

Attachment

Class 2 PMR Comment Matrix

NMED Response to Public Comments on LANL Class 2 Permit Modification Request to Amend the 16-399 Closure Plan

September 2022

Comment No	Commenter	Comment	NMED Response	Modifications to the Class 2 PMR to Amend the 16-399 Closure Plan
1	Joni Arends, Concerned Citizens for Nuclear Safety (CCNS)	<p>Because high explosives contain PFASs, CCNS urges the Hazardous Waste Bureau, in order to ensure clean and efficient closure of this site in a timely manner, to include proactive methodical requirements in the amended Closure Plan for sampling for PFASs in the waste piles, surface, ground and storm water, as well as soils in the drainages from the TA-16-399 Burn Tray to Water Canyon. (Fig. 5), p. 31.</p> <p>Similar to the concentration found for explosive compounds, barium and dioxins/furans, CCNS anticipates that PFASs sampling results will also result in contaminant concentrations above a human health risk indicated HI target level of 1 established by the NMED-HWB. The PFAS sampling should be done in conjunction with the Environmental Protection Agency (EPA) recent more protective levels in PFASs levels to parts per quadrillion (ppq) and New Mexico's recent</p>	<p>Since the site does not have documentation for its operations between 1951-1980, the New Mexico Environment Department (NMED) is directing the Permittees to include Polyfluoroalkyl and Perfluoroalkyl compounds (PFAS) Perfluorooctanoic acid (PFOA), Perfluorooctane Sulfonate (PFOS) to the analytical suite. Since surface deposition from burn operations and run-off are the most likely sources of contamination under the site conceptual model, sampling locations should be added to the closure plan at the same depths and locations as depicted in Figure 4.</p> <p>The 2022 NMED Soil Screening Guidance (SSG) recommends that PFAS, PFOA, and PFOS be included in analytical suites based on the mobility and persistence of the substance (NMED SSG, 2022). PFAS, PFOA, PFOS is a suite of man-made chemicals which have been used in fire suppression foam, batteries, etching for semiconductors, electrical wiring, and in explosives,</p>	<p>NMED has added Perfluoroalkyl compounds (PFAS) Perfluorooctanoic acid (PFOA), Perfluorooctane Sulfonate (PFOS) (Section 5.4 of the NMED SSG, 2022) to Section 6.1.2, and to Tables 2, 4, and 5, to include EPA draft sampling methods for Perfluoro-compounds. NMED has also updated the proposed locations in Figure 4 for samples to be collected from two depths: 0-0.5 inches, and 0.5-6 inches. The Permittees must also collect three (3) baseline samples for PFAS/PFOA/PFOS that are denoted with X in the attached figure.</p>

		Triennial Review of New Mexico's Water Standards.	propellants, and munitions (Gaines, 2022). Surface water and groundwater are being monitored under different programs.	
2	CCNS	The Permittees have included a reference to a footnote "a" following the title for Table 2. But there is no footnote "a" on page iv.	NMED has independently verified that footnote 'a' is included on the copies provided on NMED's website and on LANL's Electronic Public Reading Room (EPRR). footnote reads: "a Based on the Unit operating record 1980-2012." NMED notes that the footnote 'a' was inadvertently included by the Permittees in the Table of Contents.	NMED has corrected the typographical error in the Table of Contents.
3	CCNS	CCNS urges the NMED-HWB to explore the use of bioremediation to address the contamination. The Communities for Clean Water (CCW) has been working on bioremediation projects in New Mexico. CCW would appreciate the opportunity to talk with the Bureau about that work and the possibilities of the use of bioremediation for removing the contamination as an alternative to "scoop and move."	Comment noted. NMED encourages the Permittees to explore treatment technologies including bioremediation which may lead to reduction in the remedial waste volumes in future. NMED welcomes a dialogue with CCNS regarding this technology in the future.	No changes to the Amended Closure Plan.
4	CCNS	CCNS is concerned about the proposed delays in making sampling locations, etc. available to the public until the Closure Certification Report is submitted to the NMED-HWB. P. 9. CCNS requests that the NMED-HWB require an interim sampling report from the Permittees	The Code of Federal Regulations (CFR) 40 265.115 specifies that the Permittees must provide a certification that the unit has been closed (Closure Certification Report) to NMED within 60-days of completing closure activities. The Closure Certification Report will be made available to the Public thru the EPRR and NMED website. NMED will review	No changes to the Amended Closure Plan.

