

remove any solid waste management units (SWMU) from the permit. The Permittees are also reminded that only a portion of SWMU 21-021 was investigated as part of an Interim Action and that portions of SWMUs cannot be removed from the permit.

DOE Response 1

NMED understands that sampling of the surface soils for VOCs would probably be a fruitless effort at SWMU 0-030(b). However, a depth of 2-5 feet is considered the subsurface where, the Permittees have admitted, the contaminant releases occurred. In keeping with NMED's position paper entitled "Determination of Extent of Contamination", the Permittees must collect samples deeper than the 2-5 foot depth to adequately determine nature and extent of contamination. According to the VCA Completion Report, contaminants were detected above background levels (inorganics) and practical quantitation limits (organics). Because the source of contamination at this site was a liquid waste and given the characteristics of the tuff (e.g., fractures), contamination is expected at depths below the leachfield, and not in the overlying soil and fill. Again, the Permittees must determine the full extent of contamination at this site before drawing conclusions and making recommendations. The Permittees failed to meet their own objectives as stated in Table E-3.2-6 of the VCA Plan, regardless of the identified depths. NMED requires the Permittees to sample the locations previously sampled (see the VCA Completion Report) at the 2-5 foot interval and deeper, if necessary. The samples shall be analyzed for VOCs, SVOCs, metals, PCB, and pesticides.

(Note: The VCA Completion Report does not indicate that there were samples collected in the leachfield during the previous sampling activities even though the VCA Plan states that this data is available. The Permittees shall include this data, if available, in its assessment.)

DOE Response 2

The Permittees cannot conclude that there is no unacceptable risk from residual contamination at SWMU 0-030(m) when all of the appropriate analyses were not performed. The Permittees do not provide data from a metals analysis other than the TCLP metals data. In addition, the usability of the waste characterization sample that was collected is questionable. If this sample was composited (as waste characterization samples tend to be), the results of the analyses may not be used to characterize the site and, therefore, additional samples need to be collected. Alternately, NMED reiterates its recommendation to remove all remaining piping, sample the soil/tuff beneath the removed piping, and complete the remaining sampling and trenching of the tank area (see VCA Plan)

(Note: If the extent of contamination at tank area was defined, the Permittees would not have identified it as a data gap.)

DOE Response 4

The Permittees must determine the vertical and lateral extent of contamination at this site before drawing conclusions about risk to human and ecological receptors at this site. Many inorganic constituents were detected above their respective background levels. The deepest sample collected was 6 inches below the ground surface in an area that has been recontoured and regraded in the past. NMED questions whether the samples represent the highest levels of contamination at the site and disagrees that the extent of contamination has been determined. The Permittees shall resample the locations in the VCA Report at depth to determine the extent of contamination.

Should you have any questions, please feel free to contact Ms. Darlene Goering of my staff at (505) 428-2548.

Sincerely,



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SYM dxg

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