

TA73

State of New Mexico
ENVIRONMENT DEPARTMENT



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RON CURRY
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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

July 14, 2006

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

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

**SUBJECT: REQUEST FOR ADDITIONAL INFORMATION
REMEDY DESIGN WORK PLAN FOR THE LOS ALAMOS SITE
OFFICE, TA-73 AIRPORT LANDFILL, REVISION 2
LOS ALAMOS NATIONAL LABORATORY
EPA ID # 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 2* (Work Plan), dated April 2006 and referenced by NW-ID-2004-031. NMED approved with modifications the revision 1 of this Work Plan in a letter dated March 20, 2006. As part of the approval, the Department of Energy (DOE) was required to submit a revised Work Plan that incorporated all of the changes agreed to in the *Response to January 4, 2006 Notice of Disapproval*, the *Revisions in the DOE Response to the January 4, 2006 NOD*, and any subsequent communications.

In general, the Work Plan appears to adequately address most of NMED's prior comments. However, the Work Plan contains provisions for test pads test results to demonstrate cover performance and final settlement calculations after the construction contract award. In addition,



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since some of the following are provided as draft, the DOE and the Los Alamos National Security, LLC (collectively, the Permittees) must submit these documents as final within 30 days of receipt of this letter.

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

The Permittees' response to NMED's comment (see March 20, 2006 *Approval with Modifications*, comment #3) regarding the concern for the potential for run-on to infiltrate under the cap at the interface of the Matcon cover and the taxiway is not clearly documented in the Work Plan. The response states the design was revised to eliminate the potential for run-on to infiltrate under the cap and references Drawing 2005 Section G. Drawing 2005 Section G shows that a 40 mil smooth very flexible polyethylene (VFPE) liner has been added to the design of the sloping interface between the taxiway and the Matcon. Although the general specifications for the VFPE liner are provided in Section 06005 of the Construction Specifications, no specific installation procedures of this feature are provided in any of the documents. It is unclear how the non-woven geotextile and the VFPE liners will be anchored or constructed at the point of interface between the rip rap covered grade and the Matcon, or how far they extend onto the Matcon. As shown on Section G, the rip rap is directly placed on the geotextile which is underlain by the VFPE liner. No provisions for protecting the liners or preventing water from getting under the liner are discussed. It appears the non-woven geotextile is provided as a protection for the VFPE liner, but it is not discussed whether that would be sufficient, especially during construction. Management of run-off water along this interface will be managed and any interconnection between this interface and the storm sewer features shown on Drawing 2003 are also not discussed or shown on the drawings. Since this feature spans a great distance (i.e., the interface area east of Section C on Drawing 2005 to the east slopes), more detailed design and construction specifications should be provided. The Permittees must provide this information within 30 days of receipt of this letter.

The settlement evaluation text and tables reference figures that are not provided in the Work Plan. In addition, references are made to Sites C and D. These sites are not described in the Work Plan. The Permittees must clarify these references in the final settlement calculations to be provided following construction contract award.

Section 2.2 (Design Basis) of the Work Plan indicates that the new cover design for the eastern and northern slopes will produce a more stable slope. However, it does not appear that slope stability calculations are provided for the proposed new cover design for the northern and eastern slopes. The Permittees must provide slope stability calculations for the armored portions of the landfill cover. The Permittees must provide this information within 30 days of receipt of this letter.

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If you have any questions, please contact Darlene Goering of my staff at (505) 428-2542.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:dxg

cc: D. Goering, NMED HWB
S. Yanicak, NMED DOE OB, MS J993
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file: Reading and LANL TA-73 '06 (SWMUs 73-001(a-d))