

# Los Alamos

NATIONAL LABORATORY

*Environmental Management Programs*  
Environmental Restoration MS M992  
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(505) 665-4557  
FAX (505) 667-3395

Date: April 21, 1995

Refer to EM/ER:95-157

*Barbara H  
Was at meeting.*

*file LANL  
HSWA II*

*HSWA permit GEN/MSU/6*

Ms. Barbara Driscoll  
NM/Federal Facilities Section  
Environmental Protection Agency  
Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

Dear Ms. Driscoll:

**SUBJECT: ACCELERATED CLEANUP PROCESS**

Enclosed please find Los Alamos National Laboratory's Policy Statement for accelerated cleanup process. These Policies are developed by the Environmental Restoration Program's (ER) Project Consistency Team. The team is made up of the Department of Energy, ER Program personnel as well as personnel from the University of California's Environmental Restoration Project and Hazardous and Solid Waste Group. As you are aware we have been working with you and staff from the New Mexico Environmental Department, in the development of this policy.

The Policy discusses two remediation strategies designed to allow quick removal of contamination reducing health and environmental risks associated with past Laboratory operations. The two strategies include voluntary corrective actions (VCAs) and expedited clean-ups (ECs). The VCA process addresses small-scale sites with no controversial issues or which merely involve good facility management practices, while the EC process addresses sites on the HSWA permit. More complex sites that are likely to require CMS will not follow this accelerated clean up process.

Should you have any questions regarding this policy, please feel free to contact Dave McInroy at (505) 667-0819 or Court Fesmire at (505) 665-4718 of our staff.

Sincerely,

Jorg Jansen, Project Manager  
Environmental Restoration

Sincerely,

Ted Taylor, DOE/LAAO,  
Environmental Restoration, Project Manager

*TU*



JJ:TT:am

Enclosure: Los Alamos National Laboratory Policy Statement

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# Los Alamos National Laboratory

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*Date:* April 4, 1995  
*Refer to:* EM/ER:95-PCT-016

## **SUBJECT: ACCELERATED CLEANUP PROCESS**

### **STATEMENT OF ISSUE**

The Los Alamos National Laboratory (the Laboratory) Environmental Restoration (ER) Project, the US Environmental Protection Agency (EPA) Region 6, and New Mexico Environment Department (NMED) have been working together to improve processes designed to accelerate the cleanup of historical waste sites. These processes will allow for the quick removal of contamination, reducing health and environmental risks associated with past Laboratory operations. The accelerated cleanup of these sites will minimize costs while enhancing schedule performance of the Laboratory's ER Project by removing sites from the Resource Conservation and Recovery Act Facility Investigation /Corrective Measure Study (CMS) process in early stages. Currently, the ER Project estimates that over 90% of the potential release sites (PRSs) that do not qualify for a no further action (NFA) determination will be investigated and/or remediated following an accelerated cleanup process. The two remediation strategies designed to implement accelerated cleanup of sites at the Laboratory are voluntary corrective actions (VCAs) and expedited cleanups (ECs). The VCA process addresses small-scale sites with no controversial issues or which merely involve good facility management practices, while the EC process addresses Hazardous and Solid Waste Amendments (HSWA)-permitted sites with more complex issues that may require risk-based cleanup decisions. The remaining PRSs will likely require a full CMS.

### **SUMMARY OF POLICY**

The ER Project will use one of the two remediation strategies, voluntary corrective action or expedited cleanup, described in detail below, to implement the accelerated cleanup process.

### **DISCUSSION**

In general, future land use scenarios will be based on the Laboratory's long-term strategic planning document. The ER Project identifies industrial use for all current Laboratory operations within Laboratory boundaries and residential land use for those sites outside of Laboratory boundaries. In some cases, a different scenario (e.g., recreational) may be proposed. Each individual EC/VCA plan will identify the appropriate land use scenario.

The initial criteria used to evaluate candidate sites for either accelerated cleanup process include:

1. the potential remedy is obvious and can be readily applied;
2. the remedy will be a final resolution in order to prevent potential releases or migration of contaminants from the site in the future;
3. previous sampling data and/or archival data are available to adequately identify constituents of concern;
4. adequate treatment, storage, and disposal (TSD) capacity is available for all expected waste types; and
5. mixed wastes are generally not present or are minimal.

These initial evaluation criteria are common for identifying candidate sites for accelerated cleanup utilizing VCAs or ECs. However, as outlined in the following sections, the implementation of each respective approach is distinct.

#### Voluntary Corrective Actions

The VCA process is intended to address small-scale PRSs with relatively low-risk contamination problems where an obvious remedy may be implemented with a minimum of administrative requirements. Completion of a VCA for these sites outweighs the cost and schedule requirements to complete a risk-based cleanup with formal public involvement. These sites, typically cleaned-up as part of normal facility housekeeping or best management practices, may include stained soils at small waste or materials storage areas, construction debris accumulation piles, or one-time historical spills of materials such as paint, solvents or oils.

