

SNL2004



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RON CURRY
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DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 12, 2004

Patty Wagner
Manager
Sandia Site Office/NNSA
U.S. Department of Energy
P.O. Box 5400, MS 0184
Albuquerque, NM 87185-5400

Peter B. Davies
Director, Geoscience and Environment
Center (6100)
Sandia National Laboratories
P.O. Box 5800, MS 0701
Albuquerque, NM 87185-0701

**RE: SECOND NOTICE OF DEFICIENCY: RESPONSE TO COMMENTS ON
DECEMBER 17, 2003 NMED NOTICE OF DEFICIENCY, POST-CLOSURE
CARE PLAN FOR THE CORRECTIVE ACTION MANAGEMENT UNIT,
TECHNICAL AREA 3, SANDIA NATIONAL LABORATORIES/NEW MEXICO
ENVIRONMENTAL RESTORATION PROJECT, MARCH 2004
SANDIA NATIONAL LABORATORIES NM5890110518
HWB-SNL-03-025**

Dear Ms. Wagner and Mr. Davies:

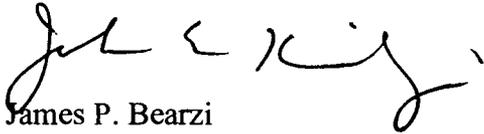
The New Mexico Environment Department (NMED) has reviewed the subject document submitted by the U.S. Department of Energy (DOE)/Sandia National Laboratories (SNL) on April 9, 2004. The document is administratively incomplete. The enclosed Notice of Deficiency (NOD) contains comments that must be addressed. DOE/SNL must submit the requested information within sixty (60) calendar days from the date of receipt of this letter.



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If you have any questions, please contact Mr. William Moats of my staff at (505) 284-5086.

Sincerely,

A handwritten signature in black ink, appearing to read "James P. Bearzi". The signature is fluid and cursive, with the first name "James" being the most prominent.

James P. Bearzi
Chief
Hazardous Waste Bureau

cc: W. Moats, NMED HWB
D. Strasser, NMED HWB
D. Bierley, NMED DOE OB
F. Nimick, SNL, MS 1087
J. Estrada, DOE NNSA/SSO
J. Gould, DOE NNSA/SSO
L. King, EPA-Region 6 (6PD-N)

File: Reading and SNL, CAMU, 2004

SECOND NOTICE OF DEFICIENCY

U.S. Department of Energy (DOE) / Sandia National Laboratories (SNL)
Response to December 17, 2003 NMED Notice of Deficiency for
Post-Closure Care Plan (PCCP) for the Corrective Action Management Unit (CAMU)
Technical Area 3
March 2004

1. Revised Post Closure Care Plan (PCCP), List of Figures, page 6, Figure 2-14 -- The title of Figure 2-14 is shown as "CAMU Containment Cell Area Boundary and Access Point". The actual Figure 2-14 is entitled "Post-Closure Perimeter Boundary for the CAMU Containment Cell Area". Correct this discrepancy.
2. Revised PCCP, Section 1.0, page 17, 3rd paragraph, 1st sentence -- This sentence states "Post-closure care began on October 7, 2003, and will continue for 30 years after that date." Add the following to the end of this sentence: "..., unless the Secretary of the NMED determines that the post-closure care period needs to be extended pursuant to 20.4.1.500 NMAC, incorporating 40 CFR 264.117(a)(2)(ii).".
3. Revised PCCP, Section 3.4, page 27, 2nd paragraph (Assessment), 3rd sentence -- The original (June 2003) PCCP stated that an unexplained soil moisture increase greater than approximately 3 percent would trigger a secondary assessment. The revised (March 2004) PCCP places this threshold at 4 percent. Justify the reason for this increased threshold.
4. Revised PCCP, Section 3.5.1, page 29, 1st paragraph (Maintenance/Repair), 1st sentence and Attachment 1 and Attachment 2 -- The original (June 2003) PCCP stated that when vegetative cover exceeds a height of 6 inches, it would be mowed. The revised (March 2004) PCCP places this threshold at 12 inches. Justify the reason for this increased threshold.
5. Revised PCCP, Section 3.5.3, page 29, 3rd sentence -- This sentence states "Following site closure, the LCRS pump will be manually activated on a schedule consistent with the inspection and maintenance schedule for the VZMS outlined in Attachment 1". Change VZMS to read LCRS.
6. Revised PCCP, Figure 2-3 -- A leachate collection tank on a secondary containment pad is shown within the area subject to post-closure care. This tank has already been decommissioned and 55-gallon drums for leachate storage are being used at the less-than-90-day area. As this pad is intended to serve as the less-than-90-day area, this figure should be labeled as such and reference to the leachate collection tank deleted.

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7. Revised PCCP, Figure 2-6, Detail 10, Plan of Leachate Collection and Storage Area -- This detail should be revised to reflect that the leachate collection tank and appurtenances are no longer in use and it should be shown as the less-than-90-day drum storage area with the appropriate controls.
8. Revised PCCP, Appendix A, Waste Analysis Plan, page 8, Section 2.2 -- This section should include a reference as to which figure(s) the location of the less-than-90-day area can be found.
9. Revised PCCP, Appendix A, Waste Analysis Plan, page 8, Section 2.2, 4th sentence -- Describe the hazardous waste or constituents expected to be found in the leachate.
10. Response to Comment #38. DOE/SNL's response to this comment is not clear to the NMED. Clarify this response.