

TA-73 SWMU 73-001(a)
 AIRPORT LANDFILL Drainage
 INFORMAL IM COMMENTS

Subject: Airport Landfill

Date: Tue, 15 Jul 2003 16:21:46 -0600

From: Vickie Maranville <vickie_maranville@nmenv.state.nm.us>

To: twhitacre@doeal.gov, Terry Rust <trust@lanl.gov>, David Cobrain <david_cobrain@nmenv.state.nm.us>

The following is a summary of the meeting held today at the HWB office in Santa Fe between myself (Vickie Maranville, NMED), Tom Whitacre (DOE), and Terry Rust (LANL RRES).

NMED does not want to delay implementation of scheduled debris removal activities planned for the Airport Landfill drainage debris disposal areas [SWMU 73-001(a)]. NMED encourages DOE to begin preparation activities for the required debris removal action immediately. Based on information provided by DOE the proposed schedule for debris removal activities is: site preparation July 31, 2003; field activities (removal action) to begin August 4, 2003.

During our meeting NMED discussed comments on the IM Plan for SWMU 73-001(a) and a plan for responding to the comments. Attached is a copy of NMED comments in draft form. Many of the comments request additional information regarding proposed removal activities. DOE has agreed to provide additional information to satisfy the attached comments to NMED. NMED has agreed to allow some of the comments to be addressed in the IM Report. I have indicated within the text of the attached comments which comments need to be addressed in the form of additional information and those that can be addressed in the IM Report. If DOE can provide information to support the administrative record to NMED by August 1, 2003 (in the form of a record of communication, e-mail, or other documentation from the contractor), NMED will not issue formal comments in the form of an Notice of Deficiency to DOE for the Airport Landfill IM Plan. Once the additional information (see attachment) is provided, NMED will make a final determination on the IM Plan.

NMED would like to point out that the technical approach is not in dispute rather additional information is required to support the selected remedy. Please feel free to contact me at 428-2546 if you have any questions. Additional information can be faxed to 428-2567 and should contain a cover letter explaining the information contained in the submittal. In addition, clarification to specific issues can be sent to vickie_maranville@nmenv.state.nm.us in the form of a record of communication.

Thank you for meeting with me.

Sincerely, Vickie Maranville

 informal im comments july.doc	Name: informal im comments july.doc Type: WINWORD File (application/msword) Encoding: base64
---	---



4898

The New Mexico Environment Department (NMED) has reviewed the Department of Energy's (DOE) document entitled "Interim Measures Plan for Potential Release Site 73-001(a) Debris Removal" dated June 13, 2003, and is providing the following informal comments. The bold text at the end of each comment indicates the action required to satisfy each comment.

ATTACHEMENT

General Comments

1. The Interim Measures (IM) Plan contains numerous typographical, grammatical and formatting errors. Correct and revise typographical, grammatical and formatting errors and submit a revised IM Plan. **No response needed at this time.**
2. The IM Plan refers to the Airport Landfill as a potential release site. The Airport landfill is a solid waste management unit (SWMU) currently undergoing Resource Conservation and Recovery Act (RCRA) corrective action. Revise the text of the IM Plan to accurately reflect the drainages as a SWMU. Although debris in a watercourse is a violation of New Mexico Water Quality Control Commission Regulation 20 NMAC 6.2 §2201, 40 C.F.R 122.26 and the U.S. Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) storm water multi-sector general permit, and so is a regulatory driver for removal of the debris, debris removal is also being conducted to satisfy the RCRA corrective action activities conducted at the Airport Landfill SWMUs. Correct the text to accurately state that activities are being conducted at the Airport Landfill drainages as part of ongoing RCRA corrective action activities at the Airport Landfill SWMUs. **Include corrected text in the IM Completion Report.**
3. The removal method proposed (page 23, Section 4.4 Selected Removal Method) does not provide sufficient information to determine if the proposed removal methods (manual removal and removal using the Skyline cable pull system) will be able to achieve the desired result of debris removal, and how the debris removal activities will be executed. The text states, "In general this system requires rigging a cable from a crane or tower positioned on the mesa top at the Los Alamos County Airport to an anchor point near the road at the bottom of Pueblo Canyon." NMED requires DOE to provide detailed diagrams of the location of the proposed towers, cranes, and anchor points. It is unclear as to the size and location of the anchor points or proposed towers. The text shall include a discussion as to the type of structures planned for installation at with in the drainages. A map showing the cableway system, towers and anchor points shall be included for NMED review. In addition, DOE shall provide detailed engineering drawings for the construction of the proposed cable system in each of the drainages requiring debris removal. An evaluation of potential environmental

impacts as a result of the cable system must also be discussed in the revised IM Plan. **Provide additional information.**

