Environmental Restoration
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: February 13, 1997
Refer to: EM/ER:97-034

Ms. Marcy Leavitt
Bureau Chief
NMED-GWQB
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 January 23, 1997. The meeting included staff members of the Ground Water Quality Bureau (GWQB), Surface Water Quality Bureau (SWQB), Hazardous and Radioactive Materials Bureau (HRMB), Agreement in Principle staff, and members from Los Alamos National Laboratory's Environmental Restoration Project and Water Quality/Hydrology groups. We would like to thank SWQB, GWQB, and HRMB for providing review comments on the meeting notes.

Should you have any questions, please contact 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

Sincerely,

Alex Puglisi, Compliance Manager
Water Quality/Hydrology

DM/BK/rfr

12957

Enclosure: January 23, 1997, Minutes for Monthly Meeting with SWQB and GWQB

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
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. Bustamante, 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
R. Sena, AL-ERD, MS A906
EM/ER File, MS M992

BCY (w/ enc.):
G. Allen, CST-18, MS E525
S. Bolivar, EES-13, MS H865
M. Gilgosch, LAAO, MS A316
G. Gould, ESA-EPE, MS G787
D. Krier, EES-1, MS D462
R. Michelotti, CST-18, MS E525
J. Mose, LAAO, MS A316
A. Pratt, EES-13, MS J521
M. Salazar, EM/ER, MS M769
B. Simeone, LAAO, MS A316
E. Trollinger, LAAO, MS A316

Meeting Minutes
ER Portion Monthly Meeting with NMED SWQB/GWQB
January 23, 1997

Agenda Item 1b - Document of Understanding (DOU):
Barbara Hoditschek of NMED SWQB reported on the progress of the DOU committee for surface water concerns. The first meeting is tentatively planned for February. Deborah Griswold of DOE-AL is sending a letter to the various agencies to solicit new members. Old issues as well as new issues will be addressed. She has performed some research to aid in developing the SWQB Annex. This research includes "promises" made by the ER Program. The "promises" are contained in teleconference notes made by Ted Taylor, DOE-LAAO, 6/7/96 (see attached). She is also looking at the "Phase I" documentation material and she will be sending comments on the deliverable to the program. The comments will include information on what SWQB wants on releases and other surface water issues. The "promises" and the "Phase I comments" will be used to take SWQB recommendation to the DOU team which will vote as a whole on what to develop for the annex.

Discussion:
Dave McInroy of LANL said he is concerned about the team alone voting on what is to be included for the annex. The monthly meetings have been used to develop the items that SWQB in conjunction with GWQB and HRMB require for ER to respond to water quality concerns; what if the DOU team members vote against these? Hoditschek said she was also concerned about this based on comments and questions she has heard concerning the value of the DOU annexes. But, Hoditschek said the Phase I/Taylor items should help in this area. She also said that when the comments on the Phase I deliverable are available, the ER Program will see that SWQB doesn't necessarily want ER to perform "extra" work. She believes that many of the problems can be resolved with FIMAD. Hoditschek said that for the RFI Reports, the focus should be on the 686 sites identified near, on, or in a water course. And, there is a problem here, because SWQB has to wait so long for the RFI Reports to be generated; SWQB may not want to wait so long. Here, Koch mentioned that the AP 4.5 forms are internally generated to cover the 686 sites, even ahead of the RFI Reports, and trigger surface water controls if necessary. Hoditschek said that there is also a problem with the fact that many RFI Reports have gone to HRMB without surface water concerns addressed; separate documents may be required for these documents. Kim Hill, HRMB, agreed that this was a problem. Koch asked the question of (to Kim Hill) whether this meant that HRMB requires water quality concerns to now be addressed before accepting an NFA proposal. Hill said that HRMB will not grant an NFA until the SWQB, GWQB, and UST concerns are satisfied with actions at a PRS. Glenn Saums of SWQB said that Ed Kelley supports this NFA view, that the bureaus must work together on this. Hill said the RFI Report must have a cover letter with flags indicating whether there are water quality concerns and a separate section of the RFI Report must be available. Hoditschek said that currently it is a matter of hunting through these documents for the information. Koch said that the ER Program action 12/5/97 for RFI

Report straw man, water quality concerns, was still outstanding. Koch also asked if HRMB could provide a letter to the ER Program explaining that NFAs cannot be approved until all environmental concerns including surface water, ground water quality and UST concerns are addressed. Hill said she would take this to the working group meeting between the bureaus, which is scheduled for 1/29/97. McInroy raised the issue that the LANL ER Project may question why this must be done at LANL if Sandia is not operating according to the same requirement. Hoditschek and Hill said that Sandia will also be subject to the same requirements and the bureaus will address this issue at their internal meeting. Saums said SWQB has focused on LANL ahead of Sandia because of facility size and other factors, but that Sandia will also have to address water quality for NFA. McInroy said that Julianne Levings and John Arthur of DOE-AL should know that LANL and Sandia both have the same requirement. Koch said she would make sure to send minutes to Griswold and also brief her. Koch is to take the action of asking Griswold if a Sandia representative can come to meetings covering policy. Ralph Ford-Schmidt has the action item to start compiling issues that will affect both facilities.

