

TE 9/1/99 214-665-6660

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file LNL
OU 1092
VII

MEMO

TO: Barbara Driscoll

From: Benito J. Garcia

Date: 6/22/95

Subject: Comments on LANL's Expedited Cleanup Plans for OU 1093

Barbara, attached are Ron Kern's comments. My comments are as follow. Please use them as you maysee fit to do. As a general statement the proposal(s) seem to be acceptable from a regulatory perspective.

It is unclear as to whether or not the the Lagoons are included as part of the EC for SWMU 18-001. Based on the information provided it appears that the lagoons are not included and either should be addressed in this document or referenced to the appropriate documents.

This EC document seems to indicate that the lagoons may be considered for no further action based on screening levels that indicate that the lagoons were below LANL screening action levels. This implies that EPA has accepted the SAL as being equivalent or acceptable as the cleanup standard for these sites.

The EC document states that the SWMU site future use will be for industrial use. If this is acceptable for proposed cleanup levels proposed as SALs then a caveat should be added that if land use changes in the future that LANL needs to revisit the site to assure that the cleanup levels are adequate for the new land use, eg., residential use.

It is unclear as to the reasons for sampling of liquids for various constituents and excluding the sampling of those same constituents in sludges.

No clear indication as to the uranium sampling methodologies and the determinations of uranium concentrations and proposed stabilization of uranium in the SWMU.

The EC states that the UTL background levels were set for "selected" heavy metals. The criteria for the selection should be provided in the EC or the document which provides the sampling and analytical criteria.

There should be more specific information on the DOE approval process and an expected date of EC implementation if the EC is approved by the EPA. The vague language implies lack of coordination between LANL and the DOE.

Although not within the perview of the regulatory agency comment should be made on the superfluous use of supervisory personnel and the associated costs in implementing the EC. For example the need for the presence of the Geologist on site for the pouring of concrete is questionable. General cost statements and the high cost of acceptance inspectin should be explained.

SWMUs 48-002 a and b. There is no cost development plan and no specific timeline with DOE approval cited within the document.

Statement within the EC is that a sub-basement is a very

LANL HSWA 660 / PERMIT

good

TL



important potential pathway for contaminant migration. The EC should provide specifics on the migration pathways and possible exposures to individuals.

Section 2.2 cites previous site evaluations but no findings are cited.

Section 2.2.1 cites site inspections. Apparently these were just visual inspections and I fail to see the relevance of these visual inspections to the basis for the EC determination. This section also cites a previous report and no further action recommendation the report should be provided or at the very least be specifically cited and location for the regulator availability be included.

Section 2.2.2 cites a June 1993 breathing zone and soil vapor study but provides no data or results based on the study. This section should include specific locations of sampling events.

Statements as to Th-228 SALs and background need to be more specific. It is unclear as to how background levels were established and unclear as to how the SALs were established. Statements on no need for Th-228 remediation based on SALs needs to be justified.

Section 2.3 states that 220 cubic yards of soil will be generated in the EC process. There needs to be a discussion as to the proposed disposition of the LDR waste. There also needs to be more specific information on the proposed liquid waste to be generated.

Section 2.4.1.1 cites observations by Stellavato in 1993 but provides no specific information on locations of sampling events.

Section 2.4.3 cites identification of COCs but does not provide data on constituent concentrations. This section also proposes cleanup to occupational exposures. How does this compare to the SAL cleanup proposal at other SWMU locations. I assume that the OSHA standards would prevail in this scenario.

Sections 3.2 and 3.2.1 cite internal LANL and DOE permit and approval processes. Perhaps these are cited as obstacles to EC activities and LANL and DOE need to review these procedures.

Section 3.3 cites field screening techniques which are not specified within the EC but need to be provided or made available to the regulator.

SWMU 8-003 (a) septic tank EC for VOCs. The proposal is for stabilization of the tank with sand. Was the stabilization with concrete considered as an option and if considered why was it dismissed? If not considered, why not?

Section 2.2.2 discusses multimedia samples. More specific information should be provided on media sampling and specific results. This section also states that SALs are not applicable to sludge. The rationale for making this determination needs to be provided for regulator concurrence.

Section 2.3 states that stabilization will be determined by the disposal facility. The EC should indicate which facilities are being considered for this disposal.

Section 2.4.2 indicates future land use. Qualification to this statement should be added to include procedures to revisit the site for appropriate cleanup levels should land use be different from that proposed in the EC.

SWMU 6-007(f) surface disposal of lead and cesium-137. No

determination or mention as to whether or not this is a " mixed waste " stream. This evaluation needs to be made. If this is a mixed waste can LANL then propose on site disposal ?

The introduction states that the EC is based on " assumptions " which does not seem to be a valid basis for any cleanup activity. There should be some form of verification for proceeding with the EC.

Section 2.1 states that the disposal is only surficial. Has there been any sampling (random or otherwise) to verify that there is no burial of any waste at this site?

Section 2.4.2 cites the cleanup level for Cs-137 as 26 pCi/gm. How does this concentration compare to background levels of Cs-137 and how would this level be acceptable if land use were to change in the future? Are lead and cesium co-conataminants and need to be addressed together?

The allowability of on site disposal at LANL needs to be addressed and if found to be acceptable the seemingly high cost of the onsite disposal needs to be addressed.

Barbara, I hope these comments are of some value to you. If you have questions or just wish to discuss please call me at your convenience.