

General

Reading File

M E M O R A N D U M

To: File, LANL Red 93
From: Danny Katzman, DOE Oversight Program
Date: February 11, 1993
Subject: **January's Monthly Environmental Restoration Meeting**

This memo serves to summarize the monthly Environmental Restoration (ER) meeting held in Dallas, TX on January 29, 1993. This summary is derived from my notes and will supplement and/or clarify the official meeting notes that will be supplied by Kelly Bittner, DOE/Albuquerque Field Office. The meeting agenda and list of attendees is attached.

The next meeting will be held in Albuquerque on February 25 at the BDM Building on Kirtland AFB. The meeting will run from 8 A.M. until 2 P.M. at which time a demonstration on the "WEDID" will occur. WEDID is a waste treatment procedure that is useful for addressing the Land Ban issue. SNL may ultimately apply for an RD & D permit for this procedure.

LANL is proposing a demonstration of their mobile laboratory on Monday, February 22.

PERMIT MOD STATUS

The permit modification deadline was January 15 and was not met. The DOE is re-thinking their approach on whether to include the removal of SWMUs from the permit in this permit modification.

Steve Slaten: There are several possibilities for how to proceed and achieve the goals of the proposed modification:

- 1) On May 23, the EPA could write a letter giving the DOE permission for staggered submittal of Work Plans.
- 2) DOE could submit a modification only requesting staggered submittals of Work Plans.
- 3) DOE could submit a modification adding 483 SWMUs and requesting staggered Work Plans.

Slaten pointed out that SWMUs proposed for No Further Action (NFA) in the 1993 round of Work Plans are equivalent to the deletions slated for the Permit modification. It was suggested that the DOE and EPA resolve where the documentation for elimination of these SWMUs should appear. "No need to be redundant."



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Barbara Driscoll stated that the EPA would not do option 1 above. Barbara's highest priority is DOE's justification for deleting the RCRA units from the Permit. Second priority is HWSA unit removal justification .

DOE/LANL will submit information on the roughly 45 units that are subject to non-HWSA RCRA requirements justifying their removal from the HWSA Permit.

Slaten favors a permit modification that will include the staggered schedule request, addition of the 438 SWMUs, and **maybe** deletion of the 45 RCRA units.

Driscoll suggested that the next step be the deletion of SWMUs from the list in the HWSA Permit. She preferred that those SWMUs (most of which are included in the 1993 round of Work Plan submittals) be pulled from the Work Plans prior to submittal and compiled in a separate request for deletion.

Sue Umshler asked if SNL should also look into staggering their Work Plans.

Driscoll has issued an NOD on OU 1144 (TA-49). She said it was substantial and expected that the DOE would request an extension.

Work Plans for OUs 1078 and 1071 have been approved by the EPA.

Barbara Driscoll said that a typical problem in the Work Plans for OUs 1079 and 1147 is the length of time before RFI Reports will be submitted.

Paul Aamodt said that the current problem and reason for slow RFI Reports is that there is 10 month turn-around time for analytical data from both contract labs and LANL's own lab.

Slaten: "VMAX" is being removed from the Bayo Canyon portion of the OU 1079 Work Plan. The OU Project Leader said that VMAX is no longer considered valid and will instead use a standard judgemental sampling procedure. The revised sampling plan will be submitted by February 20. The original thought on VMAX was that drilling would be in "hot" areas and hence expensive, and that removal would be cheap. Therefore, there would be a point at which less effort on investigation and more effort on removal would be economically justified. This has not proven to be the case.

The Work Plan for OU 1078 will contain an attached subsurface investigation to be conducted in Phase 1. This is in response to both EPA and State AIP concerns that not enough subsurface work is being done in the early stages. This subsurface plan will be

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submitted to the EPA and State in late February.

MERCURY SWMU, 3-010

Danny Katzman: DOE/LANL will receive the State's comments on the Sampling and Remediation Plan for SWMU 3-010 in the next few days. I also stressed that the initial plan that DOE/LANL submitted was overkill for the scale of this SWMU and that if DOE/LANL had worked more closely with the the State and EPA during the development of the Work Plan, the whole process could have been streamlined and likely completed already. Everyone agreed!

Dave Neleigh: There could be a "potential mess" if the facility and regulators haven't made it clear who has lead on a specific issue. The regulators don't want to give conflicting directions. This will be very important in the upcoming RCRA unit issue.

STATUS OF MIXED WASTE STORAGE AND DISPOSAL FACILITY

A NEPA determination will determine which is more appropriate, an Environmental Assessment or Environmental Impact Study. This may be determined by March 1.

Slaten: The DOE has not yet determined what percentage of the waste will be ER-generated waste.

The Lab is still awaiting DOE comments on the conceptual design. The next step is Title 1 design, hopefully by August.

UPDATE ON QUARTERLY PUBLIC MEETING

Both Los Alamos and Santa Fe was well attended. The main issues of concern were; water in the borehole at TA-49, MWSDF cover integrity, and "debris classification" (?).

DESTINY OF ER-GENERATED WASTES AT SNL AND LANL

Katzman: Where will ER wastes be stored or disposed of in the interim?

Slaten/Umschler: 1). Wastes might be stored onsite under the CAMU option or treated when appropriate. This is a very serious problem at both LANL and SNL. At LANL, Townsite SWMUs will be remediated regardless of whether a permanent

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disposal site exists or not. In the interim, TA-54 domes do have limited space, and at SNL, the storage site at the MWL has some space, but drums at that site are subsiding.

