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To: John Kieling, LANL Facility Manager
From: Michael Chacón, Water Resource Specialist III *MC*
 Neelam Dhawan, Environmental Specialist *ND*
 Kim T. Hill, Environmental Engineer *TS*
Subject: LANL ER Monthly Meeting Notes
Date: July 10, 1998

MEMORANDUM

The following notes are from the LANL ER Monthly Meeting which occurred on July 9th. Meeting dates which were scheduled at the meeting are highlighted.

Discussion of Top Priority PRSs: LANL handed out a draft table entitled "Status for Top Priority PRSs at LANL" for comment. DOE/LANL and HRMB discussed modifications and additions to the table columns and the type of information which would be useful to include in it. DOE/LANL agreed to make the modifications and work with HRMB such that a finalized format could be presented at the next ER Monthly. HRMB staff (K. Hill) agreed to place these sites on the LANL Working Group agenda for 7/10/98 and to provide input to a "NMED Issues" column for these sites.

Septic System RFI/VCA/VCM Process: DOE/LANL provided HRMB with a handout entitled "Septic System Approach." This handout describes a list of factors that DOE/LANL feels should be considered when investigating and remediating a septic system. HRMB expressed the need to develop a guidance document (a position paper, perhaps) that would apply to facilities state-wide. DOE/LANL asked that we consider these factors when developing HRMB guidance.

Status of Ecorisk Review: HRMB indicated that B. Toth was in possession of the LANL-specific ecorisk approach. She will begin the review next week and should have comments drafted in the next couple of weeks. B. Toth will contact E. Kelly (LANL) to give her feedback on the document. DOE/LANL may wish to include an ecorisk status on the August ER Monthly agenda.

Status of Action Items from Previous Meetings:

- MDA P: A letter has been drafted which compares the actual plans with what was proposed in the closure plan. This letter is anticipated to be sent to HRMB by the end of next week (7/17/98).
- PTS Report/Quarterly Report: On 7/8/98 LANL (H. Orr) began discussions with DOE to coordinate revision to the PTS Report such that it would eliminate the need for the Quarterly Report.
- OU 1114 Workplan: LANL (D. McInroy) contacted EPA (R. Mayer) to find out the status of the OU 1114 Workplan review. The Workplan is currently in its second NOD cycle and a meeting with EPA will be scheduled to resolve lingering issues.
- BMPs: DOE/LANL provided HRMB with a draft version of a BMP database. This database will be formally sent to HRMB by the end of next week (7/17/98).
- Revised Set of PCT Memos: The PCT memos will be placed on the August ER Monthly Meeting agenda.

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- NFA Format: HRMB advised DOE/LANL to bring a draft format to J. Kieling as soon as possible for review.
- LDR Phase IV-Final Rule: DOE/LANL wished to know how this final rule might affect MDA P (which is being addressed under a previously approved workplan) and is the State planning to adopt or accept this rule. HRMB staff (K. Hill) agreed to contact J. Tymkowich to see if he was aware of the issues and to ask him to contact Holly Wheeler (667-0808).

Prioritization of NMED Review of Submitted Documents: DOE/LANL brought up several issues regarding concerns with HRMB prioritization. One such issue was the continual review of documents which DOE/LANL considers to be low priority. HRMB staff explained that there were many factors (such as the EPA grant, EPA workshare, etc.) involved with the order, assignment and review of documents. DOE/LANL was concerned that the review of backlog documents subsequent comments were diverting resources from working on higher priority sites. DOE/LANL introduced the possibility of "withdrawing" those documents with known deficiencies or of low priority such that the regulatory review would be stayed. One other concern identified by DOE/LANL was the possibility of having to resubmit withdrawn documents under the new fee regulations. Because this issue involved agreements made by middle and upper management, HRMB staff recommended that a separate meeting be set up with the appropriate individuals (possibly B. Garcia, J. Canepa and D. Neleigh) to resolve this continual problem.

Prioritization of Outstanding Technical Issues:

- BMPs, IAs, IMs (Priority #3): LANL will provide HRMB with a list of considerations/concerns for input into a HRMB guidance document at the next ER Monthly Meeting.
- Aggregation of Sites (Priority # 1): DOE/LANL and HRMB staff (J. Kieling/M. Chacon) will meet on July 15 to scope and discuss those types of sites requiring aggregation or being considered appropriate for aggregation. DOE/LANL will then take that information and develop some sort of list of PRSs appropriate for aggregation. As a side issue, the group discussed such sites as 36-006 which are active or within the zone of influence of another active firing site(s). It was mentioned that in these situations, the active site should be permitted and language should be included within the permit such that SWMUs within the zone of influence would be addressed upon closure of the unit.
- Canyons-Remedial Actions Hand-off (Priority #4): DOE/LANL is in the process of developing a policy which defines this "hand-off." A possible meeting date will be set (TBD) with HRMB staff (J. Young) to discuss this policy.



- HSWA Module Reissuance (Priority #2): A tentative meeting date has been scheduled for July 20th (9 am) to discuss the scope and begin scheduling revisions to the permit language. LANL ER (D. McInroy), WM and HRMB staff (M. Chacon) will attend this meeting.
- Canyons Workplan Format (deleted): This issue was previously laid to rest.

Additional Items (not currently on agenda):

- LANL is undergoing a database review by Harding-Lawson. They would like for a representative to meet with NMED to discuss their data needs including analytical (data, etc.) and PRS-specific (schedule of compliance, etc.) requests.
- 0-016: A site visit and meeting between LANL (W. Neff) and HRMB staff (K. Hill) was scheduled for 8:30 a.m. on July 22nd to discuss the rejection of the 0-016 VCA Report.
- Use of DOE OB Comments: DOE/LANL expressed concern that HRMB was utilizing DOE OB comments verbatim in Supplemental Information Requests and Notices of Deficiency. HRMB staff (K. Hill) agreed that using the comments verbatim was an inappropriate use of DOE OB comments and that it would be brought to the attention of middle and upper management through the appropriate chain of authority. HRMB staff (K. Hill) also stated that it would be beneficial to all if HRMB had a policy or issued a memo defining the appropriate use and application of DOE OB comments.
- TA 53: DOE/LANL informed HRMB of a meeting to be held in Santa Fe on July 17th at 1:30-3:00 p.m. to discuss environmental improvements.
- TA 0: DOE/LANL informed HRMB that they have received two Supplemental Information Requests and one NOD on a TA 0 VCA Report. DOE/LANL responded to the first RSI. When the second RSI was received, they contacted HRMB and were told to await further instruction. During this time, they received a NOD. Therefore, DOE/LANL is now required to respond to both a RSI and an NOD. HRMB staff (K. Hill) agreed to draft a letter withdrawing both the second RSI and the NOD until an evaluation of the situation has been made.
- EPA Sampling: DOE/LANL informed HRMB that EPA will be sampling at LANL during August. ESH-18 will delay their sampling until August and perform the sampling such that EPA may take split samples.
- *Revision to cc List: DOE/LANL requested that Michelle Kirsch (MS M992) be added to the list of cc's for all LANL/DOE correspondence.*
- TA 18/27 Activities: DOE/LANL is in the process of defining if the removal of 3 septic systems at TA 18 would be considered a VCA/M or an IM. This will be placed on the agenda for the August ER Monthly Meeting.



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cc: B. Toth, NMED HRMB
J. Young, NMED HRMB
L. Winn, NMED HRMB
File: Reading and HSWA LANL G/P/98-C
Track: LANL, doc. date, NA, J. Kieling, NMED HRMB/kth, RE, file