

JK



University of California
Environmental Restoration Project, MS M992
Los Alamos, New Mexico 87545
505-667-0808/FAX 505-665-4747



U. S. Department of Energy
Los Alamos Area Office, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
505-667-7203/FAX 505-665-4504

Date: December 20, 1996
Refer to: EM/ER:96-629

Mr. Benito Garcia
NMED-HRMB
P.O. Box 26110
Santa Fe, NM 87502

SUBJECT: MINUTES FOR MONTHLY MEETING WITH HRMB

Dear Mr. Garcia:

Enclosed please find a copy of the minutes pertaining to the Environmental Restoration (ER) portion of the meeting held in Santa Fe on November 14, 1996, with members of your staff, Oversight Bureau staff, and personnel from Los Alamos National Laboratory's ER Project. The minutes have been reviewed by your staff and their comments have been incorporated.

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/LAAO

DM/BK/ss

Enclosure: November, 14 1996, Minutes for Monthly Meeting with HRMB

FILE LANL HSWA GEN/misc/N

TR



Cy (w/ enc.):

J. Ellvinger, ESH-19, MS K490
R. Ferenbaugh, EES-15, MS J495
P. Shanley, ESH-19, MS K498
T. Glatzmaier, DDEES/ER, MS M992
D. Griswold, AL-ERD, MS A906
W. Hansen, EES-15, MS J495
J. Jansen, EM/ER, MS M992
B. Koch, LAAO, MS A316
D. McInroy, EM/ER, MS M992
O. Myers, EES-15, MS J495
J. Plum, LAAO, MS A316
T. Taylor, LAAO, MS A316
T. Todd, LAAO, MS A316
RPF, MS M707

M. Chacon, NMED-HRMB
T. Davis, NMED-HRMB
R. Dinwiddie, NMED-HRMB
R. Ford-Schmed, NMED-OB
K. Hill, NMED-HRMB
S. Hoines, NMED-HRMB
J. Kieling, NMED-HRMB
R. Mayer, EPA
T. Michael, NMED-OB
J. Rogers, NMED-GWQB
S. Zappe, NMED-HRMB

Cy (w/o enc.):

R. Sena, AL-ERD, MS A906
T. Baca, EM, MS J591
EM/ER File, MS M992

**New Mexico Environment Department (NMED) and
Los Alamos National Laboratory (LANL) Joint Permitting and
Environmental Restoration (ER) Project Meeting Minutes**

November 14, 1996

Attendees:

NMED: Teri Davis, Susan Hoines, Steve Zappe, Michael Chacon
DOE: Jody Plum, Bonnie Koch
UC: Dave McInroy, Pat Shanley (ATK), Wayne Hansen*, Orrin Myers*,
Roger Ferenbaugh*, Garry Allen*, Roy Michelotti*, John McCann
(Neptune)
DOE OB: Ralph Ford-Scmid, Martin Kieling, Tim Michaels
EPA: Kim Hill
(* Present during selected agenda items)

Agenda Item 1a. Ecological (Eco) Risk

The topic was introduced as an update on eco risk assessment process. LANL requested NMED to indicate if they think the approach that will be presented is appropriate.

Orrin Myers and Roger Ferenbaugh presented an update on the Eco Risk Approach. Handouts to update the "Eco Notebook" were provided. Briefly, Orrin Myers explained how and why a "Swiss army-knife" approach to eco exposure units was being adopted. The approach now utilizes divisions of vegetation zones, canyons, and mesas.

Comments on the approach were:

- What about air dispersion of contaminants?
- Contiguous habitat may not be addressed.
- Contaminant concentration may be diluted (e.g., if mesa is contaminated but adjacent canyon slope is not); why these divisions?

These comments were addressed by Orrin Myers and Roger Ferenbaugh indicating that all divisions are "trade-offs." The approach will be two-pronged. First, a potential release site (PRS) itself and immediate habitat are considered. Second, the migration from the PRS to the ecological unit.

A brief discussion of whether total maximum daily loads could be introduced into the approach.

The next eco topic will be food webs and critical ecological receptors.

Agenda Item 1b. Rad Strawman

Wayne Hansen presented information on how radiological contaminants should and/or could be considered in an eco risk assessment. Wayne Hansen indicated that this is a wide open field with little scientific literature available. In general, a conservative human health risk assessment and/or screening would be adequate for determining if there was a radiation risk to biota. If this is not done, biota should be specifically considered.

Wayne Hansen gave an example of a plutonium exposure scenario of an elk as a check on the statement "... if humans are protected so are biota." The soil concentration that would result in 0.1 rad/d to the elk skeleton is about 100 times the soil concentration that would deliver a limiting dose to man.

*Janice look
should look
I think*

Issues Wayne Hansen brought up included the following: Is it adequate to look at monthly standards of exposure? The standards allow for yearly exposure, but many biota do not live that long. The Oak Ridge Study departs from the National Committee on Radiation Protection recommendation that suggests that the maximum exposed individual be considered. Wayne Hansen suggests that, like the Oak Ridge study, a representative individual of the population be considered. Should modifying factors be introduced for biota?

Action Item: NMED and Department of Energy (DOE) OB will provide comments on the Rad Strawman.

*Janice
should
review*

Action Item: LANL needs to provide example calculations to make the model "transparent" so that assumptions can be seen and evaluated.

Action Item: Teri Davis suggested that NMED and LANL should determine if a working group should be established to set criteria for the assumptions used in ecological risk assessment.

