

Monthly Progress Report
Corrective Measures Study (CMS)/Corrective Measures Implementation (CMI)
for Consolidated Unit 16-021(c)-99
September 2007

This report summarizes Los Alamos National Laboratory (LANL) activities completed during August of fiscal year (FY) 2007 on the CMS/CMI for Consolidated Unit 16-021(c)-99, the TA-16-260 Outfall. Activities described in the CMS plan ([LA-UR-98-3918], approved by New Mexico Environment Department (NMED)-HWB on 9/8/99), and other related activities are described herein.

Description of Activities and Contacts

NMED Interactions – LANL and Department of Energy (DOE) representatives met with NMED representatives on September 12, 2007. The topic of the meeting was the “Evaluation of Suitability of Wells Near TA-16 for Monitoring Contaminant Releases from Consolidated Unit 16-021(c)- 99” and its recent Notice of Disapproval (NOD). LANL and DOE representatives discussed the NOD, and outlined their strategies for responding to NMED’s comments. Key points included the following. 1) The strategy for completing the statistical analysis of the monitoring well network. It was agreed that a focus on 95% detection probability for near-field wells was a reasonable strategy. 2) A need for LANL and DOE to improve the technical defensibility of actions proposed for each screen in each well. LANL and DOE agreed to include a new table that accomplished this. 3) A more detailed discussion of the rationale for handling long well screens. LANL and DOE agreed to provide a table that discussed each of these long screens.

RCRA Facility Investigation (RFI) Phase II Report and CMS Plan– No activities this month

Best Management Practices (BMPs) – BMPs are inspected quarterly and following significant precipitation events. There were numerous small precipitation events in September (two greater than 0.5 in); however, these did not require repair of BMPs in the 260 outfall area.

CMS Hydrogeologic Investigations– Hydrogeologic investigations include periodic water sampling as outlined in the Phase II RFI as well as continuing investigations delineated in the CMS plan. The ongoing spring sampling program, currently focused on capturing high-flow events, includes biannual sampling at Martin, SWSC, and Burning Ground Springs. These sampling activities are now being accomplished under the auspices of the interim facility-wide groundwater monitoring plan. All TA-16 groundwater monitoring locations were last sampled in May.

The hydrologic system in Cañon de Valle remains wet following the higher-than-average intensity monsoonal rains, significant November through January snows, and unusual May rainfall. Martin Spring is flowing at ~ 2 L/min.; Burning Ground Spring is flowing at a rate of ~0.5 L/ sec. After several years of being dry, SWSC Spring is flowing at a rate of ~0.1 L/sec.

The 90s Line Pond is wet as of the middle of August. Water is approximately 2 ft deep. Perched water was detected in a borehole located to the southeast of the 90s Line Pond during August and this borehole remained saturated throughout September. Downgradient surface locations in Martin Spring Canyon and Cañon de Valle are wet. The alluvial wells in lower Cañon de Valle and lower Martin Spring Canyon are wet. Surface water in Cañon de Valle is present from Burning Ground spring to beyond MDA-P.

Ecological Risk Pilot–

The ecological risk pilot study is complete; results are presented in the Phase III RFI Report.

CMS Bench and Pilot Studies– Write-up of bench and pilot studies, many of which were conducted under the auspices of the Innovative Technology Remediation Demonstration (ITRD) program, have been completed. The ITRD HE program was focused on two DOE sites: LANL and Pantex. Ongoing studies include:

1. A study of the passive barrier technology of Stormwater Management, Inc., potentially useful for removing HE and barium from waters (LANL).
2. A study of in situ anaerobic bioremediation of HE using gas-phase carbon additions (Pantex).
3. Oxidation, reduction, and in-situ bioremediation studies of groundwater contamination (Pantex).

The CMS Report from Pantex detailing these studies has been reviewed and results are incorporated in the CME report that was submitted to NMED on August 31, 2007.

Interim Measure (IM) –

The IM Report was approved by NMED in a letter dated January 13, 2003. No new activities occurred during this reporting period.

RFI/IR and CMS/CME Reports –

The surface system CMS Report was completed and submitted to NMED on November 26, 2003; the RFI Report was completed and submitted in September of 2003. A response to the NOD on the RFI Report was submitted on January 28, 2004 and an addendum to that NOD response was submitted on February 25, 2004. An approval with modifications for the RFI was received June 23, 2004, and a response to the approval was submitted to NMED on July 23, 2004. The RFI text modifications were completed during December 2004 and submitted to NMED. An NOD on the CMS Report was received May 16, 2005. A response to that NOD was submitted on June 15, 2005.

NMED issued the “Intent to Public Notice Remedy Selection for the Solid Waste Management Unit 16 021(c)” on May 15, 2006. Public comments on this notice were due to NMED by July 14, 2006. LANL provided comments on this public notice. The remedy was approved by NMED in a letter dated October 13, 2006.

The Investigation Report (IR) for TA-16 groundwater was completed and submitted to NMED on August 31, 2006. An approval with direction of this IR dated November 29, 2006 was received by e-mail the same day. This approval requires an additional report assessing the quality of the wells in and around TA-16. Additional information, including borehole videos and X-ray diffraction data, requested in this approval was provided to NMED in a letter dated January 17, 2007.

The TA-16 Well Evaluation Report was submitted to NMED on April 30, 2007. An NOD on this document dated August 15, 2007 was received on August 17, 2007. The response to that NOD was provided to NMED on September 30, 2007.

The Groundwater CME Report was submitted to NMED on August 31, 2007.

Corrective Measures Implementation (CMI) Plan –

The CMI Plan was submitted to NMED on May 10, 2007. An NOD on that document was received on June 29, 2007; the response to that NOD was submitted on July 30, 2007. NMED approved the CMI Plan in a letter dated August 17, 2007.

A field survey of SWSC spring was completed in September. An additional drawing of a Stormfilter installation in SWSC spring was completed.

Public and Stakeholder Involvement – None.

Percentage of CMS Completed

LANL estimates 100% of the surface CMS has been completed (please note this percentage does not reflect the deep groundwater CMS, which is still in progress)

Problems Encountered/Actions to Rectify Problems

None

Key Personnel Issues

None

Projected Work for October 2007

Investigation Reports and CMS/CME Reports

- Distribution of the NOD on the Well Evaluation Report

BMPs

- Continued inspection of existing BMPs following significant precipitation events

CMS Hydrogeologic Investigations

- Site maintenance at the TA-16 trailers
- Checking for presence and levels of water in Cañon de Valle alluvial system
- Precipitation monitoring

Ecological Risk Pilot

None

CMS Bench and Pilot Studies

None

CMI

- Submittal of drawings for Stormfilter installation in SWSC Spring
- Contracting for CMI Implementation

Public and Stakeholder Involvement

None