

HSWA LANL (107410/0-030(g)) B



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**

May 12, 1998

Mr. Theodore Taylor, Program Manager
Los Alamos Area Office
Department of Energy
528 35th Street, MS A316
Los Alamos, New Mexico 87544

Dr. John C. Browne, Director
Los Alamos National Laboratory
P. O. Box 1663, Mail Stop A100
Los Alamos, New Mexico 87545

**RE: Request for Supplemental Information
RFI Report on SWMU 0-030(g)
Los Alamos National Laboratory
NM 0890010515**

Dear Mr. Taylor and Dr. Browne:

The RCRA Permits Management Program (RPMP) of the Hazardous and Radioactive Materials Bureau has reviewed the RFI Report for Solid Waste Management Unit (SWMU) 0-030(g), dated September 1995, referenced by LA-UR-95-3263 and Response to the NOD dated March 6, 1997, referenced by EM/ER: 97-046 and found them to be insufficient. Los Alamos National Laboratory (LANL) must respond to the request for supplemental information contained in Attachment A within thirty (30) calendar days of the receipt of this letter.



7003

TL

Mr. Taylor, Dr. Browne
May 12, 1998
page 2

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

Sincerely,


Robert S. (Stu) Dinwiddie, Ph.D., Manager
RCRA Permits Management Program
Hazardous & Radioactive Materials Bureau

RSD:ND

cc w/attachments:

J. Canepa, LANL EM/ER, MS M992
J. Davis, NMED SWQB
B. Garcia NMED HRMB
M. Johansen, DOE LAAO, MS A316
J. Kieling, NMED HRMB
S. Kruse, 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
S. Yanicak, NMED DOE OB, MS J993
File: Reading and HSWA LANL 1/1071/0/0-030(g)
Track: LANL, 5/12/98, NA, DOE/LANL, RPMP/Dinwiddie, RE, File

ATTACHMENT A
Request for Supplemental Information
RFI Report for Solid Waste Management Unit
Response to Notice of Deficiency
0-030(g)

Comments:

1. LANL shall develop a new Sampling and Analyses Plan (SAP) to define the nature, rate and extent of contamination beneath the former septic tank, vitrified clay pipe (VCP) and outfall area to the point where Canyons investigation begins. The contamination has not been delineated e.g. plutonium, americium and PCBs were found in the last sample (AAB3580) taken downstream from the outfall. Further investigation should be done to determine the lateral and vertical extent of contamination. Lead, chromium and nickel were found above background values beneath the outfall VCP which suggests a release(s) (e.g. AAA4375) to the environment. It does not appear to the RPMP that the extent was delineated beneath the VCP. As part of the new SAP(s) LANL shall perform storm water sampling in the drainage channel and Acid Canyon to the former TA-45 outfall.

2. Include the SOP methodology for the kinetic phosphorescence analyses for total uranium with the detection limit/quantitation limit for this technique for different matrices (water, soil, tuff/rock). Clarify what methods were used for the digestion of the samples for all inorganic analyses (i.e. nitric or hydrofluoric acid).

3. Clarify if any samples used in determining nature, rate and extent of contamination as well as the confirmatory samples were composited. Table A-1, Appendix A, suggests that sample AAA1909 was composited as it was collected between 3.0 and 8.0 feet bgs (below ground surface).

4. Clarify the matrix of samples, whether soil, sediment, fill or tuff and provide the information on grain size, total organic carbon content (estimated or determined) of the soil, sediment and fill samples. The report indicates that the septic tank was excavated in tuff and the clay pipe may also have been located in the tuff and not in the soil.

Mr. Taylor, Dr. Browne
May 12, 1998
page 4

5. The report did not address if any cracks or fractures were observed in the tuff beneath the septic tank and clay pipe. Provide any pictures or videos taken at the time of excavation of the septic tank and VCP to determine the presence of cracks or fractures in the tuff.
6. LANL shall provide rationale for performing limited suite analyses (e.g. mercury and lead only) at certain locations and performing a more complete suite (all detected COPCs) at other locations, when a variety of COPCs has been positively identified in the contents of the septic tank and outfall area (e.g. plutonium, chromium, PCBs etc.). A representative suite of analyses shall be completed especially on the confirmatory samples.
7. It is likely the waste in the septic tank was the source of PCBs detected during confirmatory sampling. In addition, a surface sample which contains PCBs slightly less than the SAL (1ppm) indicates the need for subsurface characterization.
8. LANL states in the executive summary and in the conclusions that "Moreover should further migration occur, the chemicals' concentrations will decrease even more because of surface runoff dilution." This approach to corrective action is not acceptable to RPMP.
9. Once the nature and extent of the contamination has been defined, both Human Health and Ecotoxicological Screening Assessments should follow procedures described in the Risk Based Decision Tree.
10. If available, please provide any "As-built" plans for the septic tank.

File:c:neelam\prs0-030(g)