Action Items from Agenda 1b:

1. Hoditschek provided the Taylor "promises" to Koch (same day as meeting).
2. Koch will make sure that Griswold is on distribution for these minutes; she will call to brief her on the Sandia consistency question and also to ask if a Sandia representative can come to a policy meeting sometime.
3. ER Program to give a straw man of RFI Report section for water quality (unclosed action item from 12/5/96).
4. Hill take to meeting 1/29/97 requested letter on HRMB NFA policy for surface water concerns; she will try to prepare the letter after this meeting..
5. Ralph Ford-Schmidt will compile issues affecting both LANL and Sandia (no deadline set).
6. The ER Program will be prepared to discuss the Taylor "promises" at the next meeting. (SEE ATTACHED #1)

Agenda Item 2- Release Notification for ER Sites:

Hill and Hoditschek said that the bureaus developed a form for HSWA and WQCC reporting. Mike Alexander has a draft for review. It is basically the LANL form that ESH-18 uses with some additional information requested. A letter will be sent to ER on 1/29/97 which explains the criteria and process for reporting of legacy spills. The three bureaus will discuss transmitting the same to Sandia. Pat Shanley, LANL, asked if another word could be substituted for "legacy" because RCRA uses the word in a specific sense for storage. The word "historical" was suggested for substitution purposes. Puglisi asked if the form applied to both Modules II and VIII of the LANL RCRA Permit. Hill said that Module II was also considered when preparing this form and would be covered in the letter/form that HRMB will send. Hill said at first it will seem like more is required, but this should evolve into to seeing that duplication of effort is actually eliminated.

Action Items from Agenda 2:

1. HRMB will finish the letter to LANL on release notification, 1/29/97.

Agenda Item 1a - TA-15 Connector Road:

Mike Alexander, LANL, provided a sampling plan draft to respond to NMED SWQB questions on the 15 day Corrective Action Plan. He requested that SWQB provide comments on the draft before the final is due on January 13. Hoditschek said she had the concern for whether the composites for the site where the fill was taken will be representative. Saums said the sampling plan must provide the rationale for why the composites are representative. Hoditschek asked what LANL will do if sampling at fill sources shows contamination. Alexander said the watercourse may then require sampling. Saums asked if this will cause a need for an extension to the deadline. Alexander said that currently indications are that the deadline can be met. Hoditschek asked about material for the 7-day for other releases: TA-53-63; TA-15-1032. Hoditschek said a lot of the release notifications turned in by ESH-18 gave the 7-day written and 15-day corrective action report at the same time. Puglisi replied that this was often done when no cleanup or minimal action was performed (i.e., a potable water release, sanitary wastewater had already infiltrated into ground). Hoditschek and Hill said that the facility should not decide if no further action is required on the 7-day; this will be covered in the letter coming 1/29/97 on release notification. Hoditschek said this raises the question of Fenton Hill; that release may have crossed SWMUs (mentioned as probably 57-001(e)) creating the potential situation of a second release. ER report on this next week at the meeting schedule 1/30/97. Harvey Decker, AIP, said they had heard mercury was a problem for the Fenton Hill spill. Ralph Ford-Schmidt said the Fenton Hill spill didn't compare the problem to WQCC wildlife standards. Shanley said she did call Terri Davis, HRMB, about the Fenton Hill spill; it was not thought at this time that the spill crossed any PRSs. The SWMU is thought to already be in an RFI Report as an NFA.

Action Items from Agenda 1a:

1. SWQB to provide comments to Alexander before the draft is finalized, 2/13/97.
2. LANL to revise the sampling plan to state why composites are representative.
3. ER will report 1/30/97 on whether the Fenton Hill spill crossed a SWMU.

