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TO: James Bearzi, Chief HWB

FROM: Vickie Maranville, HWB Airport Landfill Project Manager ^{WM}

THROUGH: John Kieling, Program Manager ^{JK}
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Cc: LANL TA-~~73~~ file

DATE: February 18, 2003

SUBJECT: Airport Landfill SWMU 73-001(a) Drainage Debris Removal Non-Compliance Summary

The following is a summary of project history and correspondence regarding the drainage debris removal activities for solid waste management unit (SWMU) 73-001(a) commonly known as the Airport Landfill drainage debris removal project.

- In December of 1999 Airport Landfill High Performing Team (HPT) formed.
- In May 2001 the HPT prepared and reviewed a draft IM Plan for drainage debris removal using a combination of manual and helicopter removal.
- In the summer of 2001 DOE HPT representative changed.
- In the fall of 2001 the new DOE representative requested additional time to evaluate whether the benefit of removing the debris outweighed the risk to workers associated with removal.
- On September 26, 2001 NMED, LANL, and DOE visited the site to discuss removal options. As a result of the site tour NMED sent a letter to EPA requesting concurrence with removal strategy developed during the site tour. (NMED Correspondence dated October 3, 2001).



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- April 16, 2002 EPA concurs with NMED proposed cleanup approach.
- May 8, 2002 NMED required the Permittees to submit an IM Plan by June 3, 2002.
- Permittees miss deadline, request an extension after the deadline, and submit IM Plan on July 18, 2002.
- July 24, 2002 NMED rejects IM Plan due to technical incompleteness. In the letter, NMED states the plan lacks detail and outlines the required elements for the revised plan.
- August 4, 2002 NMED once again explains level of detail expected in a revised plan due August 7, 2002. (E-mail to Permittees copy in NMED Administrative Record)
- IM Plan submitted on August 7, 2002 is similarly inadequate as the previous version: it does not select a remedy or contain elements outlined in the July 24, 2002 letter from NMED.
- NMED discussed deficiencies with the Permittees on several occasions in September 2002. (Documented in January 6, 2003 email summary to DOE, also part of the NMED Administrative Record).
- November 6, 2002 NMED sent formal correspondence notifying DOE that the IM Plan once again lacks detail; however, NMED agrees to hold comment on the IM Plan until DOE submits an addendum to the IM Plan (due to NMED on December 31, 2002).
- December 31, 2002 DOE requests additional time to submit Addendum to IM Plan.
- January 29, 2003 NMED correspondence to the Permittees outlining project history and again stating what is required in the IM Plan Addendum submittal.
- February 11, 2003 NMED sent a letter outlining a regulatory deliverable schedule to the Permittees. The letter also states that the Addendum to the IM Plan must be complete and detailed, outlining the methods for implementing the remedy.
- February 14, 2003 DOE submits a 2-page addendum to the IM Plan. Once again the submittal is incomplete, lacks detail, and proposes a schedule that is different from the schedule set by NMED. The most recent submittal also does not contain the necessary information for NMED to determine if the proposed remedies will be able

to achieve the desired results. In addition, the submittal lacks detail to determine if the selected remedy will create adverse impacts to the environment (I.e., installation of a tower) and how erosion or other impacts created during implementation of the proposed remedy will be managed.