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**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

November 29, 1999

Dr. John Browne, Director  
Los Alamos National Laboratory  
P. O. Box 1663, Mail Stop A100  
Los Alamos, New Mexico 87545

Mr. Theodore Taylor, Project Manager  
Los Alamos Area Office  
Department of Energy  
528 35<sup>th</sup> Street, Mail Stop A316  
Los Alamos, New Mexico 87544

**RE: Comments on the Technology Feasibility Demonstration Project at PRS 15-004(f)  
Los Alamos National Laboratory, NM0890010515**

Dear Dr. Browne and Mr. Taylor:

The RCRA Permits Management Program (RPMP) of the New Mexico Environment Department's Hazardous and Radioactive Materials Bureau (HRMB) has conducted a brief review of the Technology Feasibility Demonstration Project Plan at Potential Release Site (PRS) 15-004(f) dated April 29, 1999 (referenced by EM/ER:99-108) and has some general concerns. These concerns are summarized below and primarily involve the use of the Segmented Gate System (SGS).

- *Effectiveness of SGS.* LANL asserts that the SGS is a proven innovative technology which has been successfully used to assay material and sort uranium-contaminated soils. It is premature for HRMB to concur with this assertion. The referenced 1996 TA-33 SGS project report was presumably submitted only to DOE. HRMB has not reviewed this information to assess the effectiveness or limitations of the SGS.
- *Site characterization.* Prior to using the SGS, the nature and extent of contamination at the PRS should be determined. Regardless of the ability of the SGS to segregate uranium-contaminated materials at a particular screening level, HRMB has concerns regarding the implementation of the SGS. LANL needs to address RCRA contaminants of concern prior to excavating the soil and effectively homogenizing and/or diluting it in the SGS.



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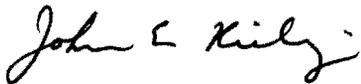
- *Homogenization of soil.* Adequate site characterization is crucial prior to this project due to the potential for soil homogenization/dilution as a result of the process of creating soil feedstock and the SGS. Soil may be processed through the SGS several times in order to reduce the volume of generated waste, resulting in further homogenization/dilution.
- *Risk scenarios.* LANL should be prepared in the future to present an evaluation of risk for both residential and industrial scenarios, as well as an ecological screening assessment.
- *Waste Management.* LANL states on page 12 of the plan that "...equipment at TA-15 will be pressure washed, and the water will be discharged on the site in accordance with the Notice of Intent (NOI) of August 1997." The cited NOI is not appropriate for this project. The NOI submitted to the Surface Water Quality and Ground Water Quality Bureaus on May 16, 1997 refers to the discharge of potable water for decontamination of tools and personal protective equipment at Environmental Restoration (ER) Interim Action (IA) activities within Field Unit 2, including PRS 15-004(f). The NOI states that the "de-minimus discharges will be attributable to Interim action activities and will result from procedures such as placing Storm Water run-on/off BMP's and picking up DU shrapnel and other types of debris from ER sites. No soil or surface disturbance will be initiated at these sites during these IA activities." The excavation of material for this project is outside the scope of this NOI. This project is not part of the IA activities performed at this PRS. A significant amount of time has elapsed since this NOI request and HRMB's approval of the IA plan in October 1997. Regardless of an NOI, if the discharge results from activities associated with a RCRA corrective action, waste management unit or area of contamination, LANL must submit waste characterization analyses to HRMB prior to any discharge to the environment or LANL should properly dispose of the media at a regulated facility.

Additional concerns regarding the implementation of the SGS project may be found in the supplemental information request for the 33-007(b), 33-010(c) and C-33-003 Voluntary Corrective Action Plan dated November 23, 1999. Should you have any questions regarding this

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letter, please contact me at (505) 827-1558 extension 1012 or Eliza Frank at (505) 827-1558 extension 1042.

Sincerely,



John E. Kieling  
LANL Project Leader  
RCRA Permits Management Program

JEK:eaf

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