Agenda Item 3, AP-4.5:

Steve Veenis explained that meeting individually with FPLs to explain the use of AP-4.5 had resulted in the completion of approximately 100 of the forms attached to the procedure. He said that ESH-18 portions must be completed before the forms can be inspected by NMED. Veenis discussed the issue of prioritization within the ER Program. Currently the direction is to have FPLs complete forms for sites which have not been recommended for NFA which are also in the group of 686 sites identified by the Phase I deliverable to be in or adjacent to watercourses.

Discussion: Hoditschek asked if Ford-Schmidt's comments on the forms had been incorporated. Veenis said the only comment outstanding is incorporation of watershed identifier; this can be easily added. Hoditschek also asked if the data on the forms had

been generated from a FIMAD search. McInroy said that FIMAD can be used for a search via triggers and criteria for the query; for instance 3x SALs. He said that it is still the situation that one can go from contaminant to SWMU but not from SWMU to contaminant. Ford-Schmidt asks about data that has not yet been entered. McInroy said that FIMAD is scrubbed for identifiers for 3 categories of data: one of them is called the ecofile which is QA'd; this is the usable subset for searches. He said that it is possible, later, that alarms for triggers can be set up in the weak tables. Ecofile is being used on the prioritization problem for the 686 sites. Hoditschek asked about the qualifiers for the current triggers. McInroy said that it is currently set at 3x SALs based on discussion with the bureaus from the 12/5/97 meeting. Hill said that the triggers that the bureaus want for the notification will be listed in the letter on notification to be completed 1/29/97. Ford-Schmidt raised the issue that the SAL for some contaminants such as mercury are too high for a trigger. McInroy replied that PCBs and Hg will have a contaminant specific trigger. Solubility coefficient can be used; those that partially degrade can also be equipped for contaminant specific triggers. McInroy has the action item to prepare a list of the triggers currently being used for next month's meeting. Ford-Schmidt has the action item to provide LANL with the currently compiled AIP list of contaminants that may require specific triggers. Veenis said that the ER Program is also in the process of developing SALs for water media, in particular to compounds without a WQCC standard; these can be used in the FIMAD searches. Saums said he is still worried that input is not retrievable. McInroy said that data currently being entered has a PRS label; data entered from past years may still not carry the PRS number attached to it; the idea is to be able to concentrate on the 686 sites. Hoditschek requested that McInroy provide an updated list of the 686 sites for the next meeting; McInroy has this action item. Ford-Schmidt would also like a copy; he also requests a copy of AP-4.5 forms after ESH-18 has completed their portion. Ford-Schmidt is using it for the NMED data base which will is being compiled to keep track of sites requiring field visits. McInroy raises the issue of NMED using the forms/data base as a hammer. Hoditschek says that the NMED is currently using the information to provide feedback for LANL. Saums mentions that the AIP has been instrumental in providing feedback. McInroy mentions that the forms should not be "graded" by NMED. Alexander mentions that ESH-18 also uses the forms to identify sites requiring field inspections. McInroy said that the forms should be provided to NMED in a cooperative effort; Ford-Schmidt says that AIP would like to have the forms available for site inspections so that the use of the AP can be verified in the field. The ER Regulatory Forum may be used to train Field Unit personnel on the continued use of the AP; buy-in is needed at the Field Unit level on the use of the AP. Saums raises a concern for "buy-in;" are ER Program personnel not responding according to the agreements and the procedures worked out at these monthly meetings? If not, then he has the concern that the time for these meetings may be a wasted effort? Koch and McInroy explain that the program is large and that making changes can take time and sometimes causes shock waves. Ford-Schmidt asked the following question regarding the AP-4.5 forms: are the highest concentrations or a range of contaminant concentrations reported. McInroy said that data from the RFI Reports is currently attached and so a range is available. Saums said that number of samples taken should be available. Veenis asked the question of connection between the AP-4.5

forms and 1203 reporting. Ford-Schmidt and Hill said the letter coming from the bureaus will address this; the forms may be used to respond to the letter. Ford-Schmidt also said that the AP-4.5 forms would be useful reference information for LANL when generating written 15-day corrective action reports regarding 1203 release notifications.

Action Items from Agenda 3:

1. McInroy has the action item to prepare a list of the triggers currently being used for next month's meeting.
2. Ford-Schmidt has the action item to provide LANL with the currently compiled AIP list of contaminants that may require specific triggers.
3. Hoditschek requests that McInroy provide an updated list of the 686 sites for the next meeting; McInroy has this action item. Ford-Schmidt would also like a copy.
4. Steve Veenis has the action item to provide Hoditschek with a list of the 100 PRSs for which the AP-4.5 forms have been completed.

Next Meeting:
February 20, 1997, 8:30 @ Runnels Building in Santa Fe.