		that is posted in the Electronic Public Reading Room. (Sec. 10), p. 14.	the certification report, and the public may provide written comments on the Report to NMED. Any written comments received will be considered prior to approving or denying the Closure Certification Report.	
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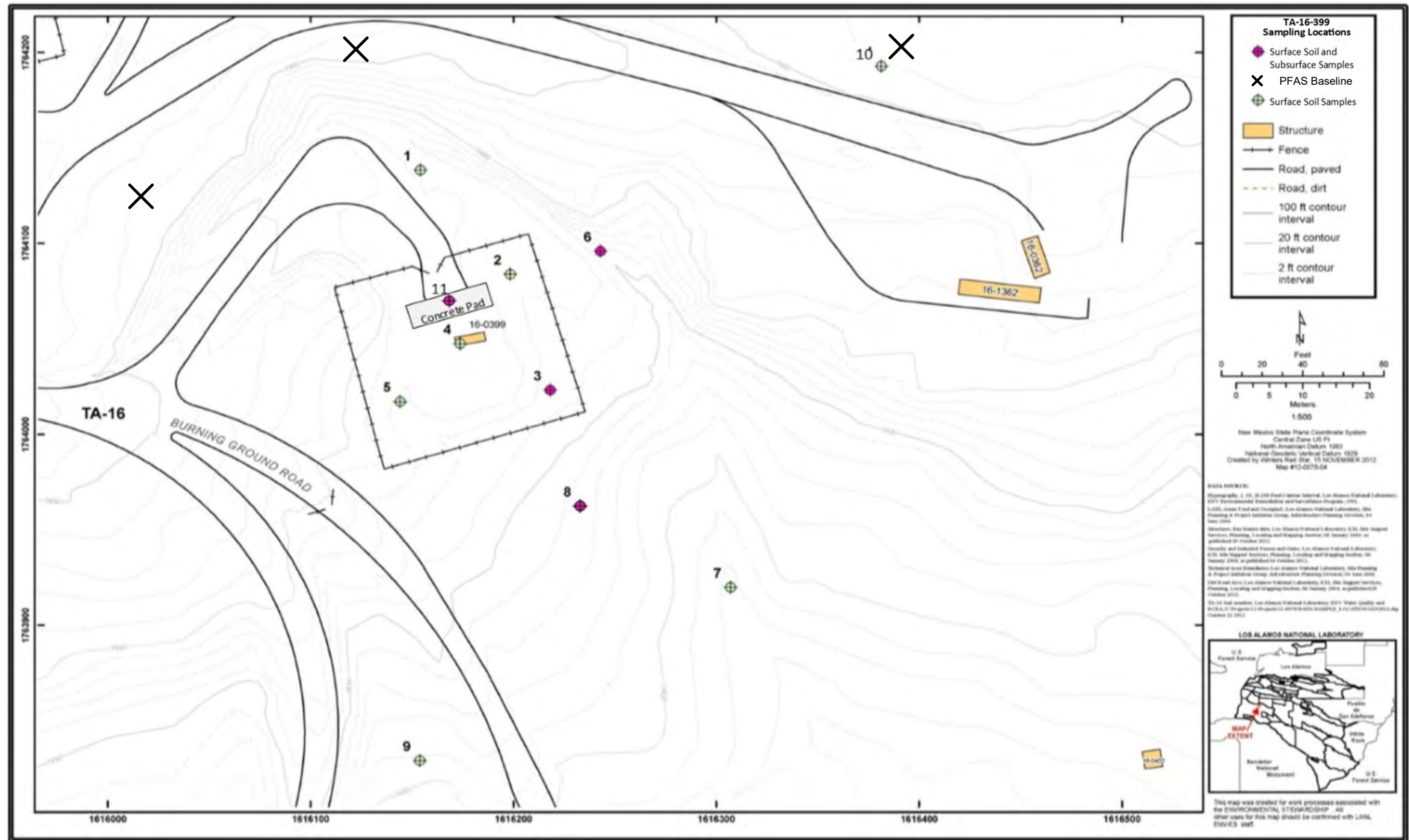


Figure 4. Technical Area 16-399 Soil Sample Locations for Closure of Unit