



**Department of Energy**

Albuquerque Operations Office  
Los Alamos Area Office  
Los Alamos, New Mexico 87544

APR 02 2001



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James P. Bearzi, Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2044-A Galisteo Street  
P. O. Box 26110  
Santa Fe, New Mexico 87505

Dear Mr. Bearzi:

**Subject:** Third Response to Request for Information Pursuant to the New Mexico Hazardous Waste Act and the Resource Conservation and Recovery Act, Los Alamos National Laboratory (LANL), EPA ID NO. 0890010515

The purpose of this letter is to provide the third U.S. Department of Energy/University of California (DOE/UC) response to the New Mexico Environment Department's (NMED) Request for Information (Mr. James Bearzi, Hazardous Waste Bureau, dated February 12, 2001, pertaining to the Los Alamos National Laboratory, EPA ID NM. 0890010515). This is the third portion of DOE/UC's response to Request No. 18, as specified in the DOE/UC letter of March 1, 2001. A brief summary of this response is provided below. The complete response and supporting documentation are included as attachments to this letter.

**Summary of Response to Request No. 18**

The response describes the Category 1, 2, and 3 data being submitted today in response to this request. In accordance with Instructions 4 and 5, page 3 of NMED's February 12, 2001 letter, as amended by instructions NMED provided via letters on March 13 and March 23, 2001, DOE and LANL are submitting two copies of seven Category 1 documents, as listed in Attachment B of this letter. These documents, which were listed in Appendix C of DOE/UC's March 1, 2001 response, are the ones LANL was able to physically locate, reproduce, and clear for release by classification review prior to today's deadline. Because DOE security requirements mandate that all such documents undergo classification review prior to release, the remaining documents listed in Appendix C of DOE/UC's March 1, 2001 response that were not provided today will be provided to the NMED as soon as classification review is completed. This is in accordance with Instruction 5, page 3 of NMED's February 12, 2001 letter.

Also enclosed herewith are two copies of eight maps showing sample locations, as Category 2 data in today's submittal as Attachment C. Two copies of documents responsive to the modified definition of Category 3 data (i.e., boring logs, well construction details/schematics, and pilot testing reports) are included as Attachment D to this letter. The modified instructions for Category 3 submittals were provided to DOE/UC in NMED's letter dated March 23, 2001. Data are included for two Potential Release Sites (PRSs) listed in Attachment A, Part 2 of NMED's



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February 12, 2001 letter that are managed by the MDA Focus Area and the High Explosives Production Sites Team.

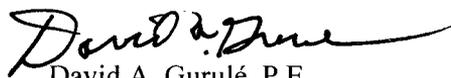
The listing of the persons responsible for the production of the data used to answer all portions of the DOE/UC response was included in DOE/UC's March 1, 2001 submittal, as required by Request Nos. 20 and 21 of your February 12, 2001 letter. No additional personnel were involved with today's submittal. A certification for the Category 1 and 2 data enclosed herewith is also attached as required by 20.4.1 NMAC, Subpart IX, §270.11(d)(1).

### Conclusion

Additional information will be provided to NMED as it becomes available, in accordance with the schedule in our March 1, 2001 response. We appreciate the amended guidance NMED has provided in its recent letters, and we remain hopeful that working in coordination with NMED to provide the requested information will expedite the current schedule for the renewal of the LANL permit.

If you have questions concerning this submittal, please contact Gene Turner, DOE Los Alamos Area Office, at (505) 667-5794 or Jack Ellvinger, UC/LANL, at (505) 667-0633.

Sincerely,



David A. Gurulé, P.E.  
Area Manager

LAAME:3GT-005

Enclosures

cc:

See page 3

cc w/enclosures:

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M. Baker, ESH-DO, LANL, MS-J591

J. Canepa, EM/ER, LANL, MS-M992

M. Kirsch, EM/ER, LANL, MS-M992

D. McInroy, EM/ER, LANL, MS-M992

P. Schumann, EM/ER, LANL, MS-M992

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J. Ellvinger, ESH-19, LANL, MS-K490

G. Bacigalupa, ESH-19, LANL, MS-K490

RPF, LANL, MS-M992

## ATTACHMENT A

**Response to Request for Information  
Pursuant to the New Mexico Hazardous Waste Act  
and the Resource Conservation and Recovery Act  
Los Alamos National Laboratory  
EPA ID No. 0890010515**

### Introduction

The following information is the third portion of the response by Los Alamos National Laboratory (LANL) to a Request for Information (RI) sent by the New Mexico Environment Department (NMED) on February 12, 2001. The full title of the RI is "Request for Information Pursuant to the New Mexico Hazardous Waste Act and the Resource Conservation and Recovery Act, Los Alamos National Laboratory, EPA ID No. 0890010515," received by LANL on February 16, 2001. The RI asked for additional information regarding corrective action requirements in conjunction with the renewal of the LANL Resource Conservation and Recovery Act Hazardous Waste Facility Operating Permit, originally issued on November 8, 1989.

