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M E M O R A N D U M

To: Jim Piatt, Chief, Surface Water Quality Bureau

From: Alex Puglisi, AIP/SWQB  
Danny Katzman, AIP/HRMB

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CONFIDENTIAL

Date: April 12, 1993

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Subject: AIP Review of Sampling and Remediation Plan for SWMU  
3-010

This memo represents the technical comments from Agreement In Principle (AIP) staff on the "Sampling and Remediation Plan for Mercury Contaminated Soils at TA-3-30". These comments address the "revised" submittal of the Plan which was written in response to comments previously provided through the AIP and the Surface Water Quality Bureau dated January 21, 1993.

Page 3-4, paragraph 5

It is commendable that a conservative cleanup level of 100 mg/kg has been chosen for TPH.

Page 4-8 paragraph 1,2

It is agreed that some degree of homogenization of sediment and thus contamination (if it exists) would occur during periods of high runoff, justifying the vertical compositing of samples from the stream channel. However, it is unclear whether horizontal stream-channel composites mentioned in paragraph 1, page 4-8 will be treated in the same manner as horizontal composites on the slope (i.e. setting a trigger level that equals the cleanup level of 20 ppm divided by the number of subsamples comprising the composite sample). Stream-channel samples should be treated in at least as conservative a manner as the slope samples.

Page 4-8, paragraph 3

This paragraph appears to be a response to an earlier NMED comment that recommended that samples analyzed for radionuclides should target the silt- and clay-sized fraction of the sediment/soil. This approach is still recommended, however, it should not apply to samples and analyses conducted for heavy metals (e.g. mercury). In a simple system, elemental mercury "beads" would be expected to behave hydrodynamically similar to grain sizes much larger than the beads. In a high-energy system with flashy discharge, such as the stream channel in this investigation, mercury "beads" could be expected to occur associated with any grain size. Therefore, mercury should be analyzed from bulk samples.

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Page 6-2, Schedule

Given the likelihood that the remedial option will be removal by excavation, could the "Select Treatment/Disposal Option" and "Prepare Bids, Select Contractor(s)" activities be done in parallel with sampling and evaluation activities? This shift in the schedule could result in removal of soil at the site up to eight weeks earlier as well as eliminate the need to cover the site in the intervening time between the investigation and actual remediation.