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MEMORANDUM

TO: File
Terry Rust, Team Leader, LANL ER *TR 1/22/02*

FROM: Vickie Maranville, Environmental Scientist/Specialist O *(VMM) 1/22/02*

SUBJECT: **RECORD OF COMMUNICATION FOR INFORMAL COMMENTS FOR THE VCA COMPLETION REPORT FOR CONSOLIDATED UNIT 00-003-99 (PRS 0-003 AND PRS 0-012) AND PRS 0-030(i)**

DATE: January 15, 2002

The following comments for VCA Completion Report for Consolidated Unit 00-003-99 (PRS 0-003 and PRS 1-012) and PRS 0-030(i) are based on the New Mexico Environment Department (NMED) Hazardous Waste Bureau (HWB) review of the above referenced document. Terry Rust, Team Leader, LANL ER has provided clarification to HWB comments. This communication record clarifies and documents NMED HWB comments and the LANL ER Response to comment for the NMED HWB Administrative Record. A copy of this record of communication will be inserted into the NMED HWB Administrative Record.

1. HWB Comment: Executive Summary, page IV

“PAHs are not related to a release from the PRS.”

This statement is speculative. It should be noted that PAHs were detected at the site, however they do not pose an unacceptable risk.

LANL ER Clarification:

The PAHs were determined to be a result of the asphalt and its underlying sealing layer of oil and were not related to a release from the containers stored.

2. HWB Comment: Executive Summary, page IV

“Although concentrations of these COPCs were elevated, additional information, other sample results, and process knowledge concluded that these concentrations were not a result of a release from the PRS.”



clarify and explain that COPC were detected, but do not exceed SALs. Barium, cobalt, lead, and manganese were detected in some of the samples collected during investigation activities. Although detected they do not pose an unacceptable risk.

LANL ER Clarification:

These COPCs were detected in a duplicate sample at depth and were not repeated in the other duplicate, in the sample collected at a shallower depth, in the tank contents nor were they identified in the expected process chemicals. Further, the identified COPCs were all well below SAL with only two at approximately 1/10 SAL and the rest well below that level.

3. HWB Comment: Executive Summary, page VI

“This VCA completion report closely follows the organization and content of the annotated RFI report outline agreed upon by the Laboratory’s ER Project and NMED dated June 12, 1998 (LANL 1998, 58605).”

The annotated outline is meant to provide guidance. The VCA completion report does not need to contain all the elements of the annotated outline. In addition, the above statement is repeated again in the introduction (page 1). In order to streamline report submittal repetition should be avoided and only relevant sections of the annotated outline included. In addition, the VCA Plan is included as an attachment to the report (page 3), the plan does not need to be included in the final report since it has already been submitted to HWB, reviewed, and approved.

LANL ER Clarification:

Thank you, future reports will reflect this efficiency.

4. HWB Comment: Table 3.4-3 PRS 0-012

In the table, extent of lead in the subsurface is not defined. Based on the data provided in the VCA Completion Report, lead appears to be defined for the PRS. Please clarify is lead is defined in the subsurface at PRS 0-012.

LANL ER Clarification:

Extent for Lead has been defined for this PRS

5. HWB Comment: Site Assessment, page 45

“These screening assessments follow the HRMB risk-based...”

HRMB should be changed to HWB.

LANL ER Clarification:

The HRMB reference was used to specify the decision document being used, however, the appropriate bureau nomenclature will be used in future reports.

6. HWB Comment: Conclusions and Recommendations, page 53

“Although the vertical extent of barium, cobalt, lead, and manganese at a depth of 11.5 to 12 ft beneath the outlet pipe has not been defined, these inorganic chemicals are not considered to be the result of a release from the PRS.”

This comment is again related to comments 1 and 2 above. Since the COPCs were detected, do the concentrations pose a risk and based on all the sample results, has extent of the COPCs been defined.

