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From: vickie_maranville@nmenv.state.nm.us
Sent: Wednesday, October 23, 2002 11:06 AM
To: kmv@lanl.gov
Subject: Annotated Outline for MDA P Closure Certification Report



Annotated Outline
MDA P Closur...

Attached are my draft comments of the proposed MDA P Closure Report outline. My comments are in redline/strike out (I thought it would be easier that why). Also, I need your fax number. I have reviewed the record of communication you sent to me and signed and dated a copy for your records. I would like to fax a signed copy to you. I have already entered a copy into the NMED Administrative Record. I will be in the office all day today if you have any questions (428-2546) or wish to discuss my comments. My main concern about the outline is that the actual text relies to heavily on the Appendices. The details need to be in the text of the report with supplemental information provided in the Appendix. Please feel free to call me and discuss my draft comments. Thanks.

Vickie.



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Executive Summary

1.0 Introduction

This section identifies the scope of activities and provides the framework for the closure activities at the MDA P Area (“MDA P Area” is the terminology adopted to describe the two regulated units and the PRS [hereinafter referred to as “units” for convenience] collectively). This section briefly describes the units and the breakdown of the closure activities into Phase I (excavation and waste disposition activities) and Phase II (focused geochemical fracture study and the final verification sampling activities).

1.1 Project and Report Objectives

This subsection introduces the purpose and objectives of the MDA P Area closure certification in the context of LANL’s Risk Reduction and Environmental Stewardship-Remediation (RRES-R) Program (Project Objectives) and applicable regulations and approved closure plans (Report Objectives).

1.2 Report Organization

This subsection presents the organization of information in this closure report, providing a 1-3 sentence summary of each of the main sections and appendices.

1.3 Scope of Activities

This subsection on scope of activities shall briefly describe all activities performed during closure event, including relevant background information research, implemented health and safety measures that affected or limited the completion of the tasks, drilling, test pit or other excavation methods, field data collection, survey data collection, chemical analytical testing, and IDW storage and disposal. This section should be a brief summary of what was done during closure.

1.31.4 Historical Use and Activities at the MDA P Area

This subsection includes a brief description of the historical use of the MDA P Area and points to Appendix B, which provides more detailed information on the past use and activities at the MDA P Area.

1.41.5 Site Description

This subsection introduces the general site setting for the MDA P Area and describes each of the MDA P Area units in 1.4.1 through 1.4.3. This subsection includes a brief description of the units and points to Appendix B, which provides further details.

1.4.1.5.1 MDA P

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This Section should also include a discussion on current site topography, features, and structures including topographic drainages, man-made drainages, vegetation and erosion features. This section should also include current site use and a description of any operations currently on-going at the site. Any features located surrounding the site that might impact sediment, surface or storm water runoff and run on, and contaminant transport (if applicable) should also be discussed in this Section.

~~1.4.21.5.2~~ 387 Flash Pad (see 1.5.1 above)

~~1.4.31.5.3~~ PRS 16-016(c)-99 (see 1.5.1 above)

1.5.1.6 Process Description

~~1.5.11.6.1~~ MDA P

This subsection provides a summary paragraph of RCRA-specific information for MDA P, including: hazardous waste operations conducted at the site (i.e., disposal), quantities and types of waste generated during the Phase I excavation activities, and applicable EPA hazardous waste codes.

~~1.5.21.6.2~~ 387 Flash Pad

This subsection provides a summary paragraph of RCRA-specific information for the 387 Flash Pad, including: hazardous waste operations conducted at the site (i.e., treatment), quantities and types of waste generated during the Phase I excavation activities, and applicable EPA hazardous waste codes.

~~1.5.31.6.3~~ PRS 16-016(c)-99

This subsection provides an explanation of how the regulatory status of PRS 16-016(c)-99 differs from that of the regulated units, and why a RCRA-specific process description is not included for this PRS.

2.0 Performance of Closure

This section provides the basis for the closure certification, including the specific information needed to demonstrate that the closure activities have been performed in accordance with all applicable regulations and the requirements of the approved closure plans.

2.1 Closure Performance Standards

2.1.1 Applicable Regulations

This subsection ~~summarizes~~outlines the specific regulations that are applicable to the MDA P Area closure.

