



State of New Mexico
ENVIRONMENT DEPARTMENT
 Hazardous and Radioactive Materials Bureau
 2044 A Galisteo, P.O. Box 26110
 Santa Fe, New Mexico 87502-6110
 Telephone (505) 827-1567
 Fax (505) 827-1544



GARY E. JOHNSON
 GOVERNOR

PETER MAGGIORE
 SECRETARY

PAUL R. RITZMA
 DEPUTY SECRETARY

June 30, 2000

Michael Zamorski
 Acting Area Manager
 Kirtland Area Office
 P.O. Box 5400
 Albuquerque, NM 87185-5400

Robert J. Eagan
 Vice President, Division 6000
 Sandia Corporation
 P.O. Box 5800, MS 0724
 Albuquerque, NM 87185-0724

Re: **REQUEST FOR SUPPLEMENTAL INFORMATION: RCRA CLOSURE PLAN FOR THE SNL/NM INTERIM STORAGE SITE, DECEMBER 1999**

Dear Mr. Zamorski and Mr. Eagan:

The RCRA Permits Management Program (RPMP) of the New Mexico Environment Department's (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has reviewed the *RCRA Closure Plan for the SNL/NM Interim Storage Site* (the Closure Plan). Comments and suggestions are offered under the pertinent section/subsection of the Plan, which are in **bold font**. For purposes of clarity, text may be excerpted from the Plan and included in the comments in *Italics*.

SPECIFIC COMMENTS

3.0 Waste Description and Maximum Volume Stored...

RCRA-regulated hazardous waste types and quantity... may include, but are not limited to....

Comment 1: The waste inventory should be comprehensive (radiological and hazardous wastes) and should include those wastes unidentified in the Closure Plan [20.4.1.600 NMAC incorporating 40 CFR 265.112 (b)(3)]. Additionally, the Closure plan should include all inventory reports and disposition records (or an adequate summary) for wastes stored at the ISS during its history, so that this information is available to the public as a permanent record.

4.1 Phase 1: Data Quality Objective Process

Identify Inputs to the Decision. Comment 2: Records review and visual observations alone are insufficient; confirmatory samples should also be collected (see Comment 3 below). HRMB personnel will make a final walkover inspection of the ISS before a decision on clean closure is reached.

46WA SNL G100



Mr. Zamorski and Mr. Eagan

June 30, 2000

Page 2

Define the Study Boundaries. ...*Visual observations...are limited to...areas used for RCRA-regulated hazardous waste management activities. If surface-soil sampling is necessary...samples will be collected from within the fenced area....*

Comment 3: On Figure 2, SNL should delineate storage areas for specific wastes or groups of wastes. Confirmatory soil samples should be collected from these storage areas and analyzed for appropriate constituents of concern (CoCs). It may be necessary to collect confirmatory soil samples from outside of the fence if storage containers were placed against it.

Develop the Decision Rule. *If, based on the records review and visual observations at the site, there are no indications of potential soil contamination...the ISS will be considered "clean."*

Comment 4: If contaminants are found above approved background levels, a risk assessment must be completed, and, if necessary, the site cleaned up to levels protective of human health. Also, see Comments 2 and 3.

4.4 Phase IV: Closure Certification

Comment 5: NMED requests that SNL prepare a final closure report for the ISS (20.4.1.600 NMAC incorporating 40 CFR 265.115). This report should include discussions of:

- Operational history and waste inventory,
- Sampling results and "hits",
- Variances from the Closure Plan and,
- Results of any risk assessments.

5.1 Sample Locations, Collection, and Handling

See Comments 2 and 3.

5.2 Laboratory Analysis

Comment 6: TCLP analysis for metals in soil is inadequate, NMED HRMB requires analysis for total metals. Also, see Comments 2 and 3.

Sincerely,



William P. Moats

Project Leader, SNL/KAFB

RCRA Permits Management Program

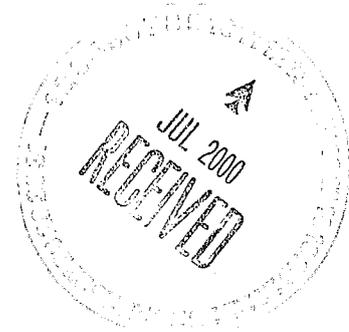
WPM/wsm

Mr. Zamorski and Mr. Eagan

June 30, 2000

Page 3

Cc: J. Bearzi, NMED HRMB
J. Kieling, NMED HRMB
C. Abeyta, NMED HRMB
R. Dinwiddie, NMED HRMB
P. Allen, NMED HRMB
W. McDonald, NMED HRMB
D. Neleigh, EPA-Region 6 (6PD-N)
B. Oms, DOE KAO
G. Laskar, DOE KAO
F. Nimick, SNL
File: SNL, ISS, 00



Attachment B

Response to Request for Supplemental Information

Sandia Response to Request for Supplemental Information: RCRA Closure Plan for the SNL/NM Interim Storage Site

The original comments from the NMED (June 30, 2000) were based on the December 1999 Closure Plan and are in Italics.