SAMPLE NOTIFICATION

EM-13 proposes to send a fax weekly that update all planned field work.

Katzman: Can this be done more efficiently electronically? This could be done through the Oracle system. Bruce Swanton is working on this with Lars Sohlt. This may also be appropriate for the FIMAD system.

DESIGNATION OF POINT OF CONTACT FOR NMED

Slaten: The DOE/LAAO is still confused as to who the official point of contact is for the AIP and NMED. Who is the point of contact for coordination of AIP staff in different bureaus? Should correspondence be going through Benito Garcia? or Bruce Swanton? or Kathleen Sisneros? Should reports should be sent to Benito Garcia with cover letters w/o attachments sent to Kathleen Sisneros?

Katzman: I'll get back to you. In the mean time, continue as you have in the past; Send to Kathleen Sisneros and Bruce Swanton.

Stoddard: Recommended using Benito Garcia.

TOWNSITE ISSUES AT LOS ALAMOS

Update On Boring Program (LA Inn Parking Lot Activities)

Slaten: All proposed holes were drilled. One hole had a total depth of 70'. None of the samples showed rad or organic vapor hits from screening. More pre-construction investigation is planned.

Update on Pistol Firing Range

Slaten: All land surrounding the Firing Range was traded back to the Forest Service. The DOE is projecting that it will be 3-4 years before remediation. The projected remediation date was recently presented to Regional Forester Jolly in Albuquerque for his comments.

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Update on mercury sampling at Hillside 138.

Slaten: Results from the EPA's splits show up to several hundred ppm mercury. These results appear to verify LANL's results and appears to confirm the colocation hypothesis.

SWMU ACCOUNTING: DO NFA SWMUs COUNT TOWARD SWMU PERCENTAGES IN THE PERMIT?

Driscoll: Yes. NFAs do count in the percentages required in the HWSA Permit.

AIP FIELD OVERSIGHT ISSUES:

NMED Role

Katzman: Technical comments made onsite by AIP staff during oversight activities do not have regulatory impact. All AIP recommendations that involve RCRA/HWSA units will ultimately have to be considered by the State's enforcement section.

Slaten/Aamodt: We understand that. However, we view the AIP technical comments as very valuable, as another technical perspective trying to achieve the same goals.

Photography

Slaten: The photography issue is not easily resolved. There are simply some sites where State cameras will not be allowed. This has been a drawn out issue. Slaten suggested that Neil Weber write the DOE's State AIP coordinator to consider conditional record for photography permission.

Sampling Notification

Warren Cox and Robert Vocke are working on a standardized form for sampling notification. Katzman recommended that it include the date for "readiness reviews". Katzman said the State would submit input to Warren Cox early next week. Cox: The goal is to have a final draft by the next meeting.

TIMING OF STATE AND PUBLIC INPUT ON ACTIVITY DATA SHEETS

Umschler: Prioritization is the main part of the ADS that State and Public should have input on and that this should occur via public meetings on the 5-year plan.

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RESULTS OF EPA KEYSTONE ADVISORY GROUP

Neleigh: Many federal agencies took part in the negotiations. Determination was that site-specific advisory boards should be set up at federal facilities. It applies primarily to large defense facilities. It is mandatory at CERCLA sites and optional and recommended at RCRA sites. The advisory group would be deemed appropriate if 50 people requested it. Representatives would be comprised only of non-facility affiliated citizens. Funding for the advisory boards would be based on a facilities total environmental restoration expenditures for 1 year. If > 100 mil/yr, then the DOE will fund the committee 350k/yr. If < 50 mil/yr, then the fund will be 150k/yr. The fund will essentially be pro-rated. Dave Neleigh will mail out either the summary or the full booklet describing the finding soon.

SHARED FACILITY/STATE ER ORACLE DATABASE

No one at the meeting had much knowledge about progress on this issue. Warren Cox felt that all these applications will be incorporated in the FIMAD work station mode. Cox and Vocke are working with GIS experts at LANL on setting up a common architecture for both facilities. Greg Cole at LANL is Warren Cox's counterpart on this issue.

TURN-AROUND TIME FOR FACILITY RESPONSES TO AIP COMMENTS

The turn-around time for LANL is being modified in the HWSA permit from 30 days to 60 days. The DOE's feeling is that they could meet similar times for the AIP comments, especially if they receive AIP and EPA comments within a reasonable time of each other.

PROTOCOL FOR SETTING UP MEETING BETWEEN AIP STAFF AND OUPLS

Slaten thought that this had been resolved. Informal interaction is not an issue. Otherwise, meeting and tasks that require more than 2 hours, or that are potentially controversial, should go the DOE/LAAO (Diana Webb). Document requests should go through the DOE/LAAO.

WORK STATION UPDATE

The current plan is for 1 station in Santa Fe and 1 in the AIP

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office at Kirtland. AIP staff at LANL will have access to the station in the ER Reading Room in Los Alamos.

cc: Neil Weber, Chief, DOE Oversight Program
Benito Garcia, Chief, HRMB
Barbara Hoditschek, Manager, RCRA Permits
Barbara Driscoll, EPA Region 6

*Program file
Danny Katzman*