TA-00

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 3, 2002

Mr. Everett Trollinger, Project Manager
Office of Los Alamos Site Operations
Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, NM 87544

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

RE: REQUEST FOR SUPPLEMENTAL INFORMATION VOLUNTARY CORRECTIVE ACTION PLAN FOR POTENTIAL RELEASE SITES (PRSs) 0-030(b)-00, 0-027, 0-030(a), 0-029(a,b,c), 0-010(a,b), AND 0-033(a); AND THE INTERIM ACTION AT PRS 21-021 LOS ALAMOS NATIONAL LABORATORY, NM0890010515 HWB-LANL-02-010

Dear Mr. Trollinger and Dr. Browne:

The Hazardous Waste Bureau (HWB) of the New Mexico Environment Department has reviewed the Voluntary Corrective Action Plan for PRSs 0-030(b)-00, 0-027, 0-030(a), 0-029(a,b,c), 0-010(a,b), and 0-033(a), and the interim action at PRS 21-021 dated June 2002 and referenced by LA-UR-02-1081 (ER2002-0094). HWB requests supplemental information as detailed in the attachment.

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

Sincerely,

John Young
LANL Corrective Action Project Leader
Permits Management Program

JY:dxg

cc: J. Bearzi, NMED HWB
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D. McInroy, LANL RRES/ER, MS M992
file: Reading and LANL TA:0 (Land Transfer, DP Road, 6th Street Warehouse, SWMU 21-021)

HWB Comment: Even though LANL was unable to sample the drainage in DP Canyon, date exist from several reaches in DP Canyon that can be used instead. LANL shall determine if data for reach DP-1W sediments are appropriate to use to determine the extent of contamination from this PRS in the drainage (for example, if there are no other upgradient PRSs). LANL shall use this data in its human health and ecological risk assessments.

3. Section 2.5 Non-HSWA PRSs near the 6th Street Warehouses [PRSs 0-010(a) and b) and 0-033(a)], page 57:

LANL Statement: "PRSs 0-010(a and b) and PRS 0-033(a) are grouped together because they are non-HSWA PRSs that will not have additional sampling."

HWB Comment: PRS 0-033(a) is a HSWA PRS and is on Table A of the HSWA module.

4. Section 4.2.1 Installation of SVE Wells, page 68, paragraph 2:

LANL Statement: "Due to the nature of the tuff at the PRS 0-027 site, it is difficult to predict the ROI that will be induced by [soil vapor extraction] wells before site-specific testing has been performed. Because of the non-homogeneous distribution of fractures in the tuff, it is likely that different radii of influence will be induced by individual wells."

HWB Comment: Since LANL admits that the radius of influence of vapor extraction cannot be predicted, LANL shall consider drilling one extraction well and the monitoring wells and then conducting the pilot test before installing the other two extraction wells. LANL shall also explain how it expects to recovers volatile organics outside of the fractures since the SVE system will preferentially withdraw air from the fractures.

5. Section 4.2.3 System Pre-operation Data Collection, page 70, paragraph 2:

LANL Statement: "The samples will be analyzed for TPH and BTEX by EPA methods 8015B and 8260B, respectively."

HWB Comment: Assuming that this is a gasoline-only release, the TPH analysis should be for gasoline-range organics (GRO by EPA Method 8015M) (See HWB's Draft Position Paper *Use of Total Petroleum Hydrocarbon (TPH) Test Results for Site Characterization*, dated July 2000).

6. Section 4.3.1 SVE Pilot Operation, page 70, paragraph 2:

HWB Comment: LANL shall add the following to the list of data collected during the pilot operation:

- full-system vacuum pressure,
- air flow velocity measurements,

ATTACHMENT

General Comments

1. LANL is proposing a no further action (NFA) under criterion 5 for PRS 0-030(a) on the basis of human health and ecological screening assessments using data presented in a Voluntary Corrective Action (VCA) report. At this time, HWB cannot approve a NFA for this site. It appears that contamination in reach DP-1W of DP Canyon is potentially derived from this septic system. LANL shall present and evaluate in the conclusions of the final report for this VCA the data collected in reach DP-1W.

2. LANL is proposing a NFA under criterion 4 for PRS 0-033(a) on the basis that the site is regulated and has been remediated under another state authority (Underground Storage Tank regulations). At this time, HWB cannot agree with this request for two reasons. The VCA Completion Report for this site does not include the site assessment report detailing the closure activities for the fuel oil tank or the post-removal confirmatory data. In addition, the VCA Completion Report states that a "larger ecological exposure unit" will be considered once all information is obtained from the surrounding PRSs. This has not been completed yet.

Specific Comments

1. Section 1.2 Regulatory History, page 6, paragraph 1:

LANL Statement: "Depending upon the type of contaminant(s) and the history of a PRS, either the New Mexico Environment Department (NMED) or the DOE has administrative authority over work performed by the ER Project."

HWB Comment: PCB spill, cleanup, and disposal is regulated by the Toxic Substance Control Act (TSCA), the Comprehensive Environmental Response, Compensation, and Liablity Act, the Resource Conservation and Recovery Act, and, in some case, the Clean Water Act and the Clean Air. The U.S. EPA has established regulations for and has the authority over PCB spills and cleanup at LANL. In no case does the DOE have the authority to regulate this activity at LANL. LANL must get concurrence from the EPA prior to proposing these sites for NFA.

2. Section 2.1.2.2 PRS 0-030(a),Previous Field Investigations, page 36, paragraph 3:

LANL Statement: "The outfall from the septic tank to the drainage in DP Canyon was not sampled, but a sample was collected beneath the outlet pipe location adjacent to the septic tank. The outfall was not located due to the depth of the septic tank and the outlet pipe and to the amount of fill covering this area."

- individual extraction well flow velocity measurements (if testing multiple wells), and
- individual well and full system extraction concentrations (as measured either by a PID with a minimum 10.6 eV lamp or a combustible gas indicator).

7. Section 4.3.2.4 Operation of SVE System, page 72, paragraph 3:

LANL Statement: "Following a period of continuous active operation, system operation may be terminated or converted to an active pulsed operation, active of passive bioventing, or barometric pumping operation."

HWB Comment: LANL shall not consider "passive bioventing" as an option.

8. Section 5.0 Confirmatory Sampling, page 72, paragraph 1:

LANL Statement: "The final plan for confirmatory samples will be refined over time, but the current expectation is that confirmatory samples will be collected from seven new boreholes, drilled near the previous SVE and monitoring well boreholes. Confirmatory samples will be collected from the same depths as the previous samples to document whether the SVE system effectively reduced the COPCs."

HWB Comment: LANL shall drill boreholes for confirmatory sampling at locations that are not near the extraction wells. Soil grain size (fine-grained soils) and field screening shall be used to determine the soil sampling depths selected for chemical analyses.