4. A waste management plan that addresses investigation derived waste (IDW) must be submitted with the revised IM Plan. The waste management plan must address storage, characterization, and proper off-site disposal of all waste generated. A statement on page 21 indicates that the drums contain a “tar like substance”. For drums containing a “tar like substance,” please provide a sampling plan for the contents of the drums (see general comment #4 above). Indicate how the contents of the drums containing a “tar like substance” will be handled and discuss disposal options for the drums and their contents. A plan for safely packaging and transporting any liquids, sludges, or “tar-like” substances encountered during debris removal to the mesa top must be submitted to NMED. The waste management plan must also discuss on-site storage and subsequent characterization and disposal of waste generated. The plan must also include a discussion on the handling and repackaging (if required) of any liquids or “tar-like substances” discovered during debris removal. **Provide a waste management plan.**
5. Provide clarification where ambiguous, subjective, or vague terms have been used without further definition. Actions specified in the IM Plan that depend on subjective or vague terms must be further specified. Examples include: “suspect”, “heavily damages”, “impacted”, and “unacceptable” when used without some objective criteria for determining further action, “percentage” when used without an associated number, and “at once” when used without reference to some specified time period. **Clarify in the waste management plan or other appropriate submittal. Refrain from using ambiguous, subjective or vague terms in the IM Report.**
6. The HPT discussed sampling prior to debris removal and determined that site conditions would change significantly as a result of debris removal. The HPT agreed that the limited data collected from the drainages indicated that there should be no significant risk to workers during debris removal. NMED agreed to allow sampling of the drainages following removal based on the recommendation of the HPT. Revise the discussion regarding sampling of the drainages to accurately reflect the regulatory decisions made for proposed sampling activities for SWMU 73-001(a). **Clarify in the IM Report.**

Specific Comments

1. **Section 2.1 Site Description, Page 3**

“However, tires, car bodies, pieces of concrete and asphalt, empty drums, galvanized steel trash cans, and other miscellaneous debris are present in at least four drainage channels along the south slope of Pueblo Canyon adjacent to the landfill area.”

The above section indicates that the drums located in the drainage channel are empty; however, the statement on page 21 indicates that the drums contain a “tar like substance”. Clarify the conflicting statements and correct the text to accurately reflect the status of the drums. Provide a sampling plan for the contents of the drums (see general comment #4 above). **Provide clarification as to the content and include in waste management plan.**

2. Section 4.2 Supplemental Sampling Activities, Page 21

“For waste management purposes, only a percentage of the removed debris will be swiped and counted to confirm that no radioactive contamination exists.”

The above statement is vague. Clarify what percentage of debris will be swiped for waste management purposes and the selection criteria for confirmatory sampling. The amount of samples that will be sent to an off-site laboratory for confirmatory sampling must be identified. Swipes may not be appropriate for all wastes management activities. DOE must include a waste management plan (see general comment #4 above) for storage, characterization and proper disposal of all waste generated. Results of all waste characterization sampling must be provided to NMED in the IM Completion Report. **Address in the waste management plan.**

3. Section 4.4 Selected Removal Methods, Page 23

“In the government’s evaluation of the option to use a helicopter for debris removal it was noted that manual labor would be required to loosen, lift and carry each item to a collection bin.”

