



BRUCE KING
GOVERNOR

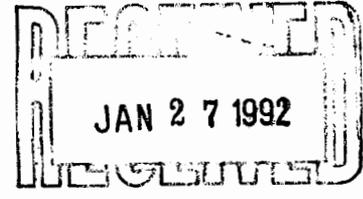
State of New Mexico

ENVIRONMENT DEPARTMENT

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

File LANL
Rec'd 92



January 21, 1993

Joseph C. Vozella, Acting Chief
Environment, Safety and Health Branch
U.S. Department of Energy
Los Alamos Area Office
Los Alamos, New Mexico 87544

Dear Mr. Vozella:

Thank you for your letter of December 24, 1992 outlining your agency's response to the concerns raised by the NM Environment Department in our letter dated November 19, 1992. We find your response satisfactory in addressing most of our concerns; however, we feel that the following issues still need to be resolved:

- 1) In General Comment #3 of your 12/24/92 letter, the response states that the "final grid spacing will be determined based on the results of the field screening". It was the Department's understanding that LANL would use an approximate 1-meter spacing in the first six rows, and an approximate 2-meter spacing in the remaining four rows as was proposed in the original Sampling and Remediation Plan (SRP) submitted to this office. In order for us to fully review and approve the SRP, a maximum grid spacing will need to be proposed by LANL, with the understanding that field screening may indicate the need for a closer grid spacing.
- 2) Subsection 4.2, Paragraph 2: The action levels used as the trigger for requiring discrete analysis of sampling locations within a composite should be equal to $1/n \times 20$ ppm, where "n" is the number of subsamples in a composite and 20 ppm is the cleanup level for mercury. For example, in a column where ten subsamples are composited, the action (trigger) level should be $1/10 \times 20$ ppm = 2 ppm. This method assures that no one of the subsamples exceeds the cleanup level.



TL

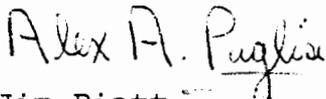
Joseph C. Vozella
January 21, 1993
Page 2

- 3) Subsection 4.2 Paragraph 6: Toxic metals should be analyzed for in all samples collected including those taken in rows 6 through 10. Initial samples taken at this site showed lead at concentrations above detection, but were analyzed using the TCLP method. As stated in general comment #4, total metals analyses should be utilized for site characterization purposes. In regards to the characterization for TPH, LANL should state what cleanup levels will be used at the site so that they can be reviewed by the NMED. This investigation is intended to determine the extent of contamination, therefore, samples may need to be taken outside the obvious area of contamination ("hot spot") including rows 6 through 10.

I am sure that these issues can be immediately resolved through the cooperative efforts of DOE, LANL and NMED staff. A final SRP must be submitted to this office by February 8, 1993, so that final review and approval of the plan can be completed within a reasonable period of time.

If you have any questions regarding this matter, please contact Alex Puglisi at 827-2799 or Danny Katzman at 827-4313.

Sincerely,



Jim Piatt
Chief
Surface Water Quality Bureau
Water and Waste Management Division

JP/AAP/DK/mlt

cc: A. Tiedman, ADO, LANL, MS A120
T. Gunderson, EM-DO, LANL, MS K491
C. Nylander, EM-DO, LANL, MS K491
K. Hargis, EM-8, LANL, MS K490
D. McInroy, EM-9, LANL, MS-992
M. Saladen, EM-8, LANL MS K490
S. Rae, EM-8, LANL, MS K490
Bruce Swanton, Program Manager, Hazardous & Radioactive
Materials Bureau
✓Danny Katzman, Geologist III, Hazardous & Radioactive
Materials Bureau
Barbara Driscoll, USEPA, RCRA Permits Branch