This portion of the response includes information submitted in follow-up to the initial LANL response submitted on March 1, 2001, and the second information submittal provided on March 16, 2001. This response includes several tables (Attachments B, C, and D) and a number of documents providing supplemental information for Information Request No. 18 of the RI, as discussed in the following paragraphs.

18. *For each Site listed in Part 1 of Attachment A, please submit all analytical data in LANL's possession that has not been previously submitted to NMED. Include data that was obtained under a RCRA Facility Investigation for the Site and for which an RFI Report has not been submitted to NMED. Submit the data in compliance with the format and content requirements set forth in Part 2 of Attachment A.*

For the 108 Potential Release Sites (PRS) listed in Attachment A, Part 1 of NMED's February 12, 2001, letter, data responsive to Request No. 18 falls into three general categories, as defined in the U.S. Department of Energy/University of California (DOE/UC) March 1, 2001, response:

- Category 1 data are data reported in documents previously published (by the Laboratory and others) that have not been previously submitted to the NMED. Some of these data might also be included in Category 2 (defined below), while other data may not. By nature, Category 1 data consist of hard copy records (i.e., published documents). Sixteen (16) Category 1

documents were submitted to NMED on March 1, 2001. DOE/UC stated that additional Category 1 documents would be provided to NMED on April 1, 2001.

In accordance with Instructions 4 and 5 on page 3 of NMED's February 12, 2001 letter, as amended by instructions NMED provided via letters on March 13 and March 23, 2001, the Laboratory today is submitting herewith two (2) copies of seven (7) Category 1 documents, as listed in Attachment B of this response. These documents (which were listed in Appendix C of DOE/UC's March 1, 2001, response) are the ones LANL was able to physically locate, reproduce, and clear for release by classification review prior to today's deadline. Because DOE security requirements mandate that all such documents undergo classification review prior to release, the remaining documents listed in Appendix C of DOE/UC's March 1, 2001, response that were not provided today will be provided to the NMED as soon as classification review is completed, in accordance with Instruction 5 on page 3 of NMED's February 12, 2001, letter. Please note that several documents were listed in Appendix C of DOE/UC's March 1, 2001, response erroneously, as further review has indicated that they did not contain data obtained under an RFI and therefore were not responsive to Request No. 18. They will not be submitted.

- Category 2 data are electronic data currently contained in (or planned to be included in) the database housed in the Laboratory's Facility for Information Mapping, Analysis, and Display (FIMAD). This includes both data in published reports that have not been previously submitted to NMED (i.e., Category 1 data) and data not yet published in reports. Category 2 data, therefore, consist of both electronic and hard copy records. A data set containing approximately 490,000 records was submitted to NMED on March 16, 2001, in accordance with instructions NMED provided via a letter dated March 13, 2001, and satisfying the requirement in that letter. Eight maps are included as Category 2 data in today's submittal (see Attachment C of this response for a listing of these maps).
- Category 3 data are data not contained in FIMAD, but housed elsewhere in the form of field data records, core logs, geophysical logs, field logbook entries, sample collection logs, screening data, field survey/project scoping data, Chem Van samples, screening samples, waste samples, verification samples, etc. (i.e., data described in Attachment A, Part 2 [page 3] of NMED's letter as "other applicable data results"). Category 3 data, therefore, consist primarily of hard copy (and, occasionally, electronic) records. DOE/UC stated that Category 3 data would be submitted to NMED in three phases on April 1, May 1, and June 1, 2001, respectively.

The Laboratory received additional guidance from NMED regarding Category 3 data via a letter dated March 23, 2001. This guidance further modified NMED's submission requirements regarding Category 3 from those initially given in Attachment A, Part 2 of NMED's February 12, 2001 letter and modified by NMED via a letter dated March 13, 2001. NMED stated that boring logs, well construction details/schematics, and pilot testing reports will constitute a complete submittal under this requirement, and that the additional items mentioned as Category 3 data by DOE/UC on March 1, 2001 (i.e., field data records, core logs, geophysical logs, field logbook entries, sample collection logs, screening data, field survey/project scoping data, Chem Van samples, screening samples, waste samples, verification samples, etc.), need not be submitted to NMED.

Enclosed herewith are two copies of documents responsive to this modified definition of Category 3 data (i.e., boring logs, well construction details/schematics, and pilot testing reports) for two (2) PRSs given in Attachment A, Part 2 of NMED's February 12, 2001, letter that are managed by the Material Disposal Areas Focus Area and the High Explosives Production Sites Team. Attachment D of this response provides a listing of responsive Category 3 documents (two copies enclosed herewith) by associated PRS.

