

TA16

Dhawan, Neelam, NMENV

From: Dhawan, Neelam, NMENV
Sent: Wednesday, March 21, 2007 1:43 PM
To: 'jmccann@lanl.gov'
Cc: Dave; katie
Subject: CDV IWP_TA-16 220 Complex Investigations

John,

We have received LANL's response to NMED's 'Approval with Modifications' for the IWP for Canon de Valle. The response seems adequate and we concur with the proposed submission dates for multiple investigation reports proposed in your response.

As I mentioned during our phone conversation, I reviewed the TA-16 220 complex D & D Demolition Completion Report that was provided with the response. I'm concerned with the 'Change Order Description' on page 8 of the report that states that berms that were saturated with motor oil were left in place because it would have created a hazardous waste stream and the removal and disposal would have added to the project cost. According to this report there were seven buildings at 220 complex where HE work was conducted and earthen berms were constructed next to the buildings as protection from direct accidental explosions. There is no mention of these berms in the IWP, and it is not clear whether these berms are still present or removed at some later date. Historically, samples were collected only in the footprint of the buildings.

LANL must locate these berms, remove them if they exist, and collect confirmatory samples, surface and at least at a depth of two feet at these locations and submit them for TPH (DRO [diesel range organics] extended) analysis. The IWP has not proposed any TPH analysis for samples to be collected at TA-16 220 complex.

If you have any questions or need any clarification, please call me at 476-6040.
Neelam

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