

## **April 3, 2000 Meeting Between New Mexico Environment Department (NMED) Waste Isolation Pilot Plant (WIPP)**

### **Attendees:**

Steve Zappe - NMED  
John Young - NMED  
David Cobrain - NMED  
Cynthia Zvonar - DOE  
Linda Frank Supka - WIPP  
Robert Zimmer - HLA  
Dave Erickson - HLA

### **Summary of Meeting:**

The meeting opened with summary of today's presentation; NMED was asked to comment on any material on which they might have comments.

The RFI work plan was briefly discussed; NMED said the plan could be called something other than an RFI Work Plan, but that the planning materials submitted to the NMED cover what is in the permit.

Revised background concentrations for the SWMUs or AOCs were developed based on a combination of surface and subsurface background soil samples

Background concentration of barium increased to 170 mg/kg, chromium remained at 26 mg/kg and lead decreased to 5.4 mg/kg.

Based on the revised background values, several SWMUs and two AOCs will not be investigated further.

Eliminate 5 SWMUs based on thallium results: 001k, 001m, 001n, 001s, 001t.

Eliminate 3 SWMUs based on one constituent plus thallium: 001g, 001h, 001j.

Eliminate 2 AOC sumps based on no pathway to receptors.

NFA requests, based on HRMB guidance, will be submitted in one document. The NFA documents should be submitted with appropriate documentation. The NFA request can be submitted as an appendix to the report

To ensure coverage of the topics to be covered in the RFI Workplan documents previously submitted to NMED can be referenced. Reference of the permit application material is acceptable.

A letter, from NMED, supporting the approach outlined today for a planning document may facilitate review and approval of the SAP.

NMED suggested that WIPP draft a letter requesting approval of the approach outlined today (see action items).

WIPP noted, based on the permit, that if an NFA is requested the permit modification will be also be requested.

Data quality objectives were discussed. Each of the seven steps of the DQO process were described. It was pointed out that the full DQO process is not applicable based on the available data. The constituent

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concentrations observed in soil samples are too low to warrant additional samples; however, additional samples will be collected.

The proposed sampling strategy for the SWMUs and AOCs was discussed.

Discussion regarding the collection of additional samples at the AOCs ensued. It was pointed out that at each AOC or SWMU one soil sampling location will be outside of the AOC or SWMU to provide reference data for estimating extent.

Soil samples will be collected using direct push or similar method. Samples will be analyzed for combinations of the metals including barium, chromium, nickel and lead.

Analytical results will be compared to background results and to Region VI screening criteria.

Discussion of the individual SWMUs and AOCs was completed. The proposed sampling strategy closely followed the approach previously presented. No comments from NMED regarding the sampling strategy were raised except why we were collecting additional samples. NMED subsequently stated that earlier rounds were used to identify whether a release had occurred; extent was not identified. The proposed sampling round will be used to identify extent.

NMEMNRD NMED after review of the concentration levels at the SWMUs questioned whether the data supplied to OCD would suffice to fulfill the NFA criterion 4; essentially identify that the mudpits were closed under another authority. NMED indicated that they will review documents in the record to assess whether an NFA could be requested for the mudpits.

It was suggested that WIPP and NMED pull together pertinent records for review. NMED will look for Comment 127 (and supplemental information), the VRA, VRA/CA Report, and Supplemental Information Requested by NMED. The information contained in these documents may suffice for allowing the NFA. Closed another authority may not apply for SWMU 001q (DOE-1). NMED thinks it is fairly straightforward for an NFA request at the mudpit SWMUs.

A discussion of the AOCs was presented. The relative locations of the boreholes, mudpits and salient features were shown on figures and discussed.

It is proposed that no ecological risk assessment be performed. However, ecological risks using average concentrations and estimates of SWMU/AOC areas will be evaluated.

#### **Action Item**

Based on today's meeting the following action items will be addressed.

- WIPP letter to DOE requesting approval of the use of an SAP. NMED will respond by April 17, 2000.
- NMED review of Comment 127 (and supplemental information), the VRA, VRA/CA Report, and Supplemental Information Requested by NMED to identify if closure of some SWMUs/AOCs is possible under another regulatory authority.
- NMED will provide an Annotated RFI Workplan Outline with a statement of basis for an NFA request.