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Date: November 27, 1996
 Refer to: EM/ER:96-600

Ms. Marcy Leavitt
 Bureau Chief
 NMED-GWPRB
 P.O. Box 26110
 Santa Fe, NM 87502

Mr. Ed Kelley
 Acting Bureau Chief
 NMED-SWQB
 P.O. Box 26110
 Santa Fe, NM 87502

SUBJECT: MINUTES FOR MONTHLY MEETING WITH WATER QUALITY BUREAUS

Dear Ms. Leavitt and Mr. Kelley:

Enclosed please find a copy of the meeting minutes pertaining to the meeting held in Santa Fe on October 28, 1996. The meeting included staff members of the Ground Water Protection and Remediation Bureau, Surface Water Quality Bureau, Agreement in Principle staff, and members from Los Alamos National Laboratory's Environmental Restoration Project and Water Quality/ Hydrology groups. We appreciate the opportunity to have these meetings so that we might jointly work on technical and administrative issues pertaining to our programs.

Should you have any questions, please call Dave at (505) 667-0819 or Bonnie at (505) 665-7202.

Sincerely,

David McInroy, Compliance Manager
 LANL/ER Project

Sincerely,

Bonnie Koch, Compliance Manager
 DOE/LAO

Sincerely,

Alex Puglisi, Compliance Manager
 Water Quality/Hydrology



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Enclosure: October 28, 1996, Minutes for Monthly Meeting with HRMB

Cy (w/ enc.):

T. Glatzmaier, DDEES/ER, MS M992
D. Griswold, AL-ERD, MS A906
J. Jansen, EM/ER, MS M992
B. Koch, LAAO, MS A316
D. McInroy, EM/ER, MS M992
A. Puglisi, ESH-18, MS K497
S. Rae, ESH-18, MS K497
R. Sena, AL-ERD, MS A906
P. Shanley, ESH-20, MS K498
T. Taylor, LAAO, MS A316
T. Todd, LAAO, MS A316
S. Veenis, ESH-18, MS K497
RPF, MS M707

P. Bustomanta, NMED-GWQB
T. Davis, NMED-HRMB
H. Decker, NMED-AIP
R. Ford-Schmed, NMED-AIP
B. Hoditschek, NMED-SWQB
J. Rogers, NMED-GWQB
S. Yanicak, NMED-AIP, MS J993

Cy (w/o enc.):

T. Baca, EM, MS J591
EM/ER File, MS M992

Notes for Meeting with NMED SWQB/GWQB
Meeting Date: October 28, 1996, Rev. 1

A meeting was held in Santa Fe on October 28, 1996, regarding water quality and procedural issues. Representatives from the Surface and Ground Water Bureaus, Agreement in Principle, Department of Energy and University of California Environmental Restoration (ER) Programs, and the Water Quality and Hydrology group were in attendance. Several issues were discussed. The following minutes document those discussions.

1. Systematic Evaluation

Dave McInroy began with the following regarding the Administrative Procedure (AP):

- Distributed copies of Los Alamos National Laboratory AP-ER-4.5, Rev. 0;
- Discussed training given the Laboratory users in September 1996;
- Discussed need for the development of the AP; and
- Discussed need to keep revising, as the AP is implemented, and implementation procedures are improved.

Discussion:

Ralph Ford-Schmed mentioned prioritization and how the Laboratory would be identifying sites requiring best management practices (BMPs). Bonnie Koch mentioned "bad actors" such as mercury (Hg) and polychlorinated biphenyls (PCBs) and also the list of constituents in the WQCC regs. Glenn Saums indicated that such identification of bad actors should be enhanced when evaluating analytical by appropriate comparison to standards.

Harvey Decker said that the Hazardous and Radioactive Material Bureau (HRMB) had expressed to him some concerns regarding spill notifications. He gave the example of the "release" that was being addressed with the Corrective Action Report (CAR) for Potential Release Site (PRS) 18-003(d). Dave McInroy stated that Laboratory is trying to develop a single notification process that will satisfy the release notification process for Module II and Module VIII of the Laboratory's operating permit, as well as water quality regulations and the intent of the National Contingency Plan (NCP) for reportable quantities, if this can be worked out with various regulatory authorities.

Action Item:

Dave McInroy will prepare a list of BMPs that were Interim Actions (IAs) for 1996; also a list that are monitored and inspected; bring to each monthly meeting new BMPs for the month.

