

From: Dhawan, Neelam, NMENV
To: "Veenis, Steve"; Briley, Siona, NMENV
Cc: Kostrubala, Thaddeus Lewis; Rodriguez, Cheryl L
Subject: RE: Response to LA Weir NOD
Date: Friday, July 22, 2016 1:31:13 PM



Steve

SAR work plan outline looks ok. It is basically a work plan that should provide site history and sampling plan to characterize the site. Please include the parameters used in your RUSLE2 model. For SAR, residential risk screening would be sufficient in accordance with the Order Section X.C. After we review the investigation results we can decide on path forward. For final evaluation I think we may need to look ecological and other risk scenarios.

Thanks

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From: Veenis, Steve [mailto:veenis@lanl.gov]
Sent: Thursday, July 21, 2016 9:28 AM
To: Dhawan, Neelam, NMENV; Briley, Siona, NMENV
Cc: Kostrubala, Thaddeus Lewis; Rodriguez, Cheryl L
Subject: Response to LA Weir NOD

Hi Neelam-

We are finalizing the SWMU Assessment Report (SAR) work plan for the Los Alamos Weir sediments placed in the borrow pit, and would appreciate your review of our assumptions and work plan structure to confirm this is what NMED is looking for before submitting the work plan.

Work Plan Outline:

There does not appear to be a formal outline to follow for the SAR work plan. If there are any sections that you believe need to be added to the SAR work plan outline below, please let us know.

1.0 INTRODUCTION

- 1.1 Work Plan Overview
- 1.2 Work Plan Objectives

2.0 BACKGROUND

- 2.1 General Site Information
- 2.2 History of Placement of Sediments in the Borrow Pit
- 2.3 Current Conditions
- 2.4 Results of Previous Sampling
- 2.5 RUSLE2 Modeling

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3.0 PROPOSED INVESTIGATION ACTIVITIES

3.1 Sampling and Analysis

3.1.1 Sample Locations and Depth Intervals

3.1.2 Sample Analyses

3.1.3 Investigation Methods

3.2 Data Evaluation

3.2.1 Identification of COPCs

3.2.2 Human-Health Risk Screening Evaluation

4.0 SCHEDULE

5.0 REFERENCES

Appendixes

Appendix A Acronyms and Abbreviations, Metric Conversion Table, and Data Qualifier Definitions

Appendix B Site Photographs

Appendix C As-Built Drawings

Appendix D Analytical Data (on CD included with this document)

Appendix E RUSLE2 Modeling and Biannual Inspections

Key Assumptions:

- NOD Response to Comment 1 will indicate that a Revision 2 to the 2013 Excavation Report is NOT required and information on controls will be presented in the SAR Work Plan (per June 21 meeting).
- NOD Response to Comment 2 will indicate that a SAR Work Plan has been submitted under separate cover and will address Comment 2 (per June 21 meeting).
- SAR Work Plan will include:
 1. A history of activities to date including: report on the 2014 excavation activities, current condition photos, timeline of activities (limited to activities at borrow pit, not all excavations from weir)
 2. As-built set of sheets detailing the following information pertaining to the borrow pit sediments: estimated volume of placed materials, extent of demarcation liner, topography with cross sections (material and berm), BMPs constructed, water holding capacity of the berm, technical specifications to which the work was performed, results of RUSLE2 modeling.
 3. All analytical results collected to date for sediments in borrow pit.
 4. Work plan for collecting additional data.
 5. How data will be evaluated to identify chemicals of potential concern (COPCs) and estimate risk.
 6. Milestone schedule for completing SAR (generalized since dates of completion are based on NMED HWB approval of SAR Work Plan).
- SAR Work Plan will propose investigation of the borrow pit materials collecting 24 samples – 8 locations at 3 depths. The deepest depths will be within 2 feet of the demarcation liner targeting 2011 sediments.

- SAR Work Plan will propose the same investigation suite of analysis performed in 2013 and 2014: PCBs, pesticides, herbicides, dioxins/furans, target analyte list metals, cyanide, and radionuclides.
- SAR Work Plan will not propose any composite sampling nor use any existing composite sampling data in the data evaluation.
- SAR Work Plan will propose comparing investigation results to background values and background data sets to identify COPCs; then, the cumulative human-health residential risk screening will be performed for all COPCs (same approach used in CO Investigation Reports) (per June 21 meeting).
- SAR Work Plan will include results of the NMED DOE-OB storm water sample collected from borrow pit runoff.

Consistent with Section X.C of the June 2016 Consent Order, the SAR will only include human health residential risk screenings using the data obtained during the SAR investigation, and additional human health exposure scenarios (e.g., recreational, construction worker) and ecological risk will not be evaluated.

This approach is aligned with Section X.C of the 2016 Consent order, which states “DOE shall develop and implement a preliminary screening plan (including sampling and investigation activities and schedule for those activities) for such newly discovered potential SMWU or AOC, and provide NMED with the results of the preliminary screening.”

Thanks in advance for your feedback,

Steve