2.1.2 Closure Plan Requirements

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This section ~~summarizes~~ outlines how specific requirements for this report, as outlined in the approved closure plans (and subsequent approved modifications), are met.

2.1.3 Closure Strategy

This subsection describes the strategy for combining the three units for the purposes of conducting clean-up activities and verification sampling and analysis. This section also discusses the basis for compliance with the clean closure performance standard.

2.2 Phase I Waste Characterization and Disposal

2.2.1 Closure Activities

This subsection describes the closure activities conducted during Phase I. Variances from the NMED-approved Closure Plans are detailed, with an emphasis on variances that significantly altered the closure activities (e.g., the change to remote excavation of the debris).

2.2.2 Waste Description

This subsection ~~summarizes~~ outlines information on the types and volumes of the debris excavated and waste generated as a result of the Phase I closure activities. Detailed information must be provided in this subsection. Supplemental information is provided in Appendix B. (The text of the report must contain all the details, Appendices can be referenced, but the details must be in the text, not the Appendix.)

2.2.3 Waste Disposition

The sampling and analysis performed to characterize the excavated waste for disposal at off-site facilities is ~~summarized~~ detailed. ~~A complete summary of the sampling and analytical results used to support waste management decisions is provided in Appendix B. Facilities that received the MDA P area waste are identified in this section. A complete summary of the sampling and analytical results used to support waste management decisions is provided in Appendix B. (The text of the report must contain all the details, Appendices can be referenced, but the details must be in the text, not the Appendix.)~~

2.3 Phase II Focused Investigations and Confirmation Sampling

2.3.1 Introduction

As described in this subsection, Phase II had two major components: the drilling and bedrock fracture study and the confirmation sampling and analysis.

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2.3.2 Exploratory Drilling

The purpose of, and general procedures used for, the exploratory drilling are ~~summarized~~ detailed here, here. Additional information the details of which are is provided in Appendix C. (The text of the report must contain all the details, Appendices can be referenced, but the details must be in the text, not the Appendix.) This section should include a description of the types of equipment used, the soil and rock classification system used to describe the encountered material, exploration equipment decontamination procedures, and conditions encountered that may have affected or limited the investigation. (For example, drilling locations were based on topographic limitations, some locations had to be moved to accommodate the drilling rig.)

2.3.3 Exploratory Well Boring Geophysical Logging

The results of the exploratory drilling are summarized here, the details of which are provided in Appendix C. (The text of the report must contain all the details, Appendices can be referenced, but the details must be in the text, not the Appendix.) This section should include a description of the method, dates of measurements, depth interval measured, and the results of the logging. The relative merits and limitations of each geophysical logging method employed shall be discussed, along with any field conditions or instrument malfunctions that may have affected the logging results. A map showing all boring and test pit excavations should be included.

2.3.4 Fracture Survey and Mapping

The purpose of, and ~~general~~ procedures used for, the focused study of fractures in the bedrock at the MDA P Area are ~~summarized~~ detailed in this subsection. (The text of the report must contain all the details, Appendices can be referenced, but the details must be in the text, not the Appendix.) Additional information is provided Results are summarized here, the details of which are provided in Appendix C. Cross-sections shall be constructed (if appropriate) to provide additional visual presentation of the fracture survey.

2.3.5 Confirmation Sampling

This subsection describes the second component of Phase II, the confirmation sampling and analysis. (Supplemental information Further details are is provided in Appendix E.) Variances from the NMED-approved Closure and Sampling and Analysis Plans are detailed, with an emphasis on variances that significantly altered the sampling strategy and results. (Again, the details must be in the text, the Appendix can be used to support the text, however, the text cannot be used to support the Appendix.) Dates, locations and methods of sample collection; sampling intervals; sample logging method; screening sample selection methods; and laboratory sample selection methods including the sample

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depths for samples submitted for analyses. A map showing the sampling locations should also be included.

2.3.6 Assessment of Potential Impact to Groundwater

This subsection presents the rationale for compliance with the groundwater aspects of the clean closure performance standard, based on LANL's assessment of the potential for post-closure impact to groundwater from the MDA P area. This assessment is based on Phase II investigations and other pertinent studies studies that are detailed in this subsection. (This section needs to be very detailed and contain all information needed to support decisions regarding groundwater monitoring at MDA P Area.)

