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FJF
MEMORANDUM

CONFIDENTIAL *Py*

TO: File?

THROUGH: Ronald Kern, Technical Compliance Program Manager

FROM: Teri Davis, Technical Compliance Program

DATE: May 8, 1995 *LANL*

SUBJECT: **Comments on LANL's April 13, 1995, Operable Unit 1093 Expedited Cleanup Plans**

VII

The expedited cleanup plan for SWMU 18-001(b) proposes to remediate by leaving in-place the sewer lines and manholes and decommissioning in-situ. The proposal is based on the low risk calculated and small volumes of COCs detected from phase I sampling results of the sediments and water found in the manholes and lagoons. The decommissioning will be accomplished by pouring concrete in the manholes and pipe-lines to immobilize remaining hazardous constituents within the SWMU. This proposal appears to be adequate given the results of phase I RFIW investigations; however, the following questions should be answered.

1. (2.2.3) Were the water samples from the manholes taken as filtered or none filtered for metals analysis?
2. (2.2.3) In the RFIW it was stated that if no water was found in the manholes then a groundwater sample would be collected by utilizing a hydropunch. The analytical results reported in Appendix A do not indicate that hydropunch data was collected. Is this data available?
3. (2.2.3) Is it correct to classify a material as RCRA D-listed hazardous waste based on concentration of a constituent? With regards the analytical results of MH-169, barium concentrations indicated from a sediment sample were at 9400 ppm. The expedited cleanup plan states, "of which barium (9400 ppm) may exceed the Toxicity, Characteristic, Leaching Procedure (TCLP) thus classifying the material as RCRA D-listed hazardous waste.
4. (3.5) Total dissolved solids results for wells PCO-3 and PCO-2 have been increasing over the years as noted in past ES reports. Recent data shows the results to be above drinking water standards. As the sewer-lines and lagoons are likely sources of contamination within this stretch of Pajarito Canyon, these results may suggest that past releases from these lines are impacting the shallow groundwater system. How will past releases from this unit be evaluated?

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