



GARY E. JOHNSON
GOVERNOR

TA21
State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2044 A Galisteo Street
P.O. Box 26110
Santa Fe, New Mexico 87502-6110
Telephone (505) 827-1557
Fax (505) 827-1544
www.nmenv.state.nm.us



PETER MAGGIORE
SECRETARY

PAUL R. RITZMA
DEPUTY SECRETARY

February 21, 2001

Ms. Phebe Davol
TechLaw, Inc.
5675 West FM 487
Florence, Texas 76527

RE: STATEMENT OF WORK CLARIFICATION FOR REVIEW OF THE "DRAFT MESA-TOP MATERIAL DISPOSAL AREAS IMPLEMENTATION PLAN" FOR LOS ALAMOS NATIONAL LABORATORY NMED CONTRACT NUMBER 99/667.5000/0008

Dear Ms. Davol:

Meetings held in November 2000 between the Hazardous Waste Bureau (HWB), Los Alamos National Laboratory (LANL) and the U.S. Department of Energy (DOE) resulted in changes to, and clarification of, the statement of work for TechLaw Work Assignment Number Y513, Work Plan Phase 1B. At this time, HWB will not review the draft Mesa-Top Material Disposal Areas (MDA) Implementation Plan submitted by LANL. However, we want TechLaw to focus on the conceptual site model developed for the Implementation Plan. The conceptual site model in the Implementation Plan is represented as an 'interaction matrix' diagram. The 'matrix' is based on numerous supporting documents that I have enclosed for your review, in addition to the documents you received during our November 2000 meeting. Attachment A consists of a complete list of the documents enclosed with this letter.

The following tasks are needed:

1. Briefly review the conceptual model presented in Section 6.0 of the RCRA Facility Investigation (RFI) Report for MDAs, G, H and L at Technical Area 54 (enclosed). Review the conceptual site model 'matrix' in the Implementation Plan; specifically, review the selected supporting technical documents referenced in the 'interaction matrix' (see Attachment A for 'selected' list). Following review of these documents, please provide a brief summary of each article. In addition, provide your comments on any useful and accurate information, technical deficiencies, data gaps and any significant issues LANL has not adequately addressed in these documents. Identify whether the conceptual model adequately addresses all receptor pathways. Identify inadequate data, rationale and reasoning

ASWA LANL 05/11/01

TL



Ms. Davol
February 21, 2001
Page 2 of 2

for assumptions made in the conceptual model, e.g., limited fracture flow, fate and transport of contaminants (including radionuclides) in dry mesa settings, etc. If, in review of the model you encounter any questions regarding the specific modeling inputs and parameters, please contact me for additional information to continue your review.

2. Provide information to assist HWB with selecting and evaluating remediation options for MDAs. Conduct a review to summarize any available methods to remediate radionuclides, metals and perchlorate in soil, groundwater, and perched groundwater. For each method, briefly summarize the remediation technology and describe its limitations, noting their advantages and disadvantages or shortcomings. In addition, provide tables evaluating the capabilities and limitations of available radionuclide field screening instruments, field screening methods and EPA laboratory test methods for radionuclides. Note whether the survey was conducted via a paper search or (preferably) based on professional judgement and experience.

Also, please provide any comments that TechLaw may have prepared on the draft Implementation Plan for our November 2000 meeting. If comments were not prepared, there is no need to provide any at this time.

If you have any questions regarding this letter, please contact me at (505) 827-1558 extension 1048.

Sincerely,



Eliza A. Frank
LANL Corrective Action Section
Permits Management Program

cc w/o enclosures:

P. Allen, NMED HWB
J. Bearzi, NMED HWB
N. Dhawan, NMED HWB
J. Young, NMED HWB
J. Dreith, TechLaw, Inc.

File: Reading and HSWA LANL 5/1148/54