DEC 15 1994

Mr. Joseph C. Vozella
Assistant Area Manager
Environment, Safety and Health Branch
Department of Energy
Los Alamos National Laboratory
Los Alamos, NM 87544

RE: Proposal for Two Corrective Action Management Units (CAMU) at Technical Area (TA) 15 and TA-16
Los Alamos National Laboratory NM0890010515

0413 TA-15

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) and the New Mexico Environment Department (NMED) have reviewed the Corrective Action Measurement Units (CAMU) proposal submitted by Los Alamos National Laboratory (LANL) on September 29, 1994, and determined that additional information is needed prior to an initial determination being made by both EPA and NMED on whether LANL may proceed with the CAMU proposal. Enclosed is a list of questions, which LANL should respond to if LANL would still like to pursue its CAMU requests. In addition, I am enclosing a copy of the agreement between EPA and NMED outlining NMED's role in the CAMU approval process in New Mexico.

NMED will evaluate future permits within the area of the CAMU, and may deny permits for other units based on the siting of the CAMU.

Should you have any questions, please contact Barbara Driscoll at (214) 665-7441.

Sincerely,

William K. Honker, P.E., Chief
RCRA Permits Branch

Enclosure

cc: Mr. Benito Garcia
Bureau Chief, Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
Mr. Jorg Jansen
Program Manager, Environmental Restoration Program
Los Alamos National Laboratory, M992

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**Questions on Two CAMU Proposals**
**Los Alamos National Laboratory**

**Questions Which Relate to Both Proposals:**

1. Although LANL did not address treatment of the wastes to be placed in the proposed CAMUs, EPA/NMED would like LANL to identify what type of treatments might be used on the wastes.

2. LANL needs to expand their discussion of the sites chosen for the CAMU to include information related to the suitability and stability of these sites. This would include additional information about the geology at the sites, and the location of any faulting in relation to the sites.

3. LANL needs to provide additional information on the types of liners that will be used to meet the minimum technology requirements. LANL should also include a cross-section for each CAMU showing the monitoring and leachate collection systems.

4. If LANL is not going to use a standard RCRA cap then additional information should be provided which will demonstrate the reliability of their proposed cap.

5. The brief discussion of waste/site characterization in the initial proposal needs to be expanded greatly to include for example, information on sampling/analysis plans, verification of process knowledge for wastes, etc. Composite sampling is not an acceptable method for waste characterization in most circumstances; however, homogeneous waste streams, if verified, could be an exception.

6. The calculations for the actual CAMU design and capacity should be expanded. For example, using information in the initial application, calculations indicate that the amount of waste to be placed in the CAMU could raise the bed of the CAMU above ground level. LANL needs to demonstrate that the volumes of waste being discussed will adequately fit within the CAMU. LANL should also evaluate if treatment will increase the volumes of waste.

7. What type of air monitoring will LANL be conducting around the remediation areas and CAMUs during excavation and transport?

8. How does LANL propose to stabilize the areas from which remediation waste is removed? What actions will be taken to close out the sites from which the waste will be removed?

9. According to 40 CFR, Subpart K, § 264.221(c)(2)(ii) if geonet drainage materials are used the transmissivity should be $3 \times 10^{-4}$ $m^2$sec or more.

10. 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.

**Specific Questions Related to TA-15 Proposal:**

1. 3.1 Types and Quantities of Waste, p.8 - LANL should provide an explanation as to why they believe that beryllium may not be regulated under RCRA.

2. How will the radioactive component of the remediation wastes be addressed if the waste is determined to be low level radioactive waste?

3. Will LANL continue to conduct explosive detonation testing near the location of the CAMU in TA-15? If yes, then LANL needs to address the long term reliability of the proposed CAMU, based on the potential for damage to the CAMU by shock or airborne contamination due to continued explosive detonation events.

**Specific Questions Related to TA-16 Proposal:**

1. How will high explosive residues that are at concentrations above which detonation may occur be treated?

2. LANL needs to indicate on Figure 2 the location of the MTR unit within the designated CAMU area.