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State of New Mexico
ENVIRONMENT DEPARTMENT



BILL RICHARDSON
GOVERNOR

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us



RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

March 20, 2006

David Gregory
Federal Project Director
Los Alamos Site Office
Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, NM 87544

David McInroy
Remediation Services Deputy Project Director
Los Alamos National Laboratory
P.O. Box 1663, Mail Stop M992
Los Alamos, NM 87545

RE: APPROVAL WITH MODIFICATIONS
REMEDY DESIGN WORK PLAN FOR THE LOS ALAMOS SITE OFFICE
TA-73 AIRPORT LANDFILL, REVISION 1
LOS ALAMOS NATIONAL LABORATORY, NM0890010515
HWB-LANL-05-015

Dear Messrs. Gregory and McInroy:

The New Mexico Environment Department (NMED) is in receipt of the *Remedy Design Work Plan for the Los Alamos Site Office, TA-73 Airport Landfill, Revision 1* (Work Plan), referenced by NW-ID-2004-031 and dated June 2005. NMED has also received the *Response to January 4, 2006 Notice of Disapproval* (Response) and the *Revisions in the DOE Response to the January 4, 2006 NOD* (Response Revisions), dated January 27, 2006 and February 28, 2006, respectively. NMED has reviewed these documents and hereby issues this notice of approval with modifications. The Department of Energy and the University of California (collectively, the "Permittees") must provide the requested additional information within 30 days of receipt of this letter in a revised Remedy Design Work Plan (RDWP). The revised RDWP must be in redline/strikeout format and must incorporate all of the changes agreed to in the Response



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Response Revisions, and any subsequent communications. All submittals must be in the form of two paper copies and one electronic copy in accordance with section XI.A of the Consent Order. NMED believes that the additional information is not needed to proceed with field activities. However, if the Permittees fail to provide the requested information, this approval will be rescinded.

The revisions to the RDWP stipulate provisions of certain deliverables to NMED in the near future. Specifically, the Permittees indicate in their responses to NMED comments regarding design deficiencies that NMED will be provided with the final designs for review and approval prior to construction. The Permittees must submit the following deliverables to NMED within 45 days of awarding the construction contract.

- Construction Quality Control Plan for the MatCon Cover, including procedures for coring and testing.
- Operation and maintenance plans for 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 professional engineer. The PCMP also states that MatCon subcontractor representatives will make annual inspections and evaluations for the first five years after installation. The Permittees must clarify whether the monthly inspection reports will also be submitted to NMED and identify the party who will inspect the cover after the first five years. Because the MatCon cover will be used for aircraft maintenance or storage, NMED is requiring the monthly inspections be maintained and annual reports be submitted for the life of the post-closure period (30 years).
- The final design for the MatCon cover.
- The final design for the retaining walls.
- The final design for the hangar pads.

The Permittees must provide the following information in the revised RDWP.

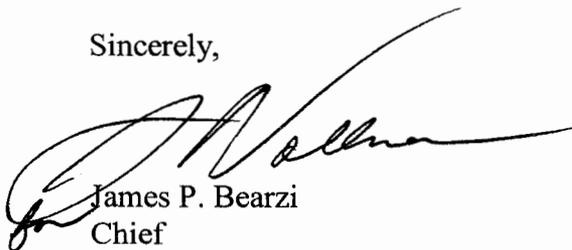
1. It appears that most of the January 4, 2006 NOD comments have been adequately addressed. However, the Permittees must ensure that any inconsistencies between the various sections of the document will be removed in the revised RDWP document. Inconsistencies may result due to the design changes that 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. The Permittees' response to NMED General Comment 4 notes information (e.g., the types of aircraft used and their weights, weight distributions when the airplanes 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. The Permittees must incorporate the information provided in the response into the revised 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. The Permittees must 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. The Permittees must incorporate the response in the text of the revised 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."

Should you have any questions regarding this letter, please feel free to contact Darlene Goering at (505) 428-2542.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:dxg

Messrs. Gregory and McNroy
Airport Landfill Remedy Design Work Plan, Revision 1 Approval
March 20, 2006
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cc: D. Goering, NMED HWB
J. Volkerding, NMED DOE OB
S. Yanicak, NMED DOE OB, MS J993
L. King, EPA 6PD-N
J. Ordaz, DOE LASO, MS A316
K. Hargis, LANL RRES/DO, MS M591
D. McNroy, LANL E/ER, MS M992
N. Quintana, LANL E/ER, MS M992
file: Reading and LANL '05