If this “government’s evaluation” has been reduced to writing, provide a copy of the evaluation as an attachment to the revised IM Plan. NMED is unaware of a basis for such an evaluation and the NMED administrative record does not contain a copy of the evaluation for the rationale to modify the HPT’s recommendation. **Provide if written evaluation exists, or provide a record of communication to clarify statement.**

4. 4.0 Selected Removal Method, Page 23

“An advantage of the skyline system is it’s (sic) capability to remove individual or multiple items located laterally, away from the alignment of the mainline cable.”

Indicate the lateral distance the mainline cable is expected to reach. In addition, NMED is unclear how the debris will be removed. Clarify how debris will be attached to the cable system and removed from the drainages. NMED is concerned the proposed method of removal may cause debris to break or potentially contaminated sediment to be spread

within the drainage or in the ambient air. Clarify how debris located laterally will be removed using the skyline cable system. In addition, indicate what precautions will be taken to ensure that sediment is not spread laterally within the drainages or in the ambient air during removal activities. If liquids, such as the “tar-like substances” are present in compromised containers or barrels, describe in detail how these wastes will be handled to ensure compatibility, storage, and characterization requirements are met. **Provide additional information.**

5. 4.0 Selected Removal Method, Page 23

“This auxiliary cable system will reduce the need to reposition the cable system.”

Clarify what the auxiliary cable system is composed of and its removal capabilities. In addition, please explain under what circumstances the cable will be required to be repositioned. **Provide additional information.**

6. 4.5 IM Implementation Phases, Page 23

“The preferred alternative approach for this IM will utilize some aspects of several of the considered alternatives.”

The statement is not specific enough. Clarify what alternatives are meant to comprise the “preferred alternative approach”. If the “preferred alternative” only includes the manual removal and use of the cable pull system, as outlined in the plan, clarify the above statement. NMED requires DOE to select a specific removal method or combination of methods and detail that method in this IM Plan. A contingency plan, to be implemented if the selected remedy is unable to achieve required results, must be included in the IM Plan or attached as an attachment. **Clarify.**

7. 4.5 IM Implementation Phases, Page 23

“A haul access road will be engineered and constructed as necessary from the airport hotpad taxiway to the canyon edge.”

Provide a map showing the proposed location of the proposed haul/access road. The airport landfill mesa top is a SWMU undergoing RCRA corrective action. NMED is concerned the proposed road may impact or disturb waste currently in place at the Airport Landfill. The SWMU and waste in the SWMU must not be adversely affected as a result of installation of a road. Indicate in detail actions to be taken to ensure waste is not disturbed and contaminant migration potential enhanced. In addition, provide a copy of the engineered drawings for the construction of the haul/access road in the revised IM Plan. **Provide additional information.**

8. 4.5 IM Implementation Phases, Page 23

“A light gauge pilot cable will be manually carried to an anchor point at the bottom of Pueblo Canyon to establish the alignment of the mainline cable.”

NMED is aware that the drainages are located in steep, remote areas that would not allow an individual to walk from the mesa top to the canyon bottom. Please explain how the cable will be deployed from the mesa top to canyon bottom. **No response needed (discussed during meeting).**

9. 4.5 IM Implementation Phase, page 24

“To eliminate the hazard associated with heat buildup by friction due to the cable contacting trees, some trees may be removed.”

Provide additional information regarding the selected removal method and the potential for fire hazard and fire suppression contingencies. In addition, provide a map detailing the location of the cable and the area of tree removal. Also include a plan to control erosion as a result of tree removal activities. **Include a discussion of activities conducted in the IM Report.**

10. 4.5 IM Implementation Phases, Page 24

“A 5,000 gal. water tanker truck will be on site during this phase of the project.”

Clarify the purpose(s) of the tanker truck. For example, will the truck be used for fire suppression, dust control, or other uses. Provide a detailed fire suppression plan including a map depicting the ability of the tanker truck or other fire suppression equipment to access the proximity of potential fire hazard areas and any additional equipment necessary to use the tanker truck for fire suppression if that is its intended purpose. **Include a discussion of activities conducted in the IM Report.**

11. 4.5 IM Implementation Phases, Page 24

“Suspect items will be sampled as necessary to define their waste categories.”

