

General

Darlene Goering

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From: Gregory, David R. [dgregory@doeal.gov]  
Sent: Monday, September 23, 2002 10:27 AM  
To: 'Darlene Goering'  
Subject: RE: Land Transfer at LANL



Options for C-4.doc

Darlene:

Just an FYI.  
We are going ahead with option 2 as outlined in the attachment. I would have preferred to discuss with you before moving on.  
David Gregory  
<<Options for C-4.doc>>

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> From: Darlene  
> Goering[SMTP:Darlene\_Goering%nmenv.state.nm.us@internet.al.gov]  
> Sent: Friday, August 30, 2002 1:16 PM  
> To: Gregory, David R.  
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> David,  
>  
> Sorry I couldn't get back to you earlier about Tuesday. I am not clear on  
> why we need to meet. Presently, I don't see any issues with that tract  
> (C-2)  
> and if you would like that in writing, DOE will need to submit something  
> for  
> a formal response. I have already reviewed everything that has been  
> received  
> on the White Rock tract. A meeting at this point would seem futile. Let me  
> know if you have any questions.  
>  
> Darlene  
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>



## OPTIONS FOR TRANSFER OF C-3 (WHITE ROCK "Y"-3)

Option	Description	Estimated Cost	Timeframe	Discussion	Pros	Cons
1	Argument	7K	1 mo.	Use argument that even if contamination were found on the sub-parcel, no remediation within right-of-way would be implemented due to limited exposure and current and future land use	Quickest and cheapest	May not meet intent of CERCLA 120(h) covenant; may be legally complex; may not be well received by NMED
2	EPA/NMED Data	30K	1+ mos.	Use existing EPA/NMED sampling data (1998) from either side of right-of-way	Existing data; can meet transfer timeframe (i.e., report can be generated over winter)	Number of data points probably not statistically sufficient to assess potential risk (uncertainty high but can bolster with Option 1 argument)
3	Sampling Event	60K	3+ mos.	Collect samples specific to LT sub-parcel	Potential risk can be fully assessed	Cost and time prohibitive; duplicative effort (Sandia Canyon Work Plan)
4	S-5 Reach & Evaluation	200+K	6+ mos.	Fully implement Reach S-5 East of the Sandia Canyon Work Plan	Completion of entire reach with high quality data and adequate information to fully assess the potential risk	Cost and time prohibitive – Reach S-5 East not currently scheduled for implementation until FY10/22 (priority must be changed by DOE)