

7-33

MEMORANDUM

TO: FILE

FROM: Eliza Frank *EF*

DATE: April 18, 2002

Subject: DELAY OF VOLUNTARY CORRECTIVE ACTION PLAN (VCA)
APPROVAL FOR POTENTIAL RELEASE SITES (PRS) 33-007(b), 33-010(c)
and C-33-003

LANL submitted the VCA plan for TA-33, PRS 33-007(b), 33-010(c) and AOC C-33-003 in April 1999. The VCA proceeded at risk during the spring of 1999 with verbal approval from HWB; however HWB had not thoroughly reviewed the plan. HWB noted that the nature and extent of hazardous waste contamination must be defined before use of the Segmented Gate System (SGS) because the sorter will mix all the soil at the sites. HWB reviewed the plan and sent a request for supplemental information (RSI) in November 1999.

LANL provided a response to the RSI in April 2000. The response also included a "Segmented Gate System Voluntary Corrective Action Status Report (for field activities) for PRSs 33-007(b), 33-010(c) and C-33-003" to document work completed at these sites. The response and status reports summarize activities undertaken in 1999 and recognize that additional sampling is needed. A primary issue is that confirmation sampling conducted after use of the SGS revealed a potential increasing trend in metal concentrations around the site. The concentrations of metals were greater than ecological risk screening levels.

In the future HWB anticipates that LANL will submit an additional work plan to resolve this issue at these sites. The sampling has been deferred until the TA 33 aggregate sampling. As per verbal communications in February 2000, this memo is a record of receipt of the status report and the agreement between HWB and LANL that further work is needed at these sites before LANL may request NFA. This VCA did not result in a final remedy for these sites.

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