HSWA LANL 9/1148/54

ENVIRONMENTAL RESTORATION PROJECT COMMUNICATION RECORD

Date: 11/28/00	**Time:** 1:30 pm	**Recorded By:** P. Bertino
To: Neelam Dhawan ND	**From:** P. Bertino PB	**Telephone No.:** 665-2198

Affiliation: NMED-HWB

Other Parties:
John Hopkins (LANL ER) and Woody Woodworth (DOE-AL)

Discussion:
This communication record documents comments received during a meeting with Neelam Dhawan, NMED-HWB, Woody Woodworth, DOE-AL and myself on November 8, 2000, regarding the Voluntary Corrective Action (VCA) Plan for Potential Release Site (PRS) 54-007(c)-99 (LA-UR-00-3905). During the meeting, it was agreed that LANL would document NMED-HWB's comments and LANL's response to each comment and provide the requested information to NMED-HWB with this communication record. Each NMED-HWB comment was discussed, resolution of each comment is summarized below.

Specific Comments:

1. NMED-HWB requested that LANL add two additional sample locations, one in the middle of each septic tank drain field. Additionally, NMED-HWB suggested that to ensure nature and extent is adequately defined, LANL collect drain field samples from two depth intervals that were not specified. LANL agreed to both requests and is providing a revised Figure 4.2-1 from the VCA Plan with this record. The nominal depth of each drain field is 4 feet below ground surface (bgs). LANL is proposing to collect one sample from the 5-6' interval (as specified by John Young to John Hopkins) and one sample from the 7-8' interval from all 12 sample locations identified on revised Figure 4.2-1. All 12 samples will be field screened for radioactivity and volatile organic compounds (VOCs) and will be submitted for fixed laboratory analyses. The revised figure and description of sample collection intervals will be discussed in the VCA completion report. 24
2. NMED-HWB requested that LANL clarify that obvious areas of stained soil/tuff beneath either septic tank will be field screened and the soil removed and stock-piled on site if field screening instruments indicate unacceptable levels and/or refusal is reached (i.e., impermeable tuff).
3. Since LANL proposed to base the confirmatory sampling analytical suite on septic tank waste characterization results, NMED-HWB requested that LANL provide the waste characterization results and corresponding analytical methods. LANL agreed and has included the results and analytical methods with this communication record and will present them again in the VCA completion report.
4. Since the elevated gross beta levels cannot be attributed to a specific source, NMED-HWB requested that LANL add strontium-90 to the analytical suite for the confirmatory samples. LANL agreed and will report these analytical results in the VCA completion report.
5. NMED-HWB asked for a more thorough description of the risk assessment approach discussed on page 5 of the VCA Plan. LANL agreed and the following is a summary of the risk assessment approach for the VCA. Additionally, LANL will discuss analytical results from the confirmatory sampling and the risk assessment approach to be applied with NMED-HWB prior to preparation of the VCA completion report.

   After comparing analytical results to Laboratory background values, resulting contaminants of potential concern (COPCs) will be compared to human health preliminary remediation goals (PRGs) based on individual exposure scenarios. As described in the VCA Plan, cleanup levels that are protective of human health will be based on EPA Region 6 industrial PRGs due to the current and planned future industrial land use of both sites. Cleanup levels protective of ecological receptors and the ecosystems they represent will be derived using information from the ecological scoping process, which identifies chemicals of potential ecological concern (COPECs) and potential complete exposure pathways, and an ERA, if warranted. The scoping process and the screening ERA will be prepared in accordance with ERA guidance developed specifically for the Laboratory (Kelly et al. 1998, 57916).

Action Items:
Hand-deliver communication record for Neelam Dhawan to initial and provide revised drain field sampling location map, waste characterization results and corresponding analytical methods with record. Where indicated above, ensure NMED-HWB comments are adequately addressed in VCA completion report.

NMED-HWB will grant NFAs for sites that pose acceptable risk for based on residential scenario. ND

TV

11643

Subject: Phase 1A Work Plan
Date: Mon, 20 Nov 2000 10:40:37 -0700
From: "Dreith, June" <JDreith@TechLawInc.com>
To: "'eliza_frank@nmenv.state.nm.us'" <eliza_frank@nmenv.state.nm.us>
CC: "'john_kieling@nmenv.state.nm.us'" <john_kieling@nmenv.state.nm.us>, "'cindy_abeyta@nmenv.state.nm.us'" <cindy_abeyta@nmenv.state.nm.us>, "'neelam_dhawam@nmenv.state.nm.us'" <neelam_dhawam@nmenv.state.nm.us>

HBWA LANL 5/1148/574

This e-mail is being sent to clarify the phase 1A Work Plan for the Mesa-Top Material Disposal Areas Implementation Plan. This work plan should be corrected to included the review of one technical document, the "Mesa-Top Material Disposal Implementation Plan" and any associated attachments.

The November 15, 2000 work plan indicated that two technical documents were to be reviewed.

I hope this e-mail will act as a clarification letter to the work plan. If any additional information is necessary please let me know.

Sincerely,

June K. Dreith