



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544



MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 24, 1997

Mr. G. Thomas Todd, Area Manager
Los Alamos Area Office
Department of Energy
528 35th Street
Los Alamos, New Mexico 87544

Dr. Sigfried Hecker, Director
Los Alamos National Laboratory
P. O. Box 1663, Mail Stop A100
Los Alamos, New Mexico 87545

RE: Request for Supplemental Information
Voluntary Corrective Action Plan
Area of Concern C-0-043
Los Alamos National Laboratory
NM0890010515

Dear Mr. Todd and Dr. Hecker:

The RCRA Permits Management Program (RPMP) of the New Mexico Environment Department has reviewed the Voluntary Corrective Action Plan (LA-UR-97-301) for Area of Concern (AOC) C-0-043, dated December 19, 1996 and referenced by EM/ER:97-023, and requests supplemental information detailed in the attachment. The RPMP is currently conducting a Class I permit modification and is considering the addition of AOC C-0-043 and associated sewer lines to the HSWA Module.

LANL must respond to the request for supplemental information within thirty (30) days of the receipt of this letter. If LANL does not submit a complete response to this request within thirty (30) calendar days, LANL should be advised that a Notice of Deficiency will be issued.



6933

1/1071/0
HSWA LANL

TL

Mr. Todd and Dr. Hecker
Sep 24, 1997
Page 2

Should you have any questions regarding this letter, please contact me or Mr. John Kieling, HRMB's LANL Facility Manager, at (505) 827-1558.

Sincerely,


Robert S. ("Stu") Dinwiddie, PH. D., Manager
RCRA Permits Management Program

RSD:kth

attachment

cc w/ attachment:

T. Baca, LANL EM-DO, MS J591
T. Davis, NMED HRMB
B. Garcia, NMED HRMB
T. Glatzmaier, LANL DDEES/ER, MS M992
K. Hill, NMED HRMB
J. Jansen, LANL EM/ER, MS M992
M. Johansen, DOE LAAO, MS A316
J. Kieling, NMED HRMB
M. Leavitt, NMED GWQB
H. LeDoux, DOE LAAO, MS A316
D. McInroy, LANL EM/ER, MS M992
D. Neleigh, EPA 6PD-N
J. Parker, NMED DOE OB
G. Saums, NMED SWQB
T. Taylor, DOE LAAO, MS A316
S. Yanicak, NMED DOE OB, MS J993
File: Reading and HSWA LANL 1/1071/0
Track: LANL, doc date, NA, DOE/LANL, HRMB/kth, RE, file

ATTACHMENT
Request for Supplemental Information
Voluntary Corrective Action Plan
C-0-043
December 19, 1996

General Comments:

1. LANL should clarify if the manhole is a vertical pipe/conduit extending downward from the ground surface and connecting to a below-ground horizontal sewer pipe.
2. LANL should clarify the potential environmental problems associated with this PRS. Indicate if the manhole overflowed and if waste was directly deposited into the manhole.

Specific Comments:

1. Page 1, Operational History: LANL should clarify if waste was placed directly into the manhole or whether waste placed into the sewer line passed through the manhole.
2. Page 4, Site Characterization: LANL should explain if the connecting sewer lines have been removed or if the manhole is currently isolated from the system. Indicate the PRS number associated with the sewer lines and, also, provide a figure indicating the surrounding PRSs in the vicinity of the Catholic Church.

**Request for Supplemental Information
Voluntary Corrective Action Plan
Area of Concern C-0-043
December 19, 1996**

This document responds to a letter titled, "Response to Request for Supplemental Information, Voluntary Corrective Action (VCA) Plan, C-0-043 dated December 19, 1996, for Los Alamos National Laboratory LA-UR-97-301," from the New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) to the Los Alamos National Laboratory Environmental Restoration (ER) Project. The VCA plan was executed in December of FY97 with the concurrence of DOE. The responses to NMED comments are presented here to explain the rationale stated in the plan and will include the actual conditions found during the execution of the corrective action. To facilitate review of this response, NMED's comments are included verbatim. The comments are divided into general and specific categories as presented in the letter. The Laboratory's responses follow each NMED comment.

General Comments

1. LANL should clarify if the manhole is a vertical pipe/conduit extending downward from the ground surface and connecting to a below-ground horizontal sewer pipe.

LANL Response

The type of construction of Potential Release Site (PRS) C-0-043 was confirmed after excavation of the manhole to be brick and mortar laid on an 8 in. thick concrete base. A cross section of the manhole, developed after removal and incorporated in the VCA Report for PRSs 0-030(d,k) and C-0-043 (LA-UR-97-3318) submitted in September of 1997, is included in Attachment 1. Please refer to the VCA report for a complete description the results of the corrective action.

General Comments

2. LANL should clarify the potential environmental problems associated with this PRS. Indicate if the manhole overflowed and if waste was directly deposited into the manhole.

LANL Response

There is no known release from overflows or from waste deposited in the manhole directly. This is based on archival review of available information. Additional information is included in the VCA Report for PRSs 0-030(d,k) and C-0-043.