

MEMORANDUM

ENTERED

To: Steve Zappe

Through: Tim Michael TAM

From: Ralph Ford-Schmid RFS 12-29-99

Subject: Release of hazardous constituent (lead) at SWMU 000m, P-6 Mud Pit, at the Waste Isolation Pilot Plant (WIPP)

While reviewing the HRMB Technical Support Document (NMED, 1999), Table 10, I noticed that SWMU 001m had a down-gradient value for lead of 5.1 ppm (12-24") which is above the Facility-Wide Background Concentration of 3.2 ppm (12-24").

I believe that this detection was overlooked when NMED made its determination for this SWMU in Section 9.1.6, Page 22 of the above Technical Support Document. There it is noted that a release of thallium is unknown due to an unacceptably high detection limit and therefore a release of hazardous constituent may have occurred.

NMED noted in the Technical Support Document that SWMU 001m could have been granted NFA if resampled for thallium (page 16, last paragraph) but I believe the down-gradient concentration of lead indicates that a release has occurred at SWMU 001m.

References

NMED, 1999. *Technical Support Document for Exclusion/Inclusion of Solid Waste Management Units and Areas of Concern*. Permit Module VII Corrective Action for Solid Waste Management Units; Waste Isolation Pilot Plant EPA No. NM4890139088, October 27, 1999

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