

Kielling, John, NMENV

From: Joni Arends [jarends@nuclearactive.org]
Sent: Wednesday, December 19, 2007 3:24 PM
To: Kielling, John, NMENV; dhawan.neelam@state.nm.us
Subject: MDA H

John and Neelam,

This morning the Northern NM Citizens' Advisory Board met to discuss the NMED remedy selection for MDA H. John Hopkins reported that LANL provided analytical data for TCE that LANL now recognizes was incorrect. Improved sampling methods for six quarters for the three sampling wells at MDA H showed lower levels of TCE. The new data doesn't show that vapor phase contamination will migrate down through the unsaturated zone to groundwater.

This is another example of LANL providing bad data for decision making purposes. Previous examples include radionuclides in Los Alamos County drinking water wells and accident scenario analyses for firefighters and other workers following a fire at LANL in the 1999 final LANL SWEIS and radionuclides in Los Alamos County and Santa Fe drinking water wells in the 2006 draft LANL SWEIS.

Further, Hopkins could not provide an example of where encapsulation has worked. He also admitted that the boreholes would wander apart at depth, thereby not providing complete encapsulation.

It is necessary for NMED to retract the MDA H remedy selection proposal at this time and require LANL to conduct additional characterization, such as:

1. install vapor wells at appropriate locations to sample vapors immediately beneath MDA H.
2. install characterization wells within 50 feet of MDA H with air rotary casing advance drilling method, the successful method used at the R-35 a and b wells.
3. install a background water quality well upgradient of MDA H, not greater than a distance of 500 feet. This well could also serve as the background water quality well for MDA L and MDA G.

Given these emerging issues, CCNS recommends that NMED withdraw the MDA H remedy selection. Please inform CCNS about NMED's plans with regard to MDA H remedy selection process. Thank you.

Joni

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