In accordance with Instruction 5, page 3 of NMED's letter, in the course of implementing the schedules provided herein for delivery of Category 1, 2, and 3 data, if data become known that are in addition to the quantities estimated above, those data will be retrieved, verified, reproduced, and subjected to classification review as expeditiously as possible, and the Laboratory's responses to NMED will be supplemented as appropriate.

**ATTACHMENT B**

**List of Category 1 Hardcopy Documents for 2/12/01 NMED  
Response to Request for Information**

(The hardcopies of the documents were provided to the New Mexico  
Environment Department as a separate package.)

ATTACHMENT B

Category 1 Hardcopy Documents for 2/12/01 NMED Response to Request for Information

PRS	Title/Subject	Date of Document	LA-UR # or Reference #	ER ID #	Page Count	Information Request Number	Due Date to NMED	Special Notes/ Comments	Contact Person
21-015	RFI Report for Potential Release Site at TA-21, 21-015 Material Disposal Area B (Internal Report for MDA B)	Nov-96	96-4444	69654	70	18	4/1/01		Hopkins, John
1-003(d)	Los Alamos National Laboratory Environmental Restoration Project Voluntary Corrective Action Plan for Solid Waste Management Unit 1-003(d) Can Dump Site	Jul-95	01-1362	69667	11	18	3/16/01	Submittal: 4/01/01	Riebe, Nancy
36-001	Interim Action Plan for Potential Release Site, 36-001	May-96	01-1361	69668	9	18	3/16/01	Submittal: 4/01/01	Riebe, Nancy
1-001(d)	Remedial Action Status Report for Potential Release Site, 1-001(d) Hillside 138	Jan-97	01-1363	69669	24	18	3/16/01	Submittal: 4/01/01	Riebe, Nancy
1-001(f)	Los Alamos National Laboratory Environmental Restoration Project Voluntary Corrective Action Plan for Solid Waste Management Unit 1-001(f) Hillside 140 Septic Outfall. Rev. 2	Sep-95	01-1359	69670	54	18	3/16/01	Submittal: 4/01/01	Riebe, Nancy
15-004(f)	Technical Feasibility Demonstration Project at TA-15: E-F Firing Site (Draft Plan)	Apr-99	01-1358	69678	18	18	3/16/01	Submittal: 4/01/01	Riebe, Nancy
1-001(s)	Interim Action Report for a Potential Release Site at TA-1, 1-001(s) Western Sanitary Waste Line Locations 9, 10, 11, and 1A	Sep-96	96-3352	69685	18	18	4/1/01		Hickmott, Donald

**ATTACHMENT C**

**List of Enclosed Maps by Potential Release Site (PRS)**

(The maps were provided to the New Mexico Environment Department as a separate package.)

## ATTACHMENT C

### List of Enclosed Maps by Potential Release Site (PRS)

<b>SWMU NUMBER</b>	<b>PRS NAME</b>
16-008(a)	90s Line (1)
16-008(a)	90s Line (2)
16-003	Fish Ladder
16-007(a)-99	MDA F
9-013	MDA M (north)
9-013	MDA M (south)
9-013	MDA M (springs)
8-006	MDA Q

## **ATTACHMENT D**

### **PRSs for which Category 3 Hardcopy Information is Provided**

(The hardcopies of the information were provided to the New Mexico Environment Department as a separate package.)

**ATTACHMENT D**

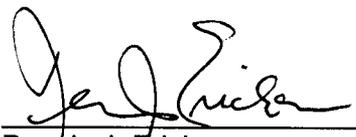
**PRSs for which Category 3 Hardcopy Information is Provided**

<b>PRS Number</b>	<b>ER ID Number</b>	<b>Page Count</b>	<b>Information Request Number</b>
16-019 MDA-R	69657	5	18
16-008(a) 90s Line Pond	69663	18	18

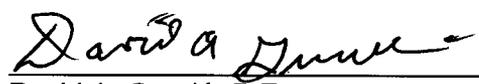
**CERTIFICATION**

**CATEGORY 1 AND 2 DOCUMENTS SUBMITTED IN THE  
THIRD RESPONSE TO REQUEST FOR INFORMATION PURSUANT TO THE  
NEW MEXICO HAZARDOUS WASTE ACT AND THE RESOURCE CONSERVATION AND  
RECOVERY ACT, LOS ALAMOS NATIONAL LABORATORY EPA ID No. 0890010515**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
\_\_\_\_\_  
Dennis J. Erickson  
Division Director for Environment, Safety, and  
Health Division  
Los Alamos National Laboratory  
Operator

4/2/01  
\_\_\_\_\_  
Date Signed

  
\_\_\_\_\_  
David A. Gurulé, P.E.  
Area Manager, Los Alamos Area Office  
U.S. Department of Energy  
Albuquerque Operations  
Owner/Operator

4/2/01  
\_\_\_\_\_  
Date Signed