TO: File
FROM: Eliza Frank and Neelam Dhawan
DATE: March 28, 2001
SUBJECT: Current status of the MDA HPT

The Hazardous Waste Bureau (HWB) received the RCRA Facility Investigation (RFI) Report for Material Disposal Areas (MDAs) G, H and L at Technical Area (TA) 54 submitted by Los Alamos National Laboratory (LANL) in March 2000 (referenced by ER19990003 and LA-UR-00-1140). The MDA High Performing Team (HPT) was formed in January 2000 to work on the TA 54 RFI Report and develop a MDA core document that would streamline remediation for a group of MDAs. The HPT consists of staff from HWB, LANL and the Department of Energy (DOE). Initially, the HPT met numerous times on formatting issues for the RFI report. In addition, the MDA core document evolved into the *Draft Mesa-Top MDA Implementation Plan* which LANL wrote and submitted with a cover letter dated August 31, 2000 (referenced by ER2000-0469). HWB expressed reservations about the content of the *Draft Implementation Plan*. Then, due to a change in direction from senior management, the HPT agreed that it would not review the *Draft Implementation Plan* at this time. The *Implementation Plan* is outside the current, more focused scope of the MDA HPT.

In September 2000, the HPT received direction from the senior management of NMED, LANL and DOE to expedite the implementation of a preferred remedy at one MDA. The HPT selected MDA H and narrowed the scope of its effort to accommodate the change in focus. The HPT agreed that HWB would not continue its review of the RFI Report for MDAs G, H and L at TA 54. The reporting of the RFI for MDA H will be separated from the RFI for MDAs G and L in order to expedite the implementation of a preferred remedy at MDA H. HWB has reviewed the draft RFI for MDA H. LANL will submit a revised RFI report during April 2000 that addresses only MDA H and any comments and concerns raised to date by HWB. The revised RFI Report for MDAs G and L will be submitted at a later date. HWB anticipates sending approval of the RFI for MDA H during May and will attach a record of communication that summarizes the comments and responses exchanged between HWB and LANL during review of the draft RFI.

Currently, only eight of the nine shafts at MDA H are on the Hazardous and Solid Waste Amendments (HSWA) module of the permit; however, all nine disposal shafts will be addressed under corrective action as per 20.4.1.500 NMAC (incorporating 40 CFR 264.101). The HPT agreed to conduct a Corrective Measures Study (CMS) at MDA H. A CMS is needed because contaminants at the site may present a threat to human health and the environment over the lifetime of the waste. HWB sent a CMS notification letter to LANL and DOE on December 27, 2000. The CMS Plan for MDA H shall be submitted to HWB by March 30, 2001.

Upon reviewing the draft MDA H RFI report, HWB identified data gaps documenting the presence or absence of contaminants in air, groundwater, surface soils/sediments and VOCs in the subsurface at MDA H. Therefore, the following will be conducted to address the remaining data gaps and fully characterize the lateral and vertical extent of contaminant releases and bolster impact assessments, while addressing preliminary address data needs for the CMS:

- Collection of additional subsurface samples to further define the lateral extent of tritium and organic chemical contamination from borehole 54-1023 and from new boreholes to be drilled. Sample collection at 54-1023 was initiated in March. Drilling of new boreholes will be initiated during the summer 2001.
- Installation of an air monitoring station adjacent to MDA H to monitor for tritium in air.
- Collection of a sediment sample near previous sample location 54-5132, at the interface between the alluvial sediments and bedrock to collect data where site sediment has likely accumulated over the years.
- Evaluation and incorporation of groundwater data from the unsaturated zone monitoring at MDA G, the regional saturated zone at R-22, and the ongoing TA-54 groundwater investigation into the CMS for MDA H as they become available.

HWB agreed that the further investigation of the site to fill remaining data gaps could be completed as part of the CMS. The MDA H CMS will evaluate corrective action alternatives and assess the need for and design features of alternative remedies to reduce potential future adverse impacts from hazardous wastes and radionuclides buried in the subsurface. The range of alternatives to be identified and evaluated includes excavation and removal, stabilization, capping and/or in-place containment and no action. Upon completion of the CMS, one or more of the alternatives will be recommended for implementation.

MDA H CMS Milestones

8/9/00	Long term site monitoring brainstorming session at Los Alamos
1/15/01	Identified alternative remedies to be evaluated for MDA H CMS
1/31/01	Draft Public Involvement Plan (discussed with CAB 3/12 01)
2/6/01	Corrective action objectives for MDA H identified and more or less agreed to
2/01, 3/01	HPT discussions with Pueblos, and NNCAB
3/1/01	Public outreach initiated with CAB, Pueblos, and availability sessions
3/30/01	CMS Plan complete and to HWB
4/17/01	Technical brainstorming session in Los Alamos to discuss excavation alternatives
6/__/01	Public workshop on remediation alternatives
6/30/01	Alternatives assessment for MDA H remedies completed and documented
8/30/01	Preferred remedy selection
11/30/01	Technical peer review of MDA H CMS Report initiated
1/30/02	Technical peer review of MDA H CMS Report completed
4/30/02	Core team and legal review of MDA H CMS Report initiated
7/1/02	Public Comment notices issued
8/1/02	Public comment period initiated
10/1/02	Public comment period completed
12/20/02	Public comments incorporated into final MDA H CMS Report
1/03	Initiate implementation of a remedy at MDA H (and other applicable MDAs)