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M E M O R A N D U M

TO: Benito J. Garcia, Chief, HRMB
FROM: Steve Yanicak, NMED DOE OB Site POC
DATE: August 7, 1995
SUBJECT: NMED DOE OB Review of Expedited Cleanup Plan for
PRS 36-003(a)

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

SWMU 36-003(a) consists of an inactive septic tank, drainfield, and seepage pit. Results of the RCRA Facility Investigation Workplan (RFIW) sampling effort indicate the septic tank contains elevated levels of barium, cadmium, lead, mercury, and silver. Levels of contaminants in the drainfield were below SALs where sampled and therefore the seepage pit was not sampled. Remediation plans consist of removing the contaminated contents of the septic tank, washing, and subsequent filling of the tank with concrete.

After review of this document, our concerns and recommendations are as follows:

1. The floor of the septic tank should be inspected for possible cracks after the contents have been removed and the tank cleaned. If breaches are found, samples should be taken beneath these cracks. If the floor is intact, the planned remediation of the septic tank meets with our approval.
2. The sampling locations shown in Figure 2-2 are of some concern. The sampling plan shown in Figure 2-2 (Pg 5) shows that no samples were taken where the leachfield pipes discharge into the seepage pit. Since this system has been in operation since 1949, (RFIW for OU 1130; 5.3.1.1, P4, Pg 5-22) it is possible that some of the perforations have been blocked by sediment and/or other solids. Samples should be taken where these pipes discharge into the seepage pit.



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If there are any questions, please contact me or John W. Garvey
(672-3151).

Reviewed by: John W. Garvey 

SY:jg

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