

interoffice

MEMORANDUM

to: Mr. Robert S. Dinwiddie, RCRA Permitting Facility Manager
from: Kim T. Hill, Environmental Engineer *KTH*
subject: Technical Review Comments
Interim Action Plan for Potential Release Sites 18-003(a-d, g)
Los Alamos National Laboratory (LANL)
May 1996
date: September 4, 1996

A technical review of the "Interim Action Plan for Potential Release Sites 18-003(a-d, g)" was performed. The review resulted in the attached comments (Attachment A). NMED HRMB should require LANL to clarify these comments by responding to either a Notice of Deficiency or a Request for Additional Information.

If you would like to discuss these comments further with me or would like to have an electronic copy of these comments, please let me know.



1503

cc: B. Hoditschek, file

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FILE LANL HSWA FU-2 on 1093 TA-18-003(a-d,g)

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TECHNICAL COMMENTS

Los Alamos National Laboratory (LANL)

"Interim Action Plan for Potential Release Sites 18-003(a-d, g)"

May 1996

1. Section 1.1, Release Potential/Health and Environmental Risks: The first paragraph states, "Floor drains in the TA-18 facility, which formerly drained to the septic tanks, have been sealed." Please clarify how the floor drains were sealed.
2. Section 2.2, Operational/Contamination History: The first paragraph states, "Because such discharge would reach the drainfield, water service to the building has been shut off and the catch tank's overflow line has been plugged. However, the concrete pit is open at the bottom, leaving a pathway to the soil for any leaks or spills from the tank." Please indicate how the overflow line was plugged and summarize the sampling methodology and analytical results of the concrete pit's characterization.
3. Section 3.0, Interim Action: The last paragraph states, "The outside surface of the catch tank at PRS 18-003(a) will be swiped to determine if alpha contamination is present indicating that an overflow may have occurred. In addition, the gravel bottom of the pit will be sampled for contamination." Please clarify how the gravel bottom of the pit was sampled and provide a table summarizing the analytical results.
4. Section 6.2, Second Paragraph: Please clarify which PRS at 18-003 will have both the liquid and sludge portions treated to meet RCRA Land Disposal Restriction treatment standards.
5. Section 6.2, Mixed Waste Treatment and Disposal: Table 6-2 indicates that wastes from PRS 18-003(a) will not receive RCRA treatment while the text seems to indicate otherwise. Please clarify.
6. Appendix A, Table A-1: Please clarify the columnar headings by providing an explanation or legend for the table. It is unclear what is meant by the columnar headings (ie., Preliminary Regulatory Status, TC Regulatory Levels, etc.) and acronyms.