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GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
**DOE OVERSIGHT BUREAU**  
P.O. Box 1663, MS/J-993  
Los Alamos, New Mexico 87545

MARK E. WEIDLER  
SECRETARY

EDGAR T. THORNTON, III  
DEPUTY SECRETARY

**MEMORANDUM**

TO: Benito J. Garcia, Chief HRMB

FROM: Steve Yanicak, NMED DOE OB Site POC

DATE: July 19, 1995

SUBJECT: NMED DOE Oversight comments on **Expedited Cleanup plan for Solid Waste Management Unit 22-15(c), Field Unit 5.**

The DOE Oversight Bureau (DOE OB) has reviewed the subject document. The following technical comments are provided for the purpose of communicating the results of the review by the DOE Oversight Staff. The comments are not provided or intended for the purpose of representing the regulatory position of the New Mexico Environment Department.

**Comments**

1. Page 3, Section 2.1.2 Physical Setting  
"The upper part of the drainage from the outfall to the former pond overflow area contains the deepest soil profile, with an approximate depth of 30 inches. Downstream of the former pond area, soils are six inches deep or less and have outcrops of the Tshirege Member of the Bandelier Tuff exposed at eroded areas in the channel."

LANL should discuss the soil/tuff interface. Is the tuff faulted? Have the COC's migrated through the faults? What is the contingency plan if faults are visible during or after soil excavation?

2. Page 11, Section 2.4.3 LANL states that "With this approach, the residual risk remaining at the site following remediation will be within the EPA acceptance risk range of 1E-4 to 1E-6 for carcinogens, and less than a Hazard Index of 1 for noncarcinogens."

It is understood by the DOE OB staff that LANL should



calculate cleanup levels of carcinogens for three levels of risk (1E-4, 1E-5, 1E-6).

3. Page 23, Section 6.0 Annexes This list of annexes includes Section 6.13 Verification Sample Locations. Section 6.13 includes the calculation for the number of verification samples but does not include the locations.

LANL should supply a site map indicating the locations of verification samples.

Reviewed by: Chris Hanlon-Meyer

SY:CJHM:cjhm

cc: Neil Weber, Chief, NMED DOE Oversight Bureau  
Barbara Driscoll, US EPA Region 6  
Cheryl Rofer, LANL FU 5 Field Project Leader MS D462  
Ivan Trujillo, US DOE LAAO AIP POC MS A316  
Mike Gilgosch, US DOE FPC Field Unit 5 MS A316  
Tracy Glatzmaier, LANL ER Project MS M992  
Teri Davis, NMED HRMB  
Glenn Saums, NMED SWQB  
Dennis McQuillan, NMED GWPRB  
Cecilia Williams, NMED AQB  
File LANL HSWA  
File Look