Dave McInroy presented a notebook of photographs of BMPs. New photos can be shown monthly. Glenn-Saums said that he has the concern of whether BMPs are being monitored for effectiveness; specifically, BMPs need to be inspected during critical events. Barbara Hoditschek may come up soon to inspect BMPs. Dave McInroy offered that BMPs for ER sites can be discussed in the Progress Tracking System (PTS) report.

In reference to the topic of notification, Bonnie Koch mentioned that currently, ER is using the vehicle of Resource Conservation and Recovery Act facility investigation (RFI) reporting, and other reports such as IA Reports, for notification until the Surface Water Quality Bureau (SWQB) requires otherwise. This is because PRSs are legacy spills as opposed to being spills in the operational sense.

In reference to the topic of verification monitoring of BMPs, Agreement-in-Principal (AIP) requested that they be notified so they can have the opportunity to split samples (e.g., those PRSs with automatic samplers or where grabs are taken and extra water is available for AIP).

Harvey Decker said that results of AIP monitoring on some of the southern canyons has recently shown mercury above detection limits. The canyons monitored were Potrillo, Fence, Ancho, and Water Canyon, plus unnamed tributaries.

Action Item:

Harvey Decker to give these results to group ESH-18. When questioned about the analytical technique for the samples, Ralph Ford-Schmed said the mercury was detected via an unapproved EPA method. Laboratory raised a question of whether the sampling should be repeated using an approved method. AIP replied that it is difficult to intercept a runoff event in which there is enough water to sample.

2. **Site Specific Standard** and 3a. **3-056(c)**

Alex Puglisi inquired as to when SWQB would be sending the Laboratory the monitoring level that they had calculated:

- Glenn Saums said he sent a memo to Benito Garcia. But Alex Puglisi replied that HRMB had not transmitted it to the Laboratory.

Action Item:

Barbara Hoditschek will call HRMB to see if they have received memo and planned any action.

Discussion:

Glenn Saums said 0.008 ug/L was calculated, but the memo specifies that SWQB will allow 1 ppb because of the MQL that is specified in 40 CFR 136.

Bonnie Koch mentions the coordination problem with TSCA on establishing the cleanup level for the site. Glenn Saums replied that SWQB is not really concerned with cleanup level if the monitoring level can be met.

Bonnie Koch then distributed the following:

- Sandia Canyon sampling data collected by Lynda Hartman of ER Field Unit 1 in June 1996.

Discussion:

The Laboratory explained that the data is problematic because the lab did not perform a true totals analysis; the lab filtered the sample and the results show the level of PCBs on the filter paper. Because of this, ER would like to resample to obtain more representative results. The Laboratory explained that the data show somewhat similar levels of PCBs at each of the three locations sampled (Culvert #1, #2, and #3) and they are not higher below 3-056(c) (e.g., Culvert #1). The data may be showing a general level for Technical Area (TA) 3 runoff.

Ralph Ford-Schmed recommended sampling below the wetlands. Glenn Saums says the data indicates some need for activity. Ralph Ford-Schmed recommended controls to stop migration of PCBs further downstream. Alex Puglisi recommended a separate meeting on the Sandia Canyon tributary.

3b. Hillside 138

Bonnie Koch stated recent events:

- The cleanup was completed in September 1996. After cleanup, a high volume runoff event in September allowed monitoring at the locations specified in the IA Plan. Steve Venis reported the results which showed all non-detects.

Discussion:

Glenn Saums mentioned his concern that mercury was removed only from the lower bench. Bonnie Koch explained that a voluntary corrective action (VCA) report is currently being written.

3c. DP Tank Farm

Bonnie Koch asked for a status:

- Has SWQB reviewed the monitoring plan in the VCA Report? Glenn Saums said that Barbara Hoditschek will be taking a look at this report in the near future.

Discussion:

A history of the need for the review was provided for Barbara Hoditschek. HRMB sent the Laboratory a Notice of Deficiency (NOD) indicating they could not complete a review of the RFI report until a closure letter was received from the Underground Storage Tank (UST) Bureau. The UST Bureau could not provide a closure letter until the SWQB had told them surface water concerns were resolved. SWQB told the Laboratory the surface water concerns could be closed out if the VCA Report presents an adequate monitoring plan. The approval process must therefore begin with SWQB's review of the monitoring plan in the VCA Report. Then UST will get what is needed and this can be passed on to HRMB.

