

DOE F 1925.8
(8-88)
EPG (07-90)

United States Government

Department of Energy

memorandum

DATE: JUL 9 1991

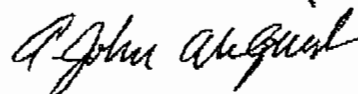
REPLY TO
ATTN OF: EM-452 (A. John Ahlquist)

SUBJECT: Comments on the Compliance Activities Workplan for the Mixed Waste Landfill

TO: R. Sena, AL

Attached are our comments on the Compliance Activities Workplan for the Mixed Waste Landfill.

Please contact me if you have any questions (FTS 233 8184).



A. John Ahlquist
 Chief
 On-Site Remediation Branch
 Division of Southwestern Area Programs
 Office of Environmental Restoration

Attachment

JUL 12 1991

Compliance Activities Workplan
for the
Mixed Waste Landfill

-Comments-

1. The workplan should include a milestone schedule. Currently, the only discussion of schedule appears as one sentence in the Summary on page 58. A section in the body of the plan should be added to explicitly discuss the schedule.
2. The necessity for a fifth well should be stated clearly in the introduction. Regulatory drivers, if any, should be cited.
3. The plan should address the distinct possibility of intersecting a contamination plume beneath the landfill during the course of slant drilling (as shown at Page 26). The plan should address what, if any, useful data for characterizing the plume will be recorded and what protective measures will apply, should this event arise. Also, this should be addressed as a contingent data quality objective, at page 47.
4. At page 13, Figure 2 should locate the Mixed Waste Landfill.
5. At page 25, the last five words on the previous page are repeated at the top of the page. Also, at line 26, change "15" to "15 degrees."
6. The draft copy of the plan contained duplicate page 55s.
7. Number the pages of the appendices. The seventh page of Appendix B provides a table which contains metals concentrations levels in subsoil samples. It would be useful to add a second column with reference values for comparison with typical western soils. A suggested reference is USGS Paper 1270 "Elemental Concentrations in Soils and Other Surficial Materials of the Conterminous U.S."

COMPLIANCE ACTIVITIES WORKPLAN
FOR THE MIXED WASTE LANDFILL
SANDIA NATIONAL LABORATORIES

GENERAL COMMENTS

1. If acronyms are going to be used in the plan, there should be an acronym table included in the document.
2. There are a number of grammatical and spelling errors in the Plan. Suggest an editor review the entire document.
3. Nowhere in the document is there any reference to the associated NEPA activities. Until DOE waives these requirements, provisions for NEPA compliance needs to be addressed.
4. It might be appropriate to include a table listing potentially applicable regulations. This list should include DOE Orders as well as Site Regulations.
5. There is really no schedule of events in the Plan. It would be of some value if a preliminary sequence of events would be included.

SPECIFIC COMMENTS

Page 5, Para 1

Suggest you reference Figure 6, page 20 for clarity.

Page 16, Figure 4

Suggest you provide a more detailed figure, if no security is involved

Page 15, Para 1, Line 5

Suggest you include the unit designation that goes with the number 266 and delete the acronym SNL as it is assumed.

Page 24, Para 5, Line 8

Suggest you correct the sentence beginning on this line and continuing on page 24.

Page 38 and 39, Para 3.3.1, Line 7

Suggest you expand on the last sentence on page 38 continuing on page 39.

Page 39, Section 3.4, Para 3, Line 3

Is "WHIP" an acronym, if so it's root should be provided.

Page 46, Para 2

Please explain what document Sections 3.4.2 and 3.2.3 are in.

DOE F 1326.7
1-82

Exception to SF 74, Approved by NARS, June 1978

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9. TO
John Andrews
*It was unclear if you
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