



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

April 30, 1992

Steve Slaten
U.S. Department of Energy
Los Alamos Area Office
528 35th Street
Los Alamos, NM 87544
505-667-5105

Subject: Comments on LANL ADS for FY '94-'98

Dear Mr. Slaten,

Thank you for the expedient delivery of the Activity Data Sheets (ADS). The HRMB has reviewed the ADS and would like to submit the following comments pertaining to their content.

1) It was noted that on several of the ADS that EPA is considered the regulatory driver for mixed waste issues at LANL. The state does, however, have mixed waste authority. Units that manage mixed waste are/will be regulated under state RCRA authority.

2) ALLA-1086 makes reference to the use of "a consistent technical approach to site characterization" that utilizes "framework and risk assessment studies" to be completed under ADS-2105. "Risk assessment" and "quality assurance" are being developed at LANL as part of activities detailed in ADS-2105. The NMED points out that development of risk assessment and quality assurance/quality control procedures should be coordinated with the NMED in order to ensure criteria that are acceptable to the NMED.

3) Also in ALLA-2105, it is stated that "long-term data on hydrological performance of landfill covers... will be used for precise calibration of water balance models for LANL to assist in field scale design of covers and performance assessment". The NMED points out that although results of studies like the one described above will be considered, landfill covers will be evaluated on a site-specific basis and will differ from site to site.



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The HRMB's comments should be incorporated into the final ADSs.
If you have any questions, please contact Danny Katzman of my
staff at 827-4300.

Sincerely,

Original Signed by B.G.

Benito Garcia, Chief
Hazardous and Radioactive Materials Bureau

BG/dk

cc: Bruce Swanton
Ed Horst
John Parker
Danny Katzman

1/LANL/ADS