



SNL: ER: AF 04 1334  
1334

## MEMORANDUM

TO: Benito J. Garcia, Chief HRMB, NMED  
 THROUGH: Neil Weber, Chief, DOE Oversight Bureau, NMED  
 FROM: Lloyd Aker, SNL/ITRI POC, DOE Oversight Bureau, NMED  
 DATE: December 15, 1995  
 SUBJECT: SNL OU 1334 RFI Work Plan

The following are AIP comments regarding the Sandia National Laboratories (SNL) Voluntary Corrective Measures Plan, Removal of Explosives Debris Mounds at ER Site 11, OU 1334 - Central Coyote Test Area, October 1995. These comments are provided for the purpose of communicating the results of our technical review. They are not provided for the purpose of representing the regulatory position of the New Mexico Environment Department.

### General Comments

1. ER Site 11 is located near the Manzanita Mountains. Soils in the area are generally coarse grained, and may exhibit relatively high permeabilities and infiltration rates. Some potential contaminants are highly mobile in the subsurface, and may have the potential to impact ground water. A decision regarding investigation of ground water should be made after completion of the VCM or as part of any subsequent RFI.
2. Although field screening methods may be useful in selecting sampling locations, field screening results by themselves are not sufficient to make site decisions and should be confirmed by Level III analyses.
3. Waste piles may be sampled and analyzed for TCLP metals and organics for the purpose of waste characterization. However, samples must be collected and analyzed for total metals and organics in order to investigate potential releases of a hazardous or hazardous waste constituents to underlying soil or other media.
4. Are verification samples collected at the completion of the VCM described in the OU 1334 RFI Workplan plan? What is the plan for determining if there is a release? How will background concentrations of potential contaminants be determined so that a decision can be made regarding any possible releases?

### Specific Comments

1. Section 2.3, Page 8 Classification and Segregation of Wastes  
 "The segregated groups of waste will include: (1) inert ordnance debris and metal fragments; (2) unexploded ordnance (UXO) or ordnance that is intact and cannot be proven to be inert; (3) uncontaminated soil..."

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The plan is unclear regarding the disposition of uncontaminated soil. Is the uncontaminated soil to be segregated into bermed, lined cells?

2. Section 2.3.3, Page 10 Soil

"Final characterization of excavated soil will be made by laboratory analysis of representative samples from the segregated waste piles for TCLP metals, HE, radionuclides, and VOCs, SVOCs, or TPH as described in Section 3."

If the soil is to be left on site, or used for fill in another area, then a representative number of discrete samples should be analyzed using Level III protocols and appropriate analyses, which do not include TCLP. Samples should be analyzed for VOCs, SVOCs, HE, metals, gross  $\alpha$ , gross  $\beta$ , and gamma radiation using laboratory methods (not field screening), and gamma spectrum.

3. Section 3.0, Page 10 Waste Characterization

Bullets 2 and 3

Analysis by gross  $\alpha$ , gross  $\beta$ , and gamma radiation using a low background proportional counter, and radionuclides by gamma spectrometry are described. Are these laboratory analyses, conducted using Level III protocols?

If there are any questions, please contact me (505-845-5933) or William P. Moats (505-845-5824) of the DOE Oversight Bureau.

William P. Moats/Tim Michael

LA:WPM:wpm

cc: Neil Weber, Chief, DOE Oversight Bureau, NMED  
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