



TA-73



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March 16, 2006

Mr. David Cobrain
State of New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303



Reference: Work Assignment No. 06110.270.0003; State of New Mexico Environment Department, Santa Fe, New Mexico; General Permit Support Contract; Technical Review of the February 28, 2006 Revisions to the Remedy Design Work Plan For The Los Alamos Site Office TA-73 Airport Landfill, Revision 1, Dated June 2005; Los Alamos National Laboratory, Los Alamos, New Mexico; Draft Deliverable

Dear Mr. Cobrain:

Enclosed please find the deliverable for the above-referenced work assignment. The deliverable consists of a technical review of the February 2006 revisions to the "Remedy Design Work Plan for the Los Alamos Site Office (LASO) TA-73 Airport Landfill, Revision 1," dated June 2005.

In general, revisions to the Remedy Design Work Plan, Revision 1 (RDWP) appear to adequately address most of the NMED January 4, 2006 NOD comments. Any unresolved issues are identified in the attached deliverable.

It must be noted that the revisions to the RDWP stipulate provisions of the following in the near future and NMED may wish to establish schedules and lines of reporting for these submittals. In their responses to NMED comments regarding design deficiencies, DOE-LASO indicate that NMED will be provided with the designs for their review and approval prior to construction and that DOE-LASO and NMED will need to agree upon a schedule for this review and approval to ensure that construction can be completed in the 2006 field season.

- Construction Quality Control Plan for the MatCon Cover, including procedures for coring and testing.
- Operation and maintenance of the MatCon cover. For example, Section 3.1.5 of the Post-closure Care and Monitoring Plan (PCMP) indicates that the owner/operator will be required to make monthly inspections and submit the results to the MatCon subcontractor and to the PE, and that MatCon subcontractor representatives will make annual inspections and evaluations for the first five years. It is recommended that NMED seek clarifications on whether the monthly inspection reports will also be submitted to NMED

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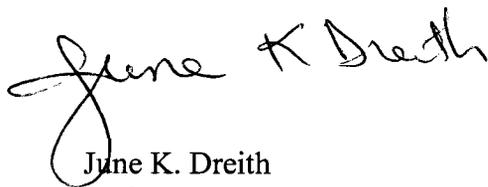
and who will inspect the cover after the first five years. Since the MatCon cover will be used for aircraft maintenance or storage, the monthly inspection may need to be maintained for the life of the post-closure period.

- The final design for the MatCon cover.
- The final design for the retaining walls.
- The final design for the hangar pads.

The document is formatted in Microsoft Word. The deliverable was emailed to Mr. David Cobrain on March 16, 2006 at David.Cobrain@state.nm.us and Ms. Darlene Goering at Darlene.Goering@state.nm.us. A formalized hard (paper) copy of this deliverable will be sent vial mail in a few days.

Please feel free to contact me at (303) 763-7188, or Mr. Mohamed Nur, the reviewer, at (703) 818-3244, if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "June K Dreith". The signature is written in a cursive style with a large, looping initial "J".

June K. Dreith
Project Manager

Enclosures

Cc. D. Goering, NMED
M. Nur, TechLaw
G. Starkebaum, TechLaw
Denver Files

**Los Alamos National Laboratories
Los Alamos, New Mexico**

**Technical Review of the February 28, 2006 Revisions to the
Remedy Design Work Plan
For The Los Alamos Site Office TA-73 Airport Landfill
Revision 1, dated June 2005**

Submitted to:

**Mr. David Cobrain and
Ms. Darlene Goering
State of New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505**

Submitted by:

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**Work Assignment No.
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Darlene Goering
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March 16, 2006

**Technical Review of the February 28, 2006 Revisions to the
Remedy Design Work Plan
For The Los Alamos Site Office TA-73 Airport Landfill
Revision 1, dated June 2005
Los Alamos National Laboratory (LANL), New Mexico**

COMMENTS

1. It appears that most of the NMED January 4, 2006 NOD comments have been technically adequately addressed. However, LANL should ensure that in the final Remedy Design Work Plan (RDWP) document any inconsistencies between the various sections of the document will be removed. Inconsistencies may result due to the design changes which may not have been adequately reflected in all the sections of the RDWP. For example, for the north and east slopes of the landfill, the revised design calls for an infiltration layer incorporating a double sided drainage composite layer. According to the engineering drawings (e.g., Drawing 2025) and the Construction Plan (Attachment B), this layer will be installed after the first six inches of the infiltration layer has been installed. However, Section 6.6 of the Construction Quality Control Plan (Attachment C) indicates that the infiltration layer will be constructed with two nominal 9-inch lifts and compacted. These two construction procedures are inconsistent and the CQCP does not even acknowledge the new design requirement of incorporating a double sided drainage composite within the infiltration layer.
2. Response to NMED General Comment 4 notes information (e.g., the types of aircrafts used and their weights, weight distributions when the planes are parked on the hangar slabs, etc.) which is not provided in the text of the design basis. The response also indicated that calculations will be rechecked to ensure that the effect of the concrete, hangars, aircraft, and MatCon have been taken into consideration. Please incorporate the information provided in the response into the RDWP design basis text and ensure settlement calculations have been rechecked.
3. The response to NMED General Comment 7 is inadequate. Section G as indicated on Drawing 2002 shows the interface between the MatCon cover and the existing paved taxiway. The detail shown in G indicates a sloped cover having riprap and geotextile components abutting the MatCon cover. This detail appears applicable to the entire length of the southern edge of the MatCon cover east of Section C. NMED's concern with the detail shown in Section G is the potential for runoff water to pool or run along the interface and infiltrate through the MatCon cover aggregate base course. Clarify the design features that will remedy this concern. In addition, Note #5 which is added to Drawing 2005 does not address the comment regarding the lack of clarity on the extent of final cover and waste. Drawing 2002 should be revised to clearly show the limit of final cover and extent of waste under the cover.

4. Response to NMED Specific Comment 5 is not incorporated in the design basis text. Please incorporate the response in the text of the RDWP, and also in the technical specification since it is stated “impacts of any elastic settlement that may occur would be addressed while placing the fill material.”