



BILL RICHARDSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us



RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

October 5, 2005

David Gregory
Federal Project Director
Los Alamos Site Office
Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, NM 87544

David McInroy
Remediation Services Deputy Program Director
Los Alamos National Laboratory
P.O. Box 1663, Mail Stop A100
Los Alamos, NM 87545

RE: SECOND NOTICE OF DEFICIENCY
COMPLETION REPORT FOR THE VCA AT SWMUs 0-030(a), 0-030(b)-00, AND
0-033(a) AND AOCs 0-029(a,b,c) AND 0-010(a,b) AND FOR THE IA AT SWMU
21-021-99 (COMPLETION REPORT)
LOS ALAMOS NATIONAL LABORATORY, EPA ID #NM0890010515
HWB-LANL-03-013

Dear Messrs. Gregory and McInroy:

The New Mexico Environment Department (NMED) is in receipt of the *Supplemental Response