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U.S.EPA - REGION 6
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**Comments on Department of Energy ADS Submittals
Fiscal Year 1997 Environmental Management**

Los Alamos National Laboratory

General Comments:

1. Field studies for landfill covers appears under several ADS's (Field Units 1 and 5, and ADS 2105) and this may need to be consolidated under one program.
2. ADS 2107 - Project Management costs are extremely high in comparison to actual project costs. The target spending level of 12,920K is almost half what all the actual field unit projects are costing. DOE must address these exorbitant costs and bring into line with what other contractors are charging for management.

ADS management costs appear on each ADS and are very large. Why are these costs not associated with ADS 2107 related to Environmental Restoration Management?

3. Field Units 2 and 3 appear to be funded at a higher rate than the higher priority Field Units 4 and 5. Funding should reflect site prioritization.
4. ADS 3001 - The budget for Decontamination and Decommissioning does not appear to have been cut as drastically as the Environmental Restoration budget. This area should be receiving a more substantial budget cut and should be a lower priority than field unit investigations.

Specific Comments:

1. Field Unit 1 - ADS management costs appear to be very high in relation to other items.
2. LANL Field Unit 2 - Where is MDA Y and what is its priority?
3. Field Unit 3 - Under Budget Year (FY 1996) Description, LANL indicates that Phase I sampling at TA-46 will be completed. Completion of Phase I sampling at TA-46 is also indicated for FY 97. If sampling is projected to be completed in FY 96 then it should not be projected for FY 97 also.

Based on the Site Ranking System, TA-46 has more high priority sites than TA-33, and the bulk of the work conducted at this Field Unit should be at the higher priority sites. Scheduling should indicate submittal of RFI Reports for TA-46 in FY 97.

4. Field Unit 4 - Completion of the RFI Report for TA-2 should not cost 50K more under target than under decrement spending levels. The costs of the RFI Reports for TA-2 and 41 seem

excessive considering that there are nine and four HSWA units per TA respectively.

No units from TA-68 are in the HSWA permit; therefore, unless these are high priority units they should not be prioritized before HSWA required work. Is this a typo and should it be TA-63? TA-63 has two low priority HSWA SWMUs and a report should not be as expensive as indicated in the ADS. The majority of units in TA-35 are high priority units and should be funded first.

5. **Field Unit 5** - Under the decrement level spending, LANL is indicating that work at Fenton Hill will be funded. Currently, work at Fenton Hill does not have an EPA/NMED regulatory driver, and should not have higher priority than work under the HSWA permit. The 300K associated with this site should be used for other investigative work at high priority sites within this field unit.
6. **High Explosive Waste Water Treatment**

Funding appears adequate.

Sandia National Laboratories

General Comments:

1. DOE/Sandia has assumed that their 22 current no further action proposals will be approved without the need for additional investigation(s), and that the voluntary corrective measures will be accepted as final remedies without the need for any additional remediation.
2. Many of the areas that were classified as "high priority" by the Site Ranking System still do not show accelerated investigative schedules. In fact, several medium and low-priority areas appear to be funded for a faster investigation.

Specific Comments:

1. Tech Area 1 (high-priority area)

The RFI Work Plan for Tech Area I was submitted to the EPA on March 24, 1995. It is currently being reviewed and approval is anticipated by June 1995, at which point regulatory milestones will be imposed.

It appears that DOE has funded the necessary RFI activities for FY 97, including soil borings and monitor well installations.

2. Tech Areas III and V (medium priority)

The RFI Report for Tech Areas III and V will be completed

during FY 96. DOE has included decrement funding for the preparation of a CMS Report during FY 97.

3. Septic Tanks and Drainfields (low priority)

RFI Report will be prepared during FY 97. It appears that DOE has funded the necessary RFI activities, despite the fact that this OU is considered low priority.

4. Mixed Waste Landfill (medium priority)

RFI Report will be prepared during FY 97. It appears that DOE has funded the necessary RFI activities.

5. Tech Area II (high priority)

Many of the sites in Tech Area II have been proposed for No Further Action (NFA), or have undergone Voluntary Corrective Measures (VCMS). Decrement-level funding for FY 97 appears to be based upon the assumption that the NFA proposals will be approved, and the VCMS will serve as final remedies, without the need for additional investigative or remedial activities. The EPA is concerned that the proposed FY 97 decrement level may not allow for the completion of additional environmental activities, including the preparation of an RFI Work Plan, if they are determined to be needed.

6. Tijeras Arroyo (high priority)

Many of the sites contained in this OU have or will be proposed for NFA. If the sites are not approved for NFA, additional activities may be needed, including the submittal of an RFI Work Plan. These activities have not been funded at the decrement level for FY 97 or the outyears. This is of particular concern since this is a high-priority OU.

7. Site-Wide Characterization

Computer modeling of groundwater, etc. has not been funded at the decrement level for FY 97. This could result in a deficiency.

8. Foothills Test Area (high priority)

The EPA would like to see the overall schedule for this high-priority OU accelerated. This could include some additional decrement-level funding to initiate preparation of an RFI Report during FY 97.

9. Canyons Test Area (medium priority)

It appears that DOE has funded the necessary RFI activities.

10. Central Coyote Test Area (low priority)

It appears that DOE has funded the necessary RFI activities.

11. SW Test Area (low priority)

It appears that DOE has funded the necessary RFI activities.

12. Liquid Waste Disposal System (low priority)

It appears that DOE has funded the necessary RFI activities, although DOE has assumed that all three sites will be approved for NFA without the need for any additional characterization.

13. Leaking USTs

This ADS is inactive and therefore requires no funding, as is indicated by the DOE data sheet.

14. Facility Operations and Maintenance

It appears that DOE has funded the necessary operations and maintenance activities at the decrement level, albeit with the potential for adverse impacts (as noted on the first page of the ADS).

15. Chemical Waste Landfill (NMED lead)

It appears that DOE has funded the necessary RFI activities.

South Valley Superfund Site Rem

Activities described appear adequate.

Note: The Activity Data Sheets for the Salton Sea Test Base, Tonopah Test Range, SNL Engineering Reactor, GPP Waste Management, and the Kauai Test Facility were not reviewed by EPA.