3.0 Waste Description and Maximum Volume Stored.....

Comment 1: The waste inventory should be comprehensive (radiological and hazardous wastes) and should include those wastes unidentified in the Closure Plan [20.41.600 NMAC incorporating 40 CFR 265.112 (b)(3)]. Additionally, the Closure Plan should include all inventory reports and disposition records (or an adequate summary) for wastes stored at the ISS during its history, so that this information is available to the public as a permanent record.

Response: The SNL/NM ISS Inventory lists the RCRA hazardous waste codes, radiological data, and volumes for mixed wastes stored at the ISS and is in Attachment 1 to the RCRA Closure Plan for the SNL/NM ISS, February 2001. The disposition of the items is listed in the Inventory.

4.1 Phase I: Data Quality Objective Process, Identify Inputs to the Decision.

Comment 2: Records review and visual observations alone are insufficient; confirmatory samples should also be collected (see Comment 3 below). Hazardous and Radioactive Materials Bureau (HRMB) personnel will make a final walkover inspection of the ISS before a decision on clean closure is reached.

Response: The revised Closure Plan, 4.1 Phase I: Data Quality Objective Process, includes a discussion of confirmatory samples of surface soils that will be collected. Twenty-five (25) sampling points will be located across the ISS and a minimum of 25 surface-soil samples will be collected, as shown in Figure 3, ISS Proposed Sampling Points.

Define the Study Boundaries..... *"Visual observations....are limited to...areas used for RCRA-regulated hazardous waste management activities. If surface-soil sampling is necessary....samples will be collected from within the fenced area..."*
Comment 3: On Figure 2, SNL should delineate storage areas for specific wastes or groups of wastes. Confirmatory soil samples should be collected from these storage areas and analyzed for appropriate constituents of concern (CoCs). It may be necessary to collect confirmatory soil samples from outside of the fence if storage containers were placed against it.

Response: Since storage containers were moved to different sections of the ISS during the operational period of the site, specific storage areas can not be delineated in Figure 2. Confirmatory soil samples will be collected from the ISS (as discussed in Comment 2 above) and analyzed for appropriate constituents of concern, as discussed in section 5.0 Sampling and Analysis Plan. Storage containers were not placed against the fence. Samples will be collected from

sampling points along the fence line, as discussed in section 4.1 Phase I and shown in Figure 3.

Develop the Decision Rule. *If, based on the records review and visual observations at the site, there are no indications of potential soil contamination....the ISS will be considered "clean."*

Comment 4: If contaminants are found above approved background levels, a risk assessment must be completed, and, if necessary, the site cleaned up to levels protective of human health. Also, see Comments 2 and 3.

Response: Analytical results will be compared to the applicable SNL/NM background levels approved by the NMED Hazardous Waste Bureau. Section 4.3 Phase III: Removal Procedure, describes the removal of surface soil if contamination requiring remediation is found.

4.4 Phase IV: Closure Certification

Comment 5: NMED requests that SNL prepare a final closure report for the ISS (20.4.1.600 NMAC incorporating 40 CFR 265.115). This report should include discussions of:

- *Operational history and waste inventory,*
- *Sampling results and "hits",*
- *Variances from the Closure Plan and,*
- *Results of any risk assessments*

Response: The final closure report will include the topics listed above and are discussed in section 4.4 Phase IV: Closure Certification.

5.1 Sample Locations, Collection, and Handling

See Comments 2 and 3.

Response: Sample locations for the ISS are indicated in Figure 3 and are described in section 4.1 Phase I. Collection and handling of the samples are described in sections 4.1 Phase I, 4.3 Phase III, and 5.0 Sampling and Analysis Plan.

5.2 Laboratory Analysis

Comment 6: TCLP analysis for metals in soil is inadequate, NMED HRMB requires analysis for total metals. Also, see Comments 2 and 3.

Response: Analysis for total metals will be conducted, as described in sections 4.1 Phase I, 5.2 Laboratory Analysis, and Table 1, Sampling and Analysis Plan for Closure of the ISS.