2.4 Variances from NMED-Approved Closure Plans

This subsection provides a complete summary of all of the variances from the NMED-approved Closure and Sampling and Analysis Plans for Phase I and Phase II and the reasons for the variances.

2.5 Location of Supporting Documentation

Documentation supporting this Closure Certification is located in various places, the specific locations of which are provided in this subsection. I am unsure what this section is. If information contained in other documents is used to demonstrate closure, it must be included in the Closure Report. What about operating records? I thought thee would be summarized in this section?

3.0 Risk Assessments for the MDA P Area

This section summarizes the key features and results of the human health and ecological risk assessments based on the confirmation sample data, the details of which are provided in Appendix D. It also provides the rationale justifying how this set of risk assessments demonstrates compliance with the clean closure performance standard.

3.1 Introduction

This subsection introduces the basis for combining the MDA P Area units for the analysis of risk.

3.2 Conceptual Site Model

The Conceptual Site Model of chemical transport and potential exposure to human and/or ecological receptors developed for the MDA P Area is detailed in this subsection. The procedures used in the risk analysis are summarized, with a particular emphasis on the

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justification for using results from the Cañon de Valle focused ecological study to assess ecological risk from chemicals associated with the MDA P Area.

3.3 Screening Assessment Summaries

These subsections summarize the results of the screening assessments, as detailed in Appendix D.

- 3.3.1 Human Health (must include screening levels)
- 3.3.2 Ecological (must include screening levels)

3.4 Ecological Assessment Summary

This subsection summarizes the results of the additional evaluation of ecological risk based on the screening assessment in the context of the Cañon de Valle studies. Must include uncertainty analysis.

3.5 Human Health Assessment Summary

This subsection discusses the need for a human health risk assessment based on the screening assessment results. Must include uncertainty analysis.

4.0 Conclusions and Recommendations

This section summarizes the conclusions regarding compliance with the clean closure performance standard, based on the information provided in the previous sections and associated appendices.

4.1 Interpretation of Risk

In this subsection, the conclusions of the risk assessments are interpreted.

4.2 Final Conclusions

This subsection provides a summary of the key elements of compliance with the clean closure performance standard.

4.3 Site Restoration

Future revegetation and site restoration activities are discussed briefly in this subsection.

5.0 Certifications

5.1 Certification of Accuracy

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5.2 Independent Professional Engineering Certification

6.0 References

List of Appendices

Appendix A PRS 16-016(c)-99 VCA Completion Report

Introduction

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Site Description

Previous Activities

Previous Investigations

Site Conceptual Model

Remedial Activities

Investigative and Remediation Activities

Data Review

Revised Site Conceptual Model

Site Assessments

Screening Assessments

Other Applicable Assessments

Conclusions and Recommendations

Waste Management

References

Appendix B Material Disposal Area P – Phase I Closure Implementation Report (MDA P, 387 Flash Pad, and PRS 16-016(c)-99)

Appendix C Bedrock Fracture Characterization at Material Disposal Area P: Phase II Closure Investigation (MDA P, 387 Flash Pad, and PRS 16-016(c)-99)

Appendix D Human Health and Ecological Risk Assessments for the MDA P Area (MDA P, 387 Flash Pad, and PRS 16-016(c)-99)

Introduction

Environmental Setting

Confirmation Data Analysis

Inorganic Chemical Comparison to Background

Radionuclide Comparison to Background/Fallout

Evaluation of Organic Chemicals

Conceptual Site Model

Site Screening Assessments

Human Health

Ecological

Ecological Risk Assessment for Cañon de Valle

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- Appendix E Confirmation Sample Database (consists of two parts: QA/QC summary and CD of sampling data) (Chemical Analytical Contract Laboratory Reports, including paper copies of chain-of-custody, should also be included in this Appendix. Laboratory data tables may be submitted in Microsoft Access or Excel format.)
- Appendix F Site Photographs (on CD)
- Appendix G Supporting Documentation Related to Variances