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FACSIMILE TRANSMITTAL SHEET



U. S. DEPARTMENT OF ENERGY

LOS ALAMOS AREA OFFICE
Office of Environment and Projects

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DATE: 3/26/96 # PAGES TO FOLLOW: 2
Ron Kern
TO: Barbara Hoditscheck FAX NO. 827-4361
FROM: Bonnie Koch 665-7202

REMARKS:

Please review these minutes for any inaccuracies I may have recorded.

Thank you
B Koch



FILE LANL HSWA / 1074 0-016

72

attachment 1

Meeting Minutes/ HRMB 3-15-96

Meeting Minutes
 NMED HRMB Review of SWMU 0-016 Shaker Plant VCA Plan
 March 15, 1996

1. Executive Summary Presentation to Benito Garcia. Benito's comments on the Shaker Plant approach: fewer fines will be removed. Reply was that soil already "technically meets TCLP as documented by sampling of piles this fall. Shaker plant will quickly identify the hot spots. The approach designed to be very discrete in the sense that 25 cubic yard loads will be processed and sampling is for grabs. Bullet buildup on sieve screens will make it evident when bullet hot spots are being processed. Soil washing and shaking are both a form of sieving; washing is just wet and shaking is dry -- as said informally by J. Dougherty. Therefore, shaking is still recycling and the TCLP requirements can be met. However, since sampling is discrete, any soil that does not pass the screening test will be easily identified and can be disposed of as hazardous waste. Benito asked about the CAMU but reply was that this approach is faster and cheaper. Benito did not express any further concerns with the method. However, he said Stu had indicated that EPA might be concerned that since dilution had occurred recycling could not be used. J. Dougherty had not indicated this to B. Koch who had talked to J. Dougherty frequently. But Benito said HRMB would try to find out what was going on, if anything, behind the lines with EPA on this issue.

2. B. Hoditscheck and S. Dinwiddie's only comment on the plan, in addition to Benito's concern about what could be going on behind the lines with EPA, had to do with future land use: Land exchanges apparently take place under CERCLA. CERCLA stipulation is that federal agency cannot pay for the remediation if there is a land exchange.

3. Ron Kern's comments, in reference to XRF screening: he cannot accept the correlation as presented in the plan because there are not enough sample points for the ICP/XRF correlation. He would prefer to see a TCLP vs. XRF correlation, which LANL thinks is also achievable, but again, there are not enough sample points. Ron Kern recommends that the first ten loads, or so, through the plant put the piles all on hold while TCLP and XRF are both run to establish a correlation. LANL will come back to Ron Kern with the correlation and if it is adequate, the XRF threshold will be set by Ron Kern at this time. If no correlation is possible, but there is fairly clear indication that from existing data that only a few more sample points will be required, then each 25 cubic yard run will receive TCLP analysis. Ron Kern had concerns about the cleaned soil in a drainage area at TA-72. However, storm water diversion is scheduled for TA-72. Also, he is concerned that enough samples will be taken at the site for confirmatory sampling. The sampling plan calls for 23 samples on the ground and 3 in the drainage. This approach is the same one attached to the original VCA Plan; EPA had no comment in 1994 about this portion of the plan being inadequate. Ron was also concerned about the storm water control in the active firing range.

4. Summary: B. Hoditscheck said that she thinks "the approach is a very good one." She and

*suggested
 w/ to stipulation
 of number of
 pile*

0-016

*did
 not have
 any issue
 about TA-72
 because I
 am not familiar
 w/ it.*

attachment 1

Meeting Minutes/ HRMB 3-15-96

I did not see anything to ~~allow~~ not allow to proceed at risk!

Ron Kern recommend proceeding because it is voluntary. However, Dave McInroy said LANL would prefer to know that there are no outstanding issues in the area of hazardous waste; LANL/DOE would rather make sure that EPA has no further issue beyond their October 10, 1995 letter to HRMB before proceeding. It was decided that if no communications are found indicating that EPA has a continuing issue with dilution then LANL will proceed with the operations in two weeks; B. Koch will call B. Hoditscheck prior to the day of initiation. B. Hoditscheck and S. Dinwiddie would check back with EPA; B. Koch asked if B. Hoditscheck would mind if she also called J. Dougherty.

5. Action Items:

a. B. Hoditscheck and S. Dinwiddie will research whether EPA has a continuing concern with dilution. B. Koch will also call J. Dougherty about this.

OK (Kern looking at)

(?) B. B. Koch will give Ron Kern a copy of the EPA SOP for the Spectrace 9000 SRF. A copy of the TA-72 Stormwater Plan and the Confirmatory Sampling Plan for the site will also be sent to him.