

2/1093/18/18-003(a-d,g)

interoffice

MEMORANDUM

to: Ms. Teri D. Davis, LANL Facility Manager
from: Kim T. Hill, Environmental Engineer *KTH*
subject: Technical Review Comments
Interim Action Plan and Interim Action Report
Potential Release Sites 18-003 (a-d, g)
May 1996 and October 1996
Los Alamos National Laboratory NM0890010515
date: November 6, 1996

A technical review of both the "Interim Action Plan for Potential Release Sites 18-003(a-d, g)" (Plan) and the "Interim Action Report for TA-18, PRSs 18-003(a-d, g) Activities" (Report) was performed.

NMED HRMB should require LANL to respond to the comments in Attachments A and B of the attached Notice of Deficiency.

For clarification, this is the second internal submittal of the comments for the Plan; the first memorandum transmitting these comments was submitted on September 4, 1996 to Mr. Robert Dinwiddie, the former LANL Facility Manager. In recent discussions with you, it was decided to expedite the review of the Report and transmit both sets of comments to LANL as one comprehensive review.

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.

cc: LANL 96 File



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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

November 6, 1996

Mr. G. Thomas Todd
DOE/LAAO
538 35th Street
Los Alamos, New Mexico 87544

**RE: Notice of Deficiency
Interim Action Plan and Interim Action Report
TA-18, PRSs 18-003(a-d, g)
Los Alamos National Laboratory (NM0890010515)**

Dear Mr. Todd:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has reviewed the Department of Energy/Los Alamos National Laboratory's (DOE/LANL) Interim Action Plan and Report for Technical Area 18, PRSs 18-003(a-d, g) and found them to be deficient. NMED HRMB requires that DOE/LANL respond within thirty (30) days to the specific deficiencies in Attachments A and B.

Should you or your staff have any questions concerning this Notice of Deficiency, please contact myself or Ms. Teri D. Davis of my staff at 505/827-1558.

Sincerely,

Benito J. Garcia, Chief
Hazardous and Radioactive Materials Bureau

attachments

Mr. G. Thomas Todd
November 6, 1996
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cc: T. Davis, NMED HRMB
R. Dinwiddie, NMED HRMB
J. Jansen, LANL/ER Project, MS M992
E. Kelley, NMED SWQB
M. Leavitt, NMED GWQB
D. Neleigh, EPA, 6PD-N
T. Taylor, DOE LAAO, MS A316
J. Vozella, DOE LAAO, MS A316
N. Weber, NMED AIP, MS J993
S. Yanicak, NMED AIP, MS J993
LANL 96 File

ATTACHMENT A
Technical Comments

"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 (i.e., Preliminary Regulatory Status, TC Regulatory Levels, etc.) and acronyms.

ATTACHMENT B
Technical Comments

"Interim Action Report for TA-18, PRSs 18-003(a-d, g) Activities"
October 1996

1. Section 2.0, Interim Action: It is unclear if the decontamination waters were sampled after the triple-rinses. LANL shall clarify this issue and provide the analytical results from the decontamination water or other samples collected as part of the interim action.
2. Section 3.0, Monitoring and Confirmatory Sampling: LANL states, "The interiors of the tanks were considered clean..." because of the decontamination procedures. However, since no confirmatory samples were collected from the tanks and the decontamination water contained radionuclides and spent organic solvents (Section 5.1), LANL cannot provide reasonable assurances that the tanks were adequately decontaminated. LANL shall provide the rationale behind this assumption or sample the tanks to ensure proper decontamination.
3. Section 5.0, Waste Management: Final disposition of the wastes generated from this Interim Action has not been achieved. Many of the wastes still require analyses, and evaluation of treatment and disposal options. In short, this report does not provide a comprehensive narrative, but provides a status of on-going activities for the PRSs of concern. Once final dispositions have been achieved for the wastes generated as a result of this Interim Action, LANL shall provide NMED HRMB a complete report.
4. LANL does not provide an indication of the final actions to be conducted on the holding and septic tanks at these PRSs. LANL shall provide NMED HRMB with the anticipated future activities (i.e., removal, filling, etc.) for these tanks.