

LANL '07 TA-21
DP Aggregate Area

chamberlain, kathryn, NMENV

From: chamberlain, kathryn, NMENV
Sent: Monday, April 30, 2007 12:10 PM
To: 'Mark S. Thacker'
Cc: Cobrain, Dave, NMENV; Dhawan, Neelam, NMENV; 'Allan Chaloupka'; 'Bill Criswell'; 'Woodworth, Lance A.'; 'Kelly VanDerpoel'; 'Day, Emily'; duanep@lanl.gov; 'Roy Bohn'; 'Day, Emily'
Subject: RE: Follow-up to site visit 4/25/2007

Mark,

NMED concurs with the approach proposed by the Permittees.

- 1) The overburden/layback material may remain at the SWMU while awaiting analytical results. As noted by the Permittees, all storm water best management practices must be implemented.
- 2) The Permittees may utilize the nitrate and perchlorate data from samples collected at SWMUs where the 12 roll-off bins of overburden/layback material were generated to determine whether the material can be considered "clean" and utilized as backfill. As noted by the Permittees, perchlorate and nitrate will be included in the analytical suite for all verification samples of future overburden/layback material.
- 3) Due to the prohibition of open excavations at the Laboratory, the Permittees may utilize the material to backfill any of the DP Aggregate corrective action excavations; however, NMED recommends the Permittees document where the overburden/layback material originated.

Please let me know if you have any questions.

Thanks,
Katie

From: Mark S. Thacker [mailto:mthacker@lanl.gov]
Sent: Monday, April 30, 2007 11:35 AM
To: chamberlain, kathryn, NMENV
Cc: Cobrain, Dave, NMENV; Dhawan, Neelam, NMENV; 'Allan Chaloupka'; 'Bill Criswell'; 'Woodworth, Lance A.'; 'Kelly VanDerpoel'; 'Day, Emily'; duanep@lanl.gov; 'Roy Bohn'; 'Day, Emily'
Subject: RE: Follow-up to site visit 4/25/2007

Katie, per our conversation this morning we are requesting further clarification on the following points:

- "stockpiled" includes leaving the cuttings at the SWMU while awaiting analytical results. We will of course follow all appropriate storm water best management practices at each SWMU.
- To date we have approximately 12 roll-offs of overburden/layback soils that we have run waste characterization samples on (TAL metal, TCLP metals, gross alpha and beta, radionuclides (by gamma and alpha spectroscopy), isotopic plutonium, isotopic uranium, tritium, strontium-90, VOCs, SVOCs, PCBs, organic pesticides, organic herbicides, and cyanide) as required for TA-54 waste acceptance criteria (WAC). We did not request analyses of nitrate and perchlorate as they are not a requirement of the TA-54 WAC. We do have nitrate and perchlorate data from all of the samples collected from the SWMUs where the overburden/layback soils were generated. This data represents the worst case scenario because the samples were collected from under the structures that were excavated, not the overburden/layback material. We would like to utilize the "existing" nitrate and perchlorate data from the sampling at the sites where the currently "stockpiled" layback/overburden soils were generated to complete the evaluation of whether the material can be considered "clean" and utilized as backfill. When sampling future overburden/layback soils we will add nitrate and perchlorate to the analytical suite for the "verification" samples.
- Once the material is determined to be "clean" (i.e., meets residential cleanup standards as determined using NMEDs soil

screening guidance and, if applicable, meets LDRs), LANL will utilize this material to backfill DP Aggregate Corrective Action excavations being conducted throughout DP Mesa.

Thanks for taking the time to get back to us so quickly on these important matters.

Mark

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From: chamberlain, kathryn, NMENV [mailto:kathryn.chamberlain@state.nm.us]
Sent: Monday, April 30, 2007 7:23 AM
To: Mark S. Thacker; Roy Bohn; Day, Emily
Cc: Cobrain, Dave, NMENV; Dhawan, Neelam, NMENV
Subject: Follow-up to site visit 4/25/2007

Mark,

I wanted to get back to you on the issue of using the overburden material from each site as backfill. As we discussed, NMED concurs with your using the overburden material as backfill, provided that the following conditions are met;

- 1) The material must be stockpiled and characterized prior to its use as backfill
- 2) a "verification" sample must be obtained for every 50 cubic feet of soil.
- 3) The sample(s) must be analyzed for metals, VOCs, SVOCs, cyanide, nitrate, perchlorate, PCBs, and radionuclides.

If the analytical results determine the overburden material to be clean (i.e., meets residential cleanup standards as determined using NMEDs soil screening guidance and, if applicable, meets LDRs), it may be used to backfill the excavation. NMED recommends that conditions identified above be included in the Permittees' revised *Appendix C Investigation Derived Waste Plan*.

Please let us know if you have any questions.

Thanks,
Katie

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