TA 54

Kieling, John, NMENV

From: Scott Kovac [scott@nukewatch.org]
Sent: Monday, February 04, 2008 4:58 PM
To: Kieling, John, NMENV
Subject: NWNM MDA H Comments

Attachments: MDA H Comments 2-5-08.doc

MDA H Comments 2-5-08.doc (35 ...

John,
Our MDA H comments are attached.

Thank you,
Scott Kovac
Operations and Research Director

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Reference: LANL MDA H Remedy Selection (SWMU 54-004)

Nuclear Watch New Mexico respectfully submits these comments for MDA H Remedy Selection at Los Alamos National Laboratory (LANL).

The Hazardous Waste Bureau of the New Mexico Environment Department (NMED) has selected a combination of engineered ET cover and total encapsulation of the shafts and soil-vapor extraction.

We feel that your decision for the remedy selected now may be premature due to unknowns concerning MDA H. As your fact sheet states, the Permittees have not sampled soil gas at depths greater than approximately 250 feet below the ground surface. The vapor-phase transport of VOCs beneath MDA H is complex and has not been fully evaluated by the Permittees. In addition, the groundwater monitoring wells installed by the Permittees in the vicinity of MDA H (including R-20, R-22, R-32, and R-16) cannot provide reliable data to evaluate whether or not VOCs released from TA-54 have reached the regional aquifer. The waste inventory at MDA H is incomplete. If all these unknowns were known, then NMED's selection may make sense.

As it stands now, Nuke Watch disagrees with the proposed remedy selected by NMED, and requests that NMED select removal of the wastes. We also request that this selection not set precedence for future selections. Alternatively, we argue that the fullest possible characterization be achieved and then a remedy selected.

NMED stated that the total cost of the encapsulation is comparatively moderate compared to removal and mentions that the cost for installation and operation of the SVE and soil-gas venting will be very low. Cost must not be a significant factor when choosing a remedy.

Transportation was given as another reason for NMED's selection. The fact sheet states that the waste would have to be transported through Los Alamos County and surrounding communities enroute to a disposal site, resulting in increased potential for transport related accidents and associated exposure to human and ecological receptors. We believe that NMED should reference a study or look at WIPP transportation data instead of making a general statement such as this. Why is it presumed that waste can't be shipped from MDA H when WIPP shipments frequently occur?

Respectfully,

Scott Kovac
Nuclear Watch New Mexico