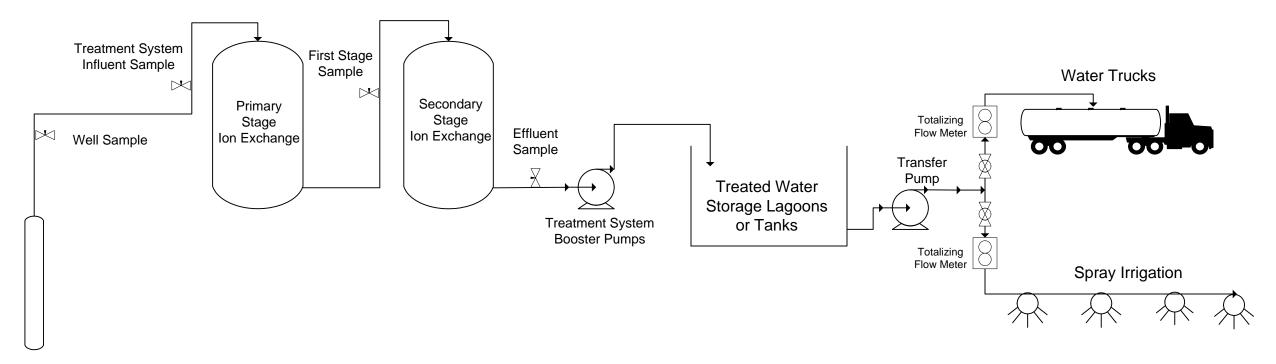
EPC-DO: 17-050

LA-UR-17-20362

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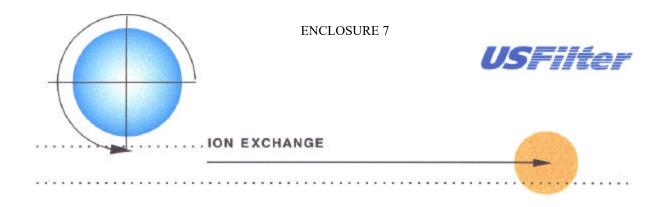
Date: MAR 1 6 2017

## LANL Chromium Ion Exchange Treatment System - CTUB



Extraction or Injection Well

EPC-DO: 17-050



## **USF A-284 ANION RESIN**

#### **Description:**

USF A-284 is a strong base Type I gel anion resin consisting of a styrene divinylbenzene matrix. The general appearance is a hard spherical bead which is amber in color. This resin has the ability to remove anions and weak acids from aqueous solutions, such as carbonic and silicic acids. This resin is particularly well-suited for low silica effluent requirements.

#### **Chemical Properties**

Ionic Form (as shipped) Moisture Content Exchange Capacity Kinetics Chloride 43 - 48% (Cl form) 1.4 meq / ml minimum (Cl form) > 15 megohm (USFilter Kinetics Test)

#### **Physical Properties**

Particle Screen Sizing +16 Mesh -50 Mesh Effective Size Whole Beads (%) Shipping Weight

5% maximum 1% maximum 0.45 - 0.60 mm 90 minimum 44 lbs. / cu. ft.

#### **Operating Conditions**

Operating pH Range Service Flow Rate Regenerant Flow Rate Rinse Flow Rate Rinse Volume Maximum Operating Temperature 0 to 14 2 - 4 gpm / cu. ft. 0.25 - 0.5 gpm / cu. ft. 0.25 - 0.5 gpm / cu ft. initially, then 1.5 gpm / cu. ft. 60 - 75 gallons / cu. ft. 140°F

#### **TECH SHEET MED-301**