In addition to the five criteria previously outlined, the list of candidate sites will then be evaluated to determine if the following VCA criteria are met:

- cleanup levels are based on background concentrations, promulgated standards, or previously determined risk-based levels.
- estimated cost to complete the action is within budget (typically < \$100K); and
- estimated time to complete field activities is within a reasonable time frame (generally <30 days).

From this evaluation, the ER Project Office staff will review and update the preliminary list of candidate sites for VCA. These candidate sites may include, but are not limited to:

- PRSs that are generally not in the HSWA permit (e.g., areas of concern);
- rad-only sites; and
- sites with promulgated remediation criteria (e.g., polychlorinated biphenyl spills, asbestos disposal sites (TSCA), underground storage tanks (NMED UST Regulations).

and nonsystematic releases (e.g., spill cleanup criteria typically addressed by Spill Prevention Control and Countermeasures Plans).

VCA plans will be limited in size and consist of approximately one to two pages that follow the outline indicated on Attachment 1.

Once developed, these plans will be submitted through the ER Project Office to DOE for approval prior to initiating VCA field activities. When submitted to DOE for review, the VCA plans will also be forwarded to EPA Region 6 and NMED for informational purposes. Although formal public involvement should not be necessary, as cleanup for these sites is based on established levels and regulatory criteria, ER Project public meetings may provide a forum for discussion and public participation for pending VCAs. VCA plans approved by DOE will be implemented to the extent allowed by funding levels.

### Expedited Cleanups

The EC process is intended to address only solid waste management units (SWMUs) identified in the HSWA permit, however, the remedy is more complex than for a VCA. In general, these SWMUs meet the initial five evaluation criteria, yet likely exceed the specific VCA criteria. These units may require a detailed risk assessment to establish cleanup levels prior to remedy implementation, but the remedy selection is obvious and would not benefit from a full CMS. This EC process allows for regulatory and public review of remedy selection prior to implementation.

ER Project Office staff will review and update the preliminary list of candidate units (from SWMUs in the HSWA permit) for EC. These candidate units may include, but are not limited to:

- SWMUs where cleanup levels are based on a risk assessment, including, but not limited to those units with multiple contaminants of concern resulting in complex risk assessment issues from cumulative effects.
- SWMUs that are more complex requiring longer periods of time to remediate and more money, for example, those units with a history of continuous releases likely resulting in larger volumes of contaminated media.

EC plans will contain detailed information regarding site background and environmental setting, plan rationale, action tasks, and project management. The contents and format for an EC plan are provided in Attachment 2. In addition, an EC plan may be developed for several SWMUs where the cleanup approach is similar and the approach employs similar concepts. To address several SWMUs within a single EC plan, the following criteria must be analogous: SWMU types (i.e., firing sites, septic tanks, etc.), cleanup criteria (future land use, etc.), and remedial field operations and activities. When an EC plan addresses multiple units, a description of unit similarities as well as the specific details associated with each individual unit (unit number, size, contaminants of concern, etc.) should be outlined in addenda to the plan.

ECs will follow the process described in 40 CFR Part 270.42(c) for a Class III Permit Modification. Once an EC plan is developed, EC procedures require public involvement and regulator review, and approval of characterization and cleanup criteria prior to site remediation. It is important to note, that if for any reason, it appears the Permit Modification will not be completed in time for allocated funds to be spent, the ER Project will request a Temporary Authorization to proceed with the EC process. Upon receipt of

April 4, 1995

approval of temporary authorization or the permit modification from EPA, the approval letter will be attached to the EC Plan.

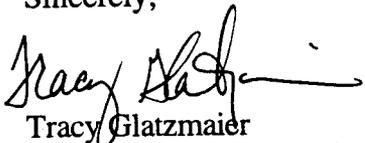
Facilitating VCA and EC Activities

The ER Project Office and Field Project Leaders will work with Waste Management to establish specific waste characterization criteria and ensure adequate TSD capacity exists for each waste type prior to generation. The ER Project Office will also group candidate sites for VCA and units for EC to ensure that uniform, consistent, and well documented decision processes are applied, with a minimal amount of associated paperwork. This approach allows characterization/cleanup processes to be streamlined, provides consistency when addressing similar or recurring problems, and results in economical use of limited resources.

To expedite the receipt of analytical results, wherever possible field screening and/or laboratories will be utilized for verification/confirmation samples with not less than 10 percent of the confirmatory samples submitted for fixed laboratory analyses. ER Project Quality Assurance/Quality Control and analytic documentation requirements will be followed. Appropriate site-specific documentation and plans will be prepared and implemented, however, formal ER Project readiness reviews will not be required for these accelerated cleanups. Additionally, when possible, VCAs and ECs will be implemented in accordance with existing Laboratory-wide documentation (e.g., National Environmental Policy Act).

