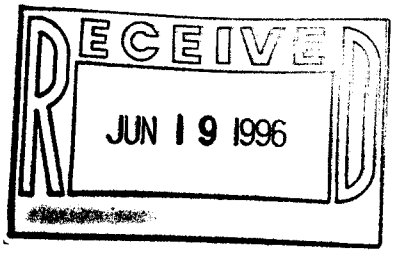
United States Government

Department of Energy
Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

memorandum

DATE: JUN 1 1 1996
REPLY TO ATTN OF: LAAO:EP:TJT:Closures:1.4.2.6.6.2.6.7
SUBJECT: RCRA Closures Meeting Summary

TO: Distribution



The subject meeting was held at the NMED office in Santa Fe on May 21, 1996, from 10:10 a.m. to 12:45 p.m.

Attending for NMED were B. Hoditschek, T. Davis, K. Hill, S. Kruse, and S. Hoines. Attending for the ER Project were P. Shanley (UC), D. McInroy (UC), A. Barr (UC), T. Taylor (LAAO), M. Johansen (LAAO), and E. Trollinger (LAAO).

M. Johansen opened the meeting by reviewing the cleanup levels/land use issues that were not yet agreed upon for TA-16 (MDA-P), TA-53, and TA-35 Closures in the Los Alamos National Laboratory's (the Laboratory) Environmental Restoration (ER) Project. Recent notices of deficiency (NOD) issued by NMED and NOD responses submitted by the ER Project have not resolved the issue. Some resolution was needed to allow key decisions such as the technical approach for TA-53 closure to be made and reprioritization and/or deferment of other planned work that would be needed if cleanup to background is pursued at any of these sites.

A. Barr and P. Shanley gave a regulatory overview on key concepts for closures, including that the regulations allow leaving hazardous constituents in place at levels that are not above regulatory standards and that do not pose an unacceptable threat to human health and the environment. If removal is performed, residual hazardous constituent levels must be (a) below established background levels, or (b) higher than background levels but not above regulatory standards and not posing an unacceptable risk to human health and the environment. Alternatively, sites can be closed as landfills with post-closure monitoring. Risk calculations utilize land use determinations and exposure scenarios established by the Owner/ Operator and approved by the Administrative Authority (AA). The overview was thorough and included two packets with summary sheets, citations, and excerpts from regulations, EPA policy (OSWER) directives, and Federal Register Notices.

Also discussed were the role of the Laboratory's Site Development Plan (SDP), the role of public participation, and the potential need for periodic review by the AA of changes in land use determinations. A contingency may be needed in the closure certification that may reopen investigation and/or cleanup if land use should change in the future.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D. McInroy presented the ER Project's approach and rationale for proposing an industrial future land use and associated cleanup standards at the three closure sites. Key points made included:

(1) the requirement for consistency with the Laboratory's long range land use planning, as illustrated by the SDP; (2) active/ongoing operations in close proximity to each of the sites;
(3) consistency with cleanup levels at surrounding historic potential release sites (PRS); and
(4) other factors, such as consistency with threatened and endangered species habitat protection. Increased costs of about 50% would occur if residential cleanup levels were achieved instead of industrial cleanup levels, which would result in the deferral of other ER Project work.

ACTION:

1. NMED requested a copy of the current Site Development Plan **(D. McInroy)** and a copy of the proposed land transfer plan between DOE and Los Alamos County **(M. Johansen)**.

2. NMED requested clarification on the role of the state and of the Citizens' Advisory Board regarding land use planning at the Laboratory **(T. Taylor)**.

The general discussion which followed focused on the following areas:

1. Relative cost of cleanup to industrial v. residential levels. It was reported by the ER Project that the increase in cost for the three sites is approximately $5.5 million.

2. Comparative risk assessments. It was agreed by the ER Project that where feasible risk assessments would be done for a residential future land use, as well as for the agreed to future land use. Where data are insufficient to conduct the residential risk assessment or where the cost of data acquisition is high, the ER Project may propose that a qualitative risk assessment be done.

3. Coordination between closure activity and ER and decommissioning activity. It was reported by the ER Project that coordination occurs for all aspects of the ER Project. When cleanup of PRSs, closure units, and decommissioning units at the same time is feasible, this is done. When this is not feasible, measures are taken to ensure the viability of all cleanups.

4. Relation between cleanup schedule and risk assessment schedule. This topic was thoroughly discussed, and the issue of the timing of risk assessments relative to cleanup activities was not resolved. Generally, future land uses and exposure scenarios are proposed in closure plans, exposure scenarios are approved by the AA, and risk assessments are conducted after the cleanup work has been completed to verify that

cleanup goals have been achieved. In some cases, when data are available, a preliminary risk assessment may be done prior to initiating cleanup activities; this would be done only at the request of the AA, and for qualitative comparative purposes only.

5. Conditions in closure certifications. The inclusion of conditions in closure certifications to provide for reevaluation of the adequacy of closure if future land use changes was discussed. This matter will be addressed as the closure plans are approved.

NEXT STEPS:

1. NMED will review the NOD response for the TA-16 (MDA P) Closure Plan **(B. Hoditschek and staff)**.

2. The ER Project has requested a 20 (working) day extension on submittal of the NOD response for the TA-53 Closure Plan, and will submit the response after the future land use and exposure scenario issue has been resolved **(E. Trollinger/D. McInroy)**.

3. The ER Project will conduct a risk assessment comparing residential and industrial future land use scenarios, using currently available data, for the TA-35 site, and will provide this information as part of the final closure report **(D. McInroy)**.

4. The ER Project will evaluate the feasibility of conducting a risk assessment using currently available data at the TA-53 site, and will conduct the risk assessment if it is feasible to do so at this time **(E. Trollinger/D. McInroy)**.

5. The ER Project will conduct a risk assessment at the TA-16 (MDA P) site after cleanup activities have been initiated and material has been removed to extent required to perform the risk assessment **(M. Johansen/D. McInroy)**.

6. The ER Project will clarify future land uses and propose risk assessment exposure scenarios in closure plans, and in NOD responses for those plans that have already been submitted **(M. Johansen/D. McInroy)**.

7. NMED will provide a response to proposed risk assessment exposure scenarios **(B. Hoditschek and staff)**.

Meeting summary prepared by

Theodore J. Taylor
Environmental Restoration Program Manager

Distribution:

1. Meeting Attendees
2. J. Jansen, EM/ER, MS M992
3. T. Baca, EM-DO, MS J591
4. J. Vozella, AAMEP, LAAO, MS A316
5. D. Griswold, ERD, AL, MS A906
6. R. Kern, NMED, HRMB
7. N. Weber, NMED, AIP
8. S. Yanicak, NMED, AIP
9. B. Garcia, NMED, HRMB
10. D. Neleigh, EPA
11. B. Driscoll, EPA
12. RPF, MS M707