Agenda Item 2. Project Tracking System (PTS) Report

Bonnie Koch requested comments from NMED on the PTS format and expressed DOE's desire that it be used as the Module VIII-required monthly report. NMED has not been able to thoroughly review it.

Action Item: Bonnie Koch and Kim Hill will discuss the report and Kim will disseminate information to NMED.

Agenda Item 3. PRS 3-056(c)

Gary Allen and Bonnie Koch presented information on the history of the PRS. A handout documenting the history was provided, as well as information on

additional sampling of the Technical Area 3 areas. Two major points were addressed: the lack of clarity on which agency has final regulatory authority on the cleanup level; and LANL's desire to treat the polychlorinated biphenyl contamination present in storm water upgradient and downgradient as a separate PRS.

LANL explained that the voluntary corrective action report specifies a 10 ppm cleanup level and why LANL believes it is protective. The plan includes capping the PRS and conducting eight quarters of surface water monitoring. Garry Allen provided Susan Hoines with a complete document file on this PRS to facilitate her review. Kim Hill suggested the issue be elevated to the next level within the Environmental Protection Agency (EPA) due to stagnation on the cleanup level issue.

No action items were assigned for this agenda topic.

Agenda Item 4. PRS 0-016, Guaje Pines Small Arms Firing Range

LANL provided a brief history on the activities of the site and the current status. The desire of the US Forest Service to complete a land transfer for the site location was included. The current shaker plant process cannot resume until the soil completely dries out, which may not occur until March 1997. DOE does not want to wait, due the pending land transfer, and is exploring options for managing the soil. A handout with the options of what could be done with the soil was provided along with a diagram illustrating management of the soil. The issue that some of the soil was once a hazardous waste that was diluted during the aggregation of soil for processing complicates the next step. Kim Hill asked what action is needed from NMED

Action Item: LANL will prepare a letter asking NMED to concur with the option that the soil be moved within LANL boundaries and the shaker plant activity resume the recycling effort when it is dry.

Can this be authorized under LDR Regs?

Agenda Item 5. PRS 16-021(c)/CMS

Roy Michelotti presented the actions conducted at the PRS to date and the planned activities. A handout outlining these activities was provided, and it was used as a guide during the walk-through of investigations that have been conducted and planned activities. The best management practices in place were explained. Roy requested early involvement in the corrective measures study (CMS) process for this site due to its complex nature and many potential regulatory issues. NMED indicated that this is the first CMS to be performed in the state.

The fact that a CMS has been required for this PRS without the nature and extent of contamination being bounded presents uncertainty on how to address

the Phase II Resource Conservation and Recovery Act facility investigation sampling plan. LANL requested that the CMS due date be identified as sometime after the RFI Phase II data is assessed (9/97).

Action Item: NMED will get back with LANL to determine the CMS due date.

Agenda Item 6. Recent Letter

LANL indicated that the Surface Water Bureau Corrective Action Report has been submitted to NMED. LANL presented the history of reporting releases from solid waste management units (SWMUs) as required in Module VIII under EPA's authority. Few releases were reported unless they were actually from a present day occurrence, not when historical contamination was noted or confirmed. A general discussion on what is a release and when should it be reported ensued.

Action Item: LANL will draft proposed criteria for when a release from a SWMU must be reported to NMED for comment.

November 14, 1996

<u>Name</u>	<u>Organization</u>	<u>Telephone</u>
Bonnicksch	DOE-LAAB	665-7202
Jack Ellinger	ESH-19/LANL	667-0633
Orrin Myers	EES-15/LANL	665-3742
Roger Ferenbaugh	EB-15/LANL	667-0811
H.T. Plum	DOE/LAAB	665-5042
Teri Davis	NMED/HRMB	827-1558
KIM T. HILL	"	"
Martyn Kiebing	NMED/DOE OB	827-1536
Tim Michael	NMED/DOE OB	827-1536
Susan Hoines	NMED/HRMB	827-1558
?Alph Ford-Schmid	NMED/DOE OB	827-1536
Steve Zappe	NMED/HRMB	827-1561
Wayne R Hansen	EES-15, LANL	667-3331
Michael Charoi	NMED/HRMB	827-1561
Pat Shenley	LANL/ESH-19/ATK	667-0663
DAVE McINROY	LANL/ER	667 0819

Agenda
LANL ER/WM MONTHLY MEETING WITH NMED HRMB
ER SEGMENT
November 14, 1996

1. Ecorisk Process - Dave McInroy, Orin Meyers, Bob Simeone (9:00-10:30)
 - 1a. Ecological Exposure Units (EEUs)
Presentation on approach and development of EEUs.

 - 1b. Rad Strawman
Discussion of NMED's comments on this document.

2. PTS Report Format - Bonnie Koch (10:45)
Discussion of NMED comments of on PTS Format and PTS Report as the regular monthly reporting document.

3. 3-056(c) - Bonnie Koch, Garry Allen (10:45-11:00)
Discussion of VCA history at site, resolution of cleanup level, and site's association with investigation planned in Sandia Canyon Tributary.

4. 0-016 VCA - Dave McInroy, Bonnie Koch, Garry Allen (11:00-11:15)
Discussion of remaining 1200 cubic yards that could not be completely processed via Shaker Plant during FY96 and pending land transfer by USFS.

5. 260-Outfall - Dave McInroy, Roy Michelotti (11:15-11:45)
Briefing and discussion on plans for the CMS.

6. TA-18 Corrective Actions and Release Notification - Pat Shanley (11:45-12:00)
Discussion of NMED letter, October 29, 1996, on release notification for this site.