DEPARTMENT OF ENERGY
National Nuclear Security Administration
Los Alamos Site Office
Los Alamos, New Mexico 87544

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10/25/10

Mr. Ralph L. Phelps
Chairman
Northern New Mexico Citizens' Advisory Board
1660 Old Pecos Trail, Suite B
Santa Fe, New Mexico 87505

Dear Mr. Phelps:

Subject: Response to NNMCAB Recommendation 2010-05

The Department of Energy's Los Alamos Site Office has reviewed the Northern New Mexico Citizens' Advisory Board recommendation 2010-05. The Los Alamos Site Office response to the recommendation is provided in the attachment.

If you have any questions or concerns, you may contact M. Lee Bishop at (505) 606-1804 or Ed Worth at (505) 606-0398.

Sincerely,

George J. Rael
Manager
Environmental Projects Office

Attachment

cc w/attachment:
L. Bishop, EPO, LASO
E. Worth, EPO, LASO
M. Graham, ADEP, LANS
Records Center, LASO
Official Contract File, LASO

EPO:7MS-146-285360

ATTACHMENT:

In reference to NNMCAB Recommendation No. 2010-05:

"Recommendation for Interim Measure for Volatile Organic Constituent Contaminant Source Removal in MDA-L and MDA-G"

Recommendation No. 1.

"The NNMCAB recommends that DOE initiate an Interim Measure for source removal of VOCs from the subsurface of MDA-L prior to the implementation of a final remedy at the site."

Response:

DOE agrees with the NNMCAB recommendation to initiate an Interim Measure for source removal of VOCs at MDA L. Previous pilot studies at MDA L and MDA G have shown soil vapor extraction (SVE) to be effective in removing VOC vapors from the subsurface. In fact, the SVE unit used in the recent MDA G SVE pilot study has been procured and is available for use. A Corrective Measures Evaluation report is being prepared for MDA L that recommends SVE as part of the final remedy at MDA L.

Recommendation No. 2.

"The NNMCAB recommends that DOE consider initiating or maintaining as an Interim Measure the SVE system at MDA-G if the pilot test confirms the ability to remove substantial quantities of VOCs from the subsurface at MDA-G."

Response:

The SVE unit used in the recent MDA G SVE pilot study has been procured and is available for use. However, at this time, the urgency to perform an Interim Measure at MDA G, specifically to perform SVE, is uncertain. The VOC vapor concentrations at MDA G are much lower than what is currently seen at other locations, especially MDA L. A Corrective Measures Evaluation report is being prepared for MDA G that will evaluate the need for SVE as part of the final remedy at MDA G.

Recommendation No. 3.

"The NNMCAB recommends that implementation of a soil vapor extraction system should include appropriate criteria for terminating system operation in the event that the quantity of VOCs removed over time no longer meets the intent and cost effective goals of this recommendation."

Response:

DOE agrees with the NNMCAB that appropriate operational criteria are required. A Corrective Measures Evaluation report is being prepared for MDA L that recommends SVE as part of the

final remedy at MDA L. The CME includes criteria for moving from an active system to a passive system.

Recommendation No. 4.

"The NNMCAB recommends that DOE consider immediately implementing these Interim Measures for MDA-L and MDA-G in accordance with the 2005 Consent Order. Provisions are available in the Consent Order for DOE to implement such proven technologies for cleanup even without a final approval for the remedy from the NMED."

Response:

DOE agrees with the NNMCAB recommendation to initiate an Interim Measure for source removal of VOCs at MDA L. Previous pilot studies at MDA L and MDA G have shown soil vapor extraction (SVE) to be effective in removing VOC vapors from the subsurface. In fact, the SVE unit used in the recent MDA G SVE pilot study has been procured and is available for use.