

MEETING RECORD

Date: September 8, 2005

Subject: LANL's June 2001 NFA proposals for 24 SWMUs (LA-UR-01-2793; ER2000-0363) and September 2002 NFA proposals for 5 SWMUs (LA-UR-02-5833; ER2002-0624)

Attendees: Neelam Dhawan, NMED Hazardous Waste Bureau ND
Linda Nonno, LANL RRES-R Regulatory Compliance Focus Area

Background: Upon Neelam's 2002 review of the Subject document, Linda and Neelam arranged to meet on August 27, 2002 to discuss each of the proposed SWMUs and to provide clarifications as needed. From the fall of 2002 through the spring of 2005, during Order negotiations, Linda and Neelam had to suspend all permit modification request interactions. Neelam and Linda resumed meeting on the proposals in August and September of 2005.

This meeting record has been drafted by Linda Nonno, LANL ENV-ECR Regulatory Compliance

SUMMARY OF 8/27/2002 MEETING:

Linda requested that Neelam first convey to her all SWMUs for which Neelam concurred NFA without further discussion or clarification. Neelam concurred that NFA was appropriate for the following eight SWMUs:

01-001(m), a septic tank	16-025(e2, f2, h2), areas of potential contamination
C-08-010, the site of former drum storage	16-026(a2), an active outfall & assoc. drainline
15-010(c), an active storm drain & outfall	20-003(a), a former firing site control building

Next, Linda and Neelam discussed each of the remaining 16 SWMUs as follows:

SWMUs 00-011(a) and 00-011(e), former mortar impact areas

Neelam stated that EPA, Region 6, had recommended institutional controls for these two sites, because the history for similar sites has yielded only a 60% – 80% shrapnel recovery rate. Neelam agrees that some type of an institutional-control monitoring plan is required. Therefore, she will not consider NFA for these two sites until the Laboratory has developed some sort of monitoring plan for them.

SWMU 03-046, active aboveground wastewater treatment tank

LANL formally withdrew this site on August 23, 2001 because it had been submitted under the wrong NFA criterion. LANL plans to resubmit this site later in 2002.

SWMU 08-005, crystal incubator

Neelam stated that LANL needs to collect a few more samples to show that the extent of residual metals has been defined. Linda clarified that the presence of metals was not process related. Neelam agreed, but she still wants a couple of samples downgradient and at depth to show extent. She thinks it makes sense to take one sample at depth from the area formerly occupied by the incubator and approximately 3 more samples in the drainage downgradient.

14-003, a former burn area for HE debris

Neelam requested the gamma spec. analytical results which were not included. Linda stated that she thinks that the gamma spec. data consist of screening results only, but she needs to check and will get back with Neelam after September 30 (the end of LANL's fiscal year). Neelam also stated that once she has the gamma spec data, Kirby will need to review the eco screening assessment.



15-014(l), an active NPDES-permitted outfall

Neelam stated that Ralph Ford-Schmitt had spoken to Mike Saladen, who stated that this is not non-contact cooling water outfall, as indicated by its 03A designation. She also provided Linda with an NPDES Fact Sheet (attached) from EPA. Linda is to do further research and get back to Neelam (after September 30).

16-026(d2, e2, f2, g2, h, k, x) and 16-030(b, e, f), ten outfalls and their associated drainlines

Neelam stated that all 10 sites were a concern because of the transformer oil involved and that, as a result, PCBs may be a contaminant. Linda explained that none of these sites were associated with transformers and that PCBs are not present. The oil was motor oil used to lubricate the motors of small compressors only. Neelam stated that she thought that all historical motor lubricating oil contained PCBs, but that she would check with John Kieling and get back to Linda. See results of 8/27/02 phone call described below.

16-026(t), outfall and associated drainlines

Neelam asked for clarification on how the roof drains by-passed the floor drains. Linda clarified that the roof drain system was a completely closed system and showed her that the engineering drawings provided in the June document (as well as a site visit) confirmed this. At the conclusion of their discussion, Neelam concurred with NFA for this site. See the updated list at the end of this record.