Define the term “suspect”. Clarify what criteria will be used to determine if a material is “suspect” and how it will be characterized, stored, and properly disposed (see general comment #4 above). **Address in waste management plan.**

12. 4.5 IM Implementation Phases, Page 24

“Portable particulate samplers will monitor ambient atmospheric conditions at the site during the removal phase of this project.”

Provide the location and type of the air sampling devices and indicate what constituents and particle size the samplers will be sampling for and the action levels associated with

the sampling. Discuss sample volume rates and if individual workers will be outfitted with personal monitoring devices as implemented in the Acid Canyon removal project. In addition, air sample results must be provided in the IM Completion Report. **Provide additional information.**

13. 4.5 IM Implementation Phases, Page 24

“In general site restoration will begin following sediment sampling, however, areas that are heavily damaged or impacted by removal of debris will be stabilized at once to prevent erosion.”

The above statement is vague; define “heavily damaged” or “impacted”. Indicate the procedure for determining if the erosion potential is at a level requiring stabilization activities to be implemented. Clarify and quantify what is meant by “stabilized at once”. Provide a plan for stabilization activities. If DOE plans to install engineered sediment retention structures as part of the restoration activities, detailed engineering drawings and a map of the proposed location must be submitted to NMED for review and approval. NMED suggests that the IM Plan be revised to reflect the installation of silt fences, hay bales, waddles, or other erosion control devices in the drainages requiring stabilization. **Provide additional information.**

14. Section 4.5, IM Implementation Phases, Page 24

“A field summary report will be prepared and the site inspected by DOE, Department of Defense, and the NMED.”

Although NMED may conduct a site inspection during field activities, NMED does not intend to produce a field summary report or other such reports unless the inspection identifies violations of regulations or a permit. **No response needed.**

15. 4.6 Storm Water Control and Restoration, Page 24

“These retention structures will be earthen berm with plastic liners on the upstream face and will not be designed to catch all precipitation events or ensure zero runoff from the site.”

Discuss what the retention structures are designed to accommodate. Also discuss in a waste management plan how any storm water or other runoff, and sediments will be characterized, stored, and disposed if they collect in the vicinity of the retention structure. Provide a map depicting the location of the proposed retention structures and provide detailed drawings and engineering plans for the construction of the proposed retention structures. **Include in the final IM Report.**

16. 4.6 Storm Water Control and Restoration, Page 24

“To minimize soil erosion flow retarding measures will be installed such as wattles, jute matting and straw bales.”

Provide a map showing the location of the proposed flow retarding measures. In addition, provide the type of structure proposed for each location. Provide a monitoring and maintenance schedule for the inspection of the erosion control measures post IM activities. DOE must also provide a contingency plan if the erosion control measures installed prove ineffective. **Include in the final IM Report.**

17. 5.0 Confirmatory Sampling, Page 25

“Confirmatory samples will be collected at 15 locations per drainage; however, the actual number and distribution of these sample locations will be determined following debris removal.”

The proposed confirmatory sampling plan is not sufficient. The proposed confirmatory sampling might not be adequate to determine the nature and extent of releases from the Airport Landfill SWMU. Additional sampling may be required. In addition, the selected analytical suite must be supported. Currently, there is not sufficient data to support a reduced analytical suite. NMED requires full suite analyses unless additional information to support a reduced suite can be provided. Provide a map detailing proposed sampling locations within each drainage or provide sample location selection criteria. NMED concurs with additional sample locations biased toward areas of staining or visible contamination but believes the proposed sampling is inadequate to determine nature and extent of contaminated sediment following debris removal. Proposed sampling shall follow the canyons approach for the collection of sediment samples from the mesa top to within Pueblo Canyon. **No response needed. Sampling agreed by HPT members. Additional sampling may be required to determine nature and extent.**

18. 6.2 Method of Management and Disposal, Page 26

“Even though much of the debris will be screened with hand-held radiation meters before field activities begin, a percentage of the debris will be swiped and counted before being released for recycling or disposal.”

Quantify the percentage of debris to be swiped and counted prior to disposal. All debris may not be able to be recycled or disposed of as municipal waste. DOE must submit a waste management or IDW plan as outlined in general comment #4 above. **Provide additional information in the waste management plan.**