3d. TA-32 BMPs

Bonnie Koch gave a status:

- Barbara Hoditschek was given photographs of the site and other BMPs. Dave McInroy said the intent of the photo book was to update it as interim actions and BMPs were installed.
- Because Glenn Saums also recommended hot spot removal, cost estimates for the effort had been performed.

3e. TA-18

A meeting held on Thursday, October 24, 1996. Discussion and decisions were made at that meeting and were briefly explained by Dave McInroy. These decisions were relevant to a CAR for PRS 18-003(d). Alex Puglisi, who arranged the October 24, 1996 meeting, gave further details on the agreements reached with New Mexico Environment Department (NMED) regarding the TA-18 CAR submitted on June 25, 1996. These were:

- The CAR will be revised to incorporate the changes agreed to at the October 24, 1996 meeting.
- The Laboratory will install two additional wells to investigate the source of the EDC at TA-18 and provide more information on the hydrological gradient at the site.
- MW-13 will be placed immediately adjacent to the drain field. MW-12 will be moved approximately 25 feet further east.

- All analyses proposed in the CAR will be implemented. In addition, ground water samples will be analyzed for chlorides. The monitoring will be conducted quarterly for eight consecutive quarters. However, if the first two quarters do not indicate problems with certain constituents, the sampling regiment can be changed, all or in part, with the approval of NMED.
- After well completion, the elevation of the top of each well casing will be determined by survey. Depth to water and water level elevations will be determined before each sampling event. This information will be provided to the NMED.
- The screened well interval will begin at a five foot depth and extend to base of the aquifer. This will allow for seasonal variations in the depth to water and provide at least one foot of screen above previously recorded water levels.

3f. **TA-54 RFI Report**

Dave McInroy discussed the sequence of delivery of the RFI reports, which address water quality associated with TA-54. There will be three reports addressing water quality issues. They deal with soil, air, and existing surface water flow and contamination data. He also noted the AIP letter asking for storm water data so they could complete a review of the RFI Report for the Sediment Channels and he explained the following:

- The TA-54 RFI reporting was broken into four areas by media: surface sediments, channel sediments, surface water and air.
- The next TA-54 RFI Report scheduled for regulatory delivery in February 1997 is the surface water report. It will incorporate the storm water data as part of the analysis.

Discussion:

Ralph Ford-Schmed said the review of the Sediment Channels report could wait until the next report is available in February 1997. Bonnie Koch let Barbara Hoditschek know that the report was an issue because NMED-HRMB had given the Laboratory an NOD on the TA-54 Channel Sediments report, the substance of the NOD being that HRMB cannot give an approval until SWQB has indicated there are no surface water issues.

3g. **Tensite Canyon Hummock Removal**

Dave McInroy gave a status on the removal which was an interim action.

Discussion:

Ralph Ford-Schmed asked if the unit was close to Material Disposal Area (MDA) C. Dave McInroy explained that the units are not contiguous or adjacent.

4. **Surface Water Cleanup Requirements**

This topic was deferred to a later meeting date due to time constraints.

5. **Watershed Management**

Bonnie Koch gave the following status on the development of the project:

- The Laboratory has completed the selection of a project leader and co-project leader.
- A draft charter has yet to be finalized.
- The project leaders are currently looking towards beginning a data quality objective (DQO) process as the first step in getting the process underway.

Discussion:

Harvey Decker expressed a concern that the process had been discontinued for some time. Glenn Saums requested that the past AIP efforts in the DQO process be utilized if possible.

6. **Status of NOIs Submitted to SWQB and GWQB**

During the meeting, this topic was removed from the agenda because the response on these NOIs was received prior to the meeting.

7a. **Status of Water Quality Application for MDA P**

Alex Puglisi asked about the status of this application because the Laboratory still has not received a response to the MDA P Water Quality application submitted in June. Several inquiries to NMED have been made by the Laboratory regarding this application and ESH-18 has been told that the application was approved and written notification would be sent to the Laboratory. The Laboratory has yet to receive any notice. Glenn Saums said he would speak to the Non-point Source Section to determine the status of this application. He would get back to the Laboratory as soon as he could.

Harvey Decker raised a discussion on the new road at the west end of MDA P. NMED recommended that water bars be constructed down the middle of the road and a catchment basin at the bottom. Dave McInroy took the **action item** to implement this recommendation.

7b. **Status of Water Quality Application for Sandia Canyon Crossing**

Glenn Saums gave the following status:

- He cannot say to proceed with the work but the approval letter should be signed out this week.

8. **Language for 1-203 Notification**

This topic is deferred to a subsequent monthly meeting.