

MEMORANDUM

To: Herb Grover, RCRA Permit Supervisor

Through: Bruce Swanton, RCRA Technical Program Manager

From: Danny Katzman, RCRA Technical Program

Date: June 3, 1992

Re: Comments on "Proposed Actions, Transuranic Waste Storage Pads 1, 2, and 4, TA-54, Area G, Los Alamos National Laboratory"

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These comments refer to our review of LANLs proposed remediation plan for exhumation of buried mixed waste drums at TA-54, Area G.

- concerning distinction between detection of "releases from the containers" and "normal off-gassing of the soil under the pads"... Is LANL referring to off-gassing of the underlying organic vapor plume when referring to "normal off-gassing"?
- Is there a continuous air-monitoring system set up to monitor the organic vapor plume?
- bullet 1 of the Assessment Plan requirements... I thought that this had already been done?
- Why commit to a long-term study in the early phase? Why not purchase an appropriate pre-fab building, set it up, and begin removal of drums immediately after initiating a NEPA Environmental Assessment if necessary. We don't understand why are the exotic building design necessary?
- Given that some of the drums that are corroding have been buried for only 6 years, the proposed schedule seems slow and could result in corrosion of a large percentage of the drums since removal will proceed into 1997.
- If domes are constructed over the pads, there could be a collection of organic vapors that might seep from the subsurface. Venting of the domes would be a suggestion.

cc: Ed Horst, RCRA Program Manager



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