LANL ER Clarification:

As noted in Comment 2, these COPCs were detected in a duplicate sample at depth and were not identified in the other duplicate, in the sample collected at a shallower depth, in the tank contents nor were they identified in the expected process chemicals. Further, the identified COPCs were all well below SAL with only two at approximately 1/10 SAL and the rest well below that level. Since these anomalous detects were found at ~12 ft bgs, beneath an asphalt roadway/parking area, and are isolated and inconsistent with any expected releases from the PRS, it has been determined that they pose no unacceptable risk.

7. HWB Comment: Inorganic Chemical Comparison with Background Levels, page 71

Chromium and Silver were not retained as COPCs because the sample location is a non-PRS location. If silver and chromium were sampled for and detected they must be retained as COPCs. Why were the sample locations picked and sampled if the data was not going to be used or related to the PRS.

LANL ER Clarification:

This sample was taken to verify if potential contaminants found down gradient from the septic outfall were the result of PRS discharges or from outside influences such as the nearby patrol road and hiking trail or Trinity Drive which discharges runoff into this drainage. The results of this sample, coupled with the sampling results from the PRS, indicate that the COPCs in question originate from outside influences (such as Trinity Drive and/or the Old Patrol Road) rather than from PRS discharges. As such, it was determined that they should not factor into the risk determination for the PRS.

8. HWB Comment: Nature and Extent of Contamination, page 88

“Lead was detected in soil above the background value and the background range four times. For one of those four samples (location 00-04791, sample 0100-96-0221), there is no deeper sample at this location, so vertical extent cannot be determined.”

The vertical extent of lead concentration does not appear to be defined vertically at the sample locations. However, based on the results of this investigation has lead been defined vertically at this PRS.

LANL ER Clarification:

At this location the inlet line to septic tank 00-030(i) was open and exposed to external influences. When compared to sample results downstream from the exposed piping and from the tank and discharge line, it was determined that these results were not indicative of a release from the PRS but rather indicate run on influences from nearby Trinity Drive or other sources. The decreasing trend as you approach the PRS indicates the source is not the PRS. As such, it was decided that further characterization of these non-PRS results was not warranted.

9. HWB Comment: Data Evaluation and COPC Identification Process, page 96

“The primary uncertainty associated with the identification process is the possibility that a chemical may be inappropriately identified as a COPC for evaluation in the risk screening assessment; that is, a detected chemical may be inappropriately excluded or included as a COPC. Such may be the case with the PAHs... These chemicals, while detected at the site, may have come from a source other than PRS 0-030(i).”

PAHs were detected at the PRS during the investigation. Based on the information provided in the VCA Completion Report, the PAHs are related the asphalt pad at the site and not a release from the site. Please explain that PAHs were detected at the site, they are below SALs or action levels, and the source of the PAHs (i.e. the asphalt pad). In addition, please clarify if PAHs were detected PRS-wide or only in the vicinity of the asphalt pad.

LANL ER Clarification:

The detected PAHs were retained as COPCs because the possibility could not be completely eliminated that they came from the PRS (00-030(i)). However, since they were also detected at comparable, or higher, levels in the non-PRS sample, it is also possible that they resulted from outside influences and was inappropriately included as COPCs. Thus the reason for including this statement in the "uncertainty analysis".

HWB Comment to LANL Response:

HWB agrees that the sample location identified as a “non-PRS” sample is in fact not from PRS 00-030(i) rather from a drainage outside the PRS boundary.

10. HWB Comment: Ecological, page 105 (second paragraph)

“*T&E Species.*”

This sentence appears to be a fragment or possibly a heading inserted within the text.

LANL ER Clarification:

This does appear to be an embedded subheading, future reports will better clarify the subject headings.

11. HWB Comment: Conclusions and Recommendations, page 113

“Extent of contamination has been defined laterally, but not fully vertically for aluminum (at one location), barium (at one location), and lead (at two locations).”

This statement is misleading; please clarify if extent of aluminum, barium, and lead has been defined for the PRS.

LANL ER Clarification:

This statement should better indicate that contaminant extent is defined for the PRS; however, at isolated locations, and for individual COPCs within the PRS, there may not be specific indication of a decreasing trend. This was not made adequately clear in the text. Extent was found to be defined and subsequent screening indicated that no unacceptable risk remains at the site.