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LANL  
VX

David Neleigh, Chief  
New Mexico/Federal Facilities Section  
RCRA Permits Branch  
Hazardous waste Management Division  
US EPA Region 6  
1445 Ross Ave., Suite 1200  
Dallas, TX 75202-2733

Dear Mr. Neleigh:

The New Mexico Environment Department (NMED) has reviewed the Los Alamos National Laboratory (LANL) proposals for Corrective Action Management Units (CAMUs) at Technical Areas 15 and 16. Following are comments addressing the concerns of the NMED Hazardous and Radioactive Materials Bureau (HRMB) in regard to the proposals as presented by LANL.

1. Although LANL did not address treatment of the wastes to be placed in the proposed CAMUs, the HRMB recommends establishing treatment before the waste is placed into the CAMUs. Perhaps EPA 6A Guidance Document for Superfund can be used as a model for establishing CAMU treatment standards.
2. The initial application should be expanded to verify that the sites are potentially appropriate for CAMUs and wastes which are proposed for management.
3. In the initial proposal, LANL proposes liners and caps for the CAMUs which deviate from approved EPA designs as indicated in 40 CFR Subpart N and EPA Document SW 867. LANL needs to demonstrate the reliability of their proposed designs.
4. LANL failed in the initial application to address the uppermost aquifer(s) at both proposed CAMU sites and must expand their discussion of the ground water situation at both sites.
5. The brief discussion of waste/site characterization in the initial proposal needs to be expanded greatly



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to include for example, sampling/analysis plans, verification of process knowledge for proposed CAMU waste treatment, etc. The HRMB also believes composite sampling is not acceptable method for waste characterization in most situations. Homogenous waste streams, if verified, could be an exception.

6. The need for long term reliability of the proposed CAMU at TA-15, based on the potential for damage to the CAMU by shock or airborne contamination due to continued explosive detonation events in the vicinity of the proposed CAMU must be thoroughly addressed.
7. The calculations of the actual CAMU design and capacity should be expanded. For example, the initial application indicates that the amount of waste to be placed in the CAMU would raise the bed of the CAMU above ground level. If this is true how will this affect the cap design integrity, etc. What are the limiting factors for above ground emplacement?
8. NMED understands that future permits within the area of the CAMU could be denied based on the presence of the CAMU.

If there are any questions about these comments please contact Ron Kern or Barbara Hoditschek of my staff at (505) 827-4308. We look forward to continued cooperation in developing the CAMU evaluation method.

Sincerely,



Benito J. Garcia, Chief  
Hazardous and Radioactive Materials Bureau

CC: B. Hoditschek, HRMB  
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