



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

HSWA LANL
5/21/98

TA-00

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

May 22, 1998

Mr. Theodore Taylor, Program Manager
Los Alamos Area Office
Department of Energy
528 35th Street, MS A100
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 to the Voluntary Corrective Action (VCA)
Completion Report for SWMUs 0-030(l), 0-030(m), 0-033(a)
Los Alamos National Laboratory (LANL) EPA I.D. NM0890010515**

Dear Mr. Taylor and Dr. Browne:

The RCRA Permits Management Program (RPMP) of the Hazardous and Radioactive Materials Bureau (HRMB) has reviewed the Voluntary Corrective Action Completion Report for SWMUs 0-030(l), 0-030(m), 0-033(a), dated August 1996, and found it to be insufficient. LANL must respond to the request for supplemental information (Attachment A) within thirty (30) calendar days of receipt of this letter. If DOE/LANL does not submit a complete response to the request for supplemental information within thirty (30) calendar days a Notice of Deficiency will be issued.

Should you have any questions regarding this matter, please contact me or Mr. John Kieling,

Th



7007

Mr. Todd, Dr. Browne
May 22, 1998
page 2

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:rw

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. Plum, DOE LAAO, MS A316
J. Parker, NMED DOE OB
S. Yanicak, NMED DOE OB, MS J993
File: Reading and HSWA LANL 5/1144/49/0-030(l), 0-030(m), 0-033(a)
Track: LANL, 5/22/98, NA, DOE/LANL, RPMP/Dinwiddie, RE, File

ATTACHMENT A
Request for Supplemental Information
Voluntary Corrective Action Completion Report for Potential Release Sites
0-030(l), 0-030(m), 0-033(a), 6th Street Warehouse

GENERAL COMMENTS:

1. LANL shall present the data in table format to include the following items (or follow the data reporting requirements as described in the HRMB standard operating procedure (SOP) RFI Report Annotated Outline):
 - a) The table shall include sample numbers, all environmental sample analytical results, detection limits, qualifiers for the environmental samples that were in each QC batch, all non-detectable concentrations or practical quantitation levels and qualified data;
 - b) The table shall contain appropriate background concentrations for metals and radionuclides as approved in the current "Inorganic and Radionuclide Background Data for Soils, Canyons Sediments and Bandelier Tuff at Los Alamos National Laboratory" (Ryti, R.T., P.A. Longmire, D.E. Broxton, S.L. Reneau, and E.V. McDonald); and
 - c) The table shall provide QC results associated with each batch (e.g., method blanks, internal standards, matrix spikes, matrix spike duplicates, performance assessment samples, surrogate recoveries).
2. UTLs are greater than approved site-wide background levels in most cases for inorganics and radioactive isotopes.

LANL shall compare analytical results to appropriate background concentrations as listed in the Ryti, *et al*, document referred ton in comment number 1 (b) above.
3. Volatile organic compounds (VOCs) were analyzed in waste characterization samples only. Solvents were present historically at the materials testing facility.

LANL shall investigate for VOCs.
4. No comments are included on the risk assessment portion because determination of nature and extent of contaminants of potential concern was incomplete.

LANL shall follow the risk assessment requirements as described in the HRMB standard operating procedure (SOP) Risk-based Decision Tree.

5. Deviations from the workplan such as not performing the soil gas survey or conducting coring were not approved by NMED. All significant/substantial workplan deviations shall be approved in advance (see attached Hazardous and Radioactive Materials Bureau, New Mexico Environment Department, Position Paper - Variances from Approved Workplans).

"Examples of significant deviation from a workplan include (1) the addition of a substantial area to the AOC/SWMU . . .; and/or (2) a decrease in the number of samples and/or analysis is proposed" (Hazardous and Radioactive Materials Bureau, New Mexico Environment Department, Position Paper-Accelerated Corrective Action Approach, March 4, 1998).

NMED will not approve a deviation from the soil gas survey as described in the workplan. The purpose of the survey was to help determine the presence or absence of organic vapors (not the location of septic system structures) to aid in maximizing additional sampling locations. Coring may or may not be required depending on the results of soil gas survey.

SPECIFIC COMMENTS:

PRS 0-030(I):

1. HRMB is satisfied with the sampling and removal of the tank and the inlet piping to the septic tank. **However, HRMB requires that all confirmatory soil samples be off-site laboratory analyzed, not XRF analyzed.**
2. HRMB is not satisfied with the sampling performed in the outfall area of this PRS for the following reasons:
 - (a) Samples were only taken to a six-inch depth, therefore, the site was not adequately characterized;
 - (b) Samples were not analyzed at an off-site laboratory. The use of XRF analyses is not acceptable for determining the horizontal and vertical extent of contamination in RFI investigations;
 - (c) Only two (2) sample locations are downgradient of the outfall;
 - (d) The two samples taken were forty (40) feet from the outfall and were taken

within five (5) feet of each other; and,

- (e) It is not clear whether the samples were taken in the drainage way of the outfall effluent.

Therefore, LANL shall submit a sampling plan that addresses the above concerns about outfall sampling.

PRS 0-30(m):

- 3. Confirmation samples for organics taken underneath the septic tank and underneath the pipeline were not analyzed at an off-site laboratory. The use of XRF analysis data alone without performing any off-site analytical laboratory analysis is unacceptable. Also, the investigation samples taken underneath the exiting pipe used only XRF analysis, with no off-site laboratory analysis. Again, this is unacceptable.

Did the PRS have an outfall? If yes, please describe location and proposed sampling.

LANL shall submit a new sampling plan that addresses the above concerns about the confirmation sampling performed underneath the septic tank and the pipeline.

PRS 0-033(a):

- 4. NMED UST Bureau site assessment report was not attached in Appendix B nor does Appendix E include the Transmittal of Underground Storage Tank Closure Form and Tank Closure Work Sheet.

LANL shall provide these missing documents.

- 5. LANL shall include the analytical sampling results at this PRS, not just sampling locations.
- 6. LANL shall sample for BTEX in UST soil samples.