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**NEW MEXICO
ENVIRONMENT DEPARTMENT**



**NMED-DOE-LANL TECHNICAL MEETING NOTES FOR THREE MILE
CANYON AGGREGATE AREA SUPPLEMENTAL INVESTIGATION
REPORT HELD ON FEBRUARY 7, ~~2017~~ 2018**

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NEW MEXICO
ENVIRONMENT DEPARTMENT



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Meeting Notes: Discussion of NMED draft comments for Three Mile Canyon Aggregate Area SIR (TMCAA SIR)

Meeting Date and Location: February 7, 2018 1:00 pm; HWB Rodeo Drive East Conference Room A

Attendees:

DOE EM-LA: Cheryl Rodriguez, Arturo Duran

LANS: Kent Rich, Randy Ryti

NMED-HWB: Neelam Dhawan, Robert Murphy, Dane Anderson, Paige Walton

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Discussions

1. Topic: NMED draft comment regarding the need for evaluation of risk to construction worker at sites included in TMCAA SIR where residential risk screening indicated that the site does not pose an unacceptable risk.

LANS questioned the need to conduct the construction worker risk screening evaluation at sites where the current and future land use is industrial and the site passes residential risk screening. NMED stated that LANS could either conduct a construction worker risk screening or demonstrate that residential risk screening evaluation indicates that it is protective of construction worker. LANS will respond to the NMED comment by addressing the construction worker scenario in the relevant chapters of the revised SIR. NMED concurred that LANS may use a line of evidence approach to address potential risk under the construction worker scenario rather than redo the risk calculations. The approach should demonstrate that the residential land use scenario is also protective of the construction worker.

2. Topic: NMED draft comment regarding concerns that the methods used to collect the samples for volatile organic compound (VOC) analysis during the 2009 TMCAA investigation resulted in VOC concentrations in soil samples being under detected and risk underestimated.

LANS stated that the sampling methods used during the TMCAA investigation were consistent with the standard operating procedure (SOP) at that time and that the deviation from the SOP occurred only at MDA-B due to unique difficulties with collecting the samples. The SOP was subsequently revised to provide more details about sampling methods. NMED stated that they do not approve SOP's.

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NMED would like some documentation provided that demonstrates that the SOP was followed during the TMCAA investigation, such as field notes and documentation of observations from the quality assurance (QA) officer. LANS does not think the field notes will have the necessary information but will try to provide them to NMED and emphasized that it is very difficult to demonstrate that the crew followed the correct sampling procedures 8 years after the fact. LANS will also provide copies of the original and revised SOP.

3. Topic: Strategy for responding to NMED comments for SIRs.

LANS proposed an email response in which each comment will be addressed. Once NMED and LANS agree on the responses, LANS will submit a revised SIR reflecting the agreed upon resolution of NMED's comments. NMED agreed to the proposed strategy and that it meets the requirements of the consent order.