



State of New Mexico
ENVIRONMENT DEPARTMENT
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July 1, 1996

Mr. G. Thomas Todd
 DOE/LAAO
 538 35 th Street
 Los Alamos, New Mexico 87544

Re: Notice of Deficiency for RFI Report on SWMU 0-030(g)
 Los Alamos National Laboratory (NM0890010515)

Dear Mr. Todd:

The New Mexico Environment Department has reviewed the RFI Report dated November 13, 1995, for solid waste management unit 0-030(g) at Los Alamos National Laboratory (LANL) and found it to be deficient. While the site no longer poses a human health risk, it must still be evaluated with an ecological risk assessment. NMED requires that LANL to respond to specific deficiencies listed in Attachment A to this cover letter.

Should you or your staff have any questions concerning this extension approval please contact myself or Robert S. (Stu) Dinwiddie of my staff at the above address or by telephone at (505) 827-1561.

Sincerely,

Benito J. Garcia
 Benito J. Garcia
 Bureau Chief, HRMB

cc: Joe Vozella, DOE LAAO
 Ted Taylor, DOE LAAO
 [REDACTED]
 Barbara Hoditschek, NMED
 Robert S. (Stu) Dinwiddie, NMED
 File



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7/29/96

G. Allen
 D. McInerney

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Attachment A
Notice of Deficiency
RFI Report, TA-0, SWMU 0-030(g)

1.2.3 Hydrology:

LANL makes the statement that contamination from this site cannot affect ground water which is not substantiated by information in the paragraph. When in operation this outfall may have affected surface water in Acid Canyon, then may have infiltrated alluvial ground water which may be interconnected to other perched zones. LANL might substantiate the statement that this site probably did not affect the main aquifer.

2.3.2 Methods for Comparing Site Data with Background Data, p. 15:

NMED does not agree with the use of an upper tolerance limit (UTL) for each background constituent (based on the estimated 95% upper confidence bound of the 99th percentile of the constituent's background concentration distribution) was calculated, the actual conclusions reached for this site would not be modified based on a recalculation of the UTL values.

3.3.4 Comparison with Ecotoxicological Screening Action Level, p. 18:

LANL must reevaluate the ecological risk from this site based on agreements with NMED. The ecological risk approach outlined here was not approved by NMED or EPA prior to NMED being authorized for Corrective Action. Reevaluation, and submission of Eco-Risk evaluation, must take place within ninety (90) days of receiving final guidance from NMED on the factors to be considered in the Ecological Risk Assessment.

4.4.3 Human Health Screening Assessment, p. 37:

LANL must evaluate the risk remaining at the site based on confirmation sampling or contaminants left in place. Based on the information presented, in the RFI Report, it does not appear that a human health risk remains at this site; however, an ecological risk assessment must be conducted, and the results submitted, within ninety (90) days of reaching an agreement on the approach by all involved parties, NMED, LANL, and EPA. No response required at this time.

5. NMED requires DOE/LANL to address all levels of polychlorinated biphenyls above .9 mg/kg in any drainage areas and decontamination will be completed to .5 mg/kg if those PCBs are in a watercourse. The surface drainage area will need to be included in the ecological risk assessment for this area. Any remediation activities at this site must address these values.

6. LANL needs to provide the tabulated information from the confirmation sampling which was conducted in order to document completion of the excavation.

7. NMED also requires that raw lab data be submitted for verification of validation process.