Letter format discussion

Linda asked Neelam if it was OK to put the verbally approved NFAs into the same Request for Permit Modification that would be made for those sites that had received NFA approval letters from NMED. Neelam said that she thought two letters were required because LANL had already gone to public notice with the NFAs discussed at this meeting, but had not done so for the sites for which LANL had received approval letters. Neelam agreed to ask John Kieling for a clarification and Linda agreed to check with Paul Schumann and/or Dave McInroy. See results of 8/27/02 phone call described below.

SUMMARY OF 8/28/02 FOLLOWUP PHONE CALL FROM NEELAM TO LINDA

Neelam phoned Linda to state that she had spoken with John Kieling and that he stated that two separate permit request letters were required. (Linda subsequently checked with Dave who agrees that two letters are needed.) Neelam also stated that she had talked to John about the historical use of lubricating oils. John had agreed that PCBs are not involved. Therefore, she concurred with NFA for the ten sites [16-026(d2, e2, f2, g2, h, k, x) and 16-030(b, e, f)]. See updated list at the end of this record.

UPDATED LIST OF CONCURRED NFAs BASE ON 8/27/02 MEETING AND 8/28/02 PHONE CONVERSATION:

The following 19 sites were concurred for removal from the permit

01-001(m)	16-026(t)
C-08-010	16-026(d2, e2, f2, g2, h, k, x)
15-010(c)	16-030(b, e, f)
16-025(e2, f2, h2)	20-003(a)
16-026(a2)	

SUMMARY OF 8/25/2005 MEETING:

Linda and Neelam discussed a process for working through each of the pending permit modification proposals. Linda will submit a letter to NMED withdrawing the sites requested for removal based on the Military Munitions Rule exemption.

Next they began discussions on the pending requests.

September 2002, Request for 5 SWMUs:

03-011

Linda to request a certificate of completion.

03-046

Neelam has the following questions/issues:

When was the NPDES first issued?

Did the tank discharge prior to the outfall being NPDES-permitted?

LANL needs to clarify that releases were from the outfall rather than the tank and perhaps change the NFA Criteria.

What chemicals were used as water softeners and demineralizers?

Linda suggested that Neelam discuss the tank with the SWRC subject matter expert. A meeting for this discussion is set up for October 26. In addition, Linda is to call Neelam with reference numbers for 03-046 references.

16-026(f)

Linda to request a certificate of completion.

16-030(c)

Linda to request a certificate of completion.

73-004(c)

Linda to request a certificate of completion.

SUMMARY OF 9/8/2005 MEETING:

Linda and Neelam continued discussions on the pending requests.

June 2001, Request for 24 SWMUs:

Neelam stated that she was still OK with the 19 sites that had been concurred for removal from the permit in 2002. A discussion of what to do on the remaining 5 sites ensued:

SWMUs 00-011(a) and 00-011(e), former mortar impact areas

These sites are being addressed in the Guaje/Barrancas/Rendija Canyons work plan. Linda to formerly withdraw.

SWMU 03-046, active aboveground wastewater treatment tank

LANL formally withdrew this site on August 23, 2001 because it had been submitted under the wrong NFA criterion. LANL resubmitted this site in the Sept. 2002 request. See discussion under Sept. 2002.

SWMU 08-005, crystal incubator

Neelam requested that LANL collect a few more samples to show that the extent of residual metals has been defined. Samples should be taken downgradient and at depth to show extent. She thinks it makes sense to take one sample at depth from the area formerly occupied by the incubator and approximately 3 more samples in the drainage downgradient.

14-003, a former burn area for HE debris

Neelam requested the gamma spec. analytical results which were not included with the request. Linda to check on data.

15-014(I), an active NPDES-permitted outfall

Neelam stated that Ralph Ford-Schmitt had spoken to Mike Saladen, who stated that this is not non-contact cooling water outfall, as indicated by its 03A designation. She also provided Linda with an NPDES Fact Sheet (attached) from EPA. Linda is to do further research and get back to Neelam.