**CONTACT PERSON:** Dave McInroy (505) 667-0819

Sincerely,

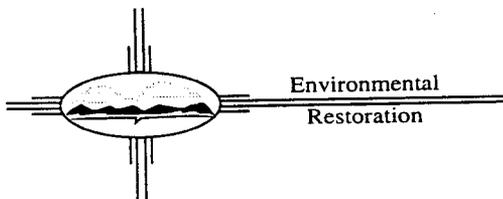
  
Tracy Glatzmaier  
Environmental Restoration

Sincerely,

  
Court Fesmire  
Los Alamos Area Office

TG/CF/bp

- Attachments:
- (1) Voluntary Corrective Action Plan Contents
  - (2) Expedited Cleanup Plan Contents
  - (3) DOE Approval and Review Form



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# ATTACHMENT 1

## VOLUNTARY CORRECTIVE ACTION PLAN CONTENTS

DOE APPROVAL AND REVIEW FORM

TABLE OF CONTENTS

- 1.0 INTRODUCTION
- 2.0 SITE TYPE AND DESCRIPTION
- 3.0 PROPOSED REMEDY; INCLUDING CLEAN UP LEVELS AND LAND USE ASSUMPTIONS
- 4.0 JUSTIFICATION/RATIONALE FOR THE ACTION
- 5.0 ESTIMATED WASTE VOLUMES BY TYPE
- 6.0 DESCRIPTION OF CONFIRMATORY/VERIFICATION SAMPLING
- 7.0 ESTIMATED TIME AND ASSOCIATED COST TO COMPLETE THE ACTION

ANNEXES

Waste Management Form  
Health and Safety Plan  
Quality Assurance Plan

## ATTACHMENT 2

### EXPEDITED CLEANUP PLAN CONTENTS

*we have are  
the exchanges  
between regulator  
& facilities - Decision  
making points?*

EPA APPROVAL LETTER

ACRONYMS

TABLE OF CONTENTS

- 1.0 INTRODUCTION
  - 1.1 Assumptions
  
- 2.0 SITE BACKGROUND AND ENVIRONMENTAL SETTING
  - 2.1 Detailed Description of SWMU
    - 2.1.1 Operational History
    - 2.1.2 Physical Setting
  - 2.2 Summary of Investigations →
    - 2.2.1 Investigations Prior to RFI →
    - 2.2.2 RCRA Facility Investigation
    - 2.2.3 Summary and Evaluation of Results
  - 2.3 Types and Volumes of Wastes Present
  - 2.4 Potential Impacts on Public Health and the Environment/Risk Assessment
    - 2.4.1 Potential Pathways
      - 2.4.1.1 PRS-In Place
      - 2.4.1.2 PRS-Remediation
    - 2.4.2 Future Land Use
    - 2.4.3 Cleanup Levels
  
- 3.0 EXPEDITED CLEANUP
  - 3.1 Overview and Rationale
  - 3.2 Permitting, Approval, and Notification Requirements
    - 3.2.1 Regulatory Notification/Permit Modifications
  - 3.3 Cleanup Activities
  - 3.4 Waste Management Issues
    - 3.4.1 Characterization of Materials for Disposal
    - 3.4.2 TSD Plans for Waste
  - 3.5 Verification Plan
  - 3.6 Site Restoration Plan
  - 3.7 Final Inspection
  - 3.8 Final Report
  
- 4.0 PROJECT MANAGEMENT
  - 4.1 Staff and Resource Requirements
  - 4.2 Detailed Schedule (including Gantt chart)
  - 4.3 Stakeholder Notifications
  
- 5.0 REFERENCES
  
- 6.0 ANNEXES
  - 6.1 Implementation SOPs
  - 6.2 Quality Assurance Plan
  - 6.3 Health and Safety Plan
  - 6.4 Waste Management Plan

- 6.5 Records Management Plan
- 6.6 Public Involvement plan

## **TABLES**

Anticipated Waste Volumes

## **FIGURES**

Location of the PRS  
Conceptual Exposure Model for the SWMU  
Schedule  
Verification Sample Locations

## **ATTACHMENT**

EPA Approval Letter (once plan is approved)

**ATTACHMENT 3  
FIELD WORK APPROVAL FORM**

This form must be completed prior to starting remediation field work in accordance with Voluntary Corrective Action Plans.

I, \_\_\_\_\_, DOE-LAAO, **Approve** the field work as proposed in the accompanying Voluntary Corrective Action Plan for Potential Release Site \_\_\_\_\_, TA-\_\_\_\_\_.

I, \_\_\_\_\_, DOE-LAAO, **DO NOT APPROVE** the field work as proposed in the accompanying voluntary correction plan for Potential Release Site \_\_\_\_\_, TA-\_\_\_\_\_.

The following reasons reflect the decision for disapproval:

Signed: \_\_\_\_\_

Date: \_\_\_\_\_