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Date: July 3, 1997  
Refer to: EM/ER:97-176



ASWA LANL 7/11/97

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 April 15, 1997, with members of your staff and personnel from Los Alamos National Laboratory's ER Project. The minutes have been reviewed by your staff.

Should you have any questions, please call Dave at (505) 667-0819 or Joe at (505) 667-5808.

Sincerely,

David McInroy, Compliance Manager  
LANL/ER Project

Sincerely,

Joe Mose, Compliance Manager  
DOE/LAO

DM/JM/ss

Enclosure: April 15, 1997, Monthly Meeting Minutes with HRMB

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Cy (w/ enc.):

W. Cox, SNL  
M. Ebinger, EES-15, MS J495  
J. Ellvinger, ESH-19, MS K490  
R. Ferenbaugh, EES-15, MS J495  
T. Glatzmaier, DDEES/ER, MS M992  
D. Griswold, AL-ERD, MS A906  
D. Hickmott, EES-1, MS D462  
J. Jansen, EM/ER, MS M992  
J. Plum, LAAO, MS A316  
P. Shanley, ESH-19, MS K498  
T. Taylor, LAAO, MS A316  
T. Todd, LAAO, MS A316  
EM/ER File, MS M992  
RPF, MS M707

T. Davis, NMED-HRMB  
S. Dinwiddie, NMED-HRMB  
K. Hill, NMED-HRMB  
J. Kieling, NMED-OB  
J. Parker, NMED-OB  
B. Toth, NMED-HRMB  
J. Young, NMED-HRMB  
D. Wilburn, NMED-HRMB

Cy (w/o enc.):

T. Baca, EM, MS J591  
G. Rael, DOE-AL, MS A906  
J. Vozella, LAAO, MS A316  
EM/ER File, MS M992

New Mexico Environment Department (NMED) and Los Alamos National  
Laboratory (LANL) Environmental Restoration (ER) Project  
Meeting Minutes  
April 15, 1997

Attendees:

NMED: Teri Davis, John Kieling, Stu Dinwiddie\*, John Young, Kim Hill (EPA);  
Barbara Toth\*, Diane Wilburn\*

LANL: Joe Mose (DOE), David McInroy (UC), Pat Shanley (UC/ATK), Don  
Hickmott (UC)\*

\* Present only during some meeting segments

**Agenda Item 1: Presentation From Field Unit 3**

Don Hickmott provided a handout for his presentation describing the current status and future work planned at PRS 16-021c (TA-16, Building 260 Outfall). D. Hickmott indicated that the additional work that is being conducted at this investigation area is an enhancement of the existing SAP. He stated that the next three boreholes would be based on recent data from geophysical investigations as well as existing information. NMED indicated that they might be inclined to wait until all geophysical data is available prior to finalizing the selection of the borehole sites.

The need to address the changes to the current sampling and analysis plan were discussed. LANL expressed an interest in providing frequent oral updates to NMED on sampling decisions and how the field unit team was determining the next investigation step. NMED indicated that LANL may need to formally submit something to them to document the changes occurring to the investigation approach.

D. Hickmott indicated that a Notice of Intent for discharge of water at the outfall to support bioremediation will be submitted soon to the Surface Water Quality Bureau by ESH-18. In situ bioremediation was not proceeding at the pace FU 3 had anticipated due to the inability of the LANL principal investigator to commit time to the project.

D. Hickmott distributed EPA papers on HE field analytical methods and HE sampling.

**Action Item:** HRMB indicated that they will contact FU 3 Project Leader, Roy Michelotti, if they determine a SAP or SAP addendum is required.

Later in the meeting, this item was revisited and NMED indicated they believed a new SAP was necessary according to the new accelerated cleanup process. Dave McInroy will review the language in the Accelerated Corrective Action Process and contact D. Hickmott to determine if a new SAP or modifications are necessary.

## **Agenda Item 2: FY98 Priority Activities**

LANL provided a draft list of the ER 1998 priority activities. The information is provided to NMED to facilitate their determination for NMED 1998 work priorities. LANL emphasized that the identified activities are draft and LANL is in the early stage of baseline development.

LANL explained that the 1998 Baseline must be submitted to DOE by July 1, 1997. The disconnect between LANL's submittals to NMED and NMED's 1997 grant commitments with EPA was briefly addressed. The problem remains that LANL puts a baseline of activities for the next year's budget together after the date NMED needs to select grant commitments. LANL reiterated that the baseline is often not finalized for many months after it is submitted, which may result in work scope changes.

NMED expressed appreciation for receiving the proposed work information. LANL indicated that they will strive to provide information on the proposed 1998 Accelerated Actions to facilitate selection of NMED's 1998 priority work. NMED and LANL will strive to ensure that grant commitments are not selected for low priority work that could be delayed in the FY98 baseline.

## **Agenda Item 6: Clarification of Recently Used Terminology**

This agenda item was moved up in the meeting sequence to allow for S. Dinwiddie's participation.

LANL requested clarification on several terms used in letters received from HRMB in the recent past. The first issue was the use of the omnibus provision. P. Shanley indicated that LANL believed that a permit condition needs to be written to incorporate any new requirements. HRMB indicated that the requirement to follow other regulations is present in the permit. The second issue addressed was the use of the term "RCRA-regulated" in relation to a SWMU. HRMB and LANL agreed that the term is specific to land-based units that generally require ground water monitoring and that not all SWMUs are RCRA-regulated units. The final issue discussed was the requirement in a recent NOD that RFI Reports be stand-alone documents. K. Hill clarified that it is not appropriate for reports to reference a reviewer to another document for information like site history or environmental setting. The RFI Report should, at a minimum, present the information in an abbreviated manner and then reference the reader to another document.

P. Shanley provided the text of the HRMB correspondence and some applicable Federal Register pages.

### **Agenda Item 3: Definitions of Stabilization Activities**

LANL provided a one page flow diagram of their interpretation of stabilization activities which had stabilization broken into two main divisions: best management practices and interim measures. Discussion on this topic led to the identification that LANL and HRMB disagree as to the requirements identified in Section J, Interim Measures of Module VIII. LANL indicated that NMED's view that LANL must notify of routine construction work in a SWMU was contrary to the way past work had been conducted under EPA oversight and that LANL's understanding had of the requirements for routine construction in a SWMU had been submitted to HRMB.

**Action Item:** P. Shanley will fax LANL letter on routine construction in SWMUs to HRMB.

Dave McInroy distributed a Draft Stabilization Process document which consists of text on when to implement a BMP or interim measure along with a flow diagram. NMED indicated that they believed actions such as debris pickup should not be a BMP but would be an interim measure. Discussion on the differences between BMPs and IMs continued.

**Action Item:** HRMB will review the draft stabilization document and provide comments to LANL by next month's meeting.

### **Agenda Item 4: FY97 Accelerated Cleanups**

D. McInroy provided copies of one table identifying all planned VCAs and VCMs for this year and the fact sheets for all the VCA/VCMs. HRMB stated their appreciation for the information. NMED will review the fact sheets to determine which VCAs they need presentations on. NMED expressed an interest to see the same type of information for 1998 to help determine grant commitments. D. McInroy indicated that LANL will put as much information on this together as they can by next months meeting. Caution on the possibility that the FY98 VCAs may change was provided by J. Mose. Change is likely because the baseline for 1998 is not yet set and may not be approved for many months.

**Action Item:** NMED will review 1997 VCA Fact Sheets. NMED will notify LANL one week prior to the next meeting of any VCA presentations needed for that meeting.

**Action Item:** D. McInroy will provide a list of "reasonably certain" VCAs for 1998 by next month's meeting.

## **Agenda Item 5: EPA Visit**

LANL requested NMED input on the agenda for the upcoming EPA visit. NMED indicated that they would be having an NMED/EPA only meeting on April 21 p.m. and April 22 a.m. NMED indicated that they understood that the agenda had already been set between EPA and LANL. LANL indicated this had not been accomplished. NMED indicated the following area of interest: MDAs at TA-21 (A, B, U, and V) and TA-16 (R, and T), TA-50 MDA C; and the TA-73 Airport Landfill. NMED and LANL will determine a schedule over the next week which will determine whether sites will be visited prior to or after an NOD discussion.

**Action Item:** NMED will contact EPA and let LANL know the agenda items as soon as possible.

### **Other Items:**

The need for a meeting prior to responding to the NOD for TA-18/27 was identified. Kim Hill indicated that she was available to meet with LANL during the morning of April 21.

**Action Item:** D. McInroy and J. Mose will coordinate with LANL staff to arrange the meeting.

The meeting minutes were revisited and the following action items were assigned.

**Action Item:** D. McInroy will revisit the criteria for revising or writing a new SAP with FU 3 on the TA-16 260 outfall work. A new SAP may be needed.

**Action Item:** D. Hickmott will inform T. Davis on the material that was used to plug borehole 2707.

The next meeting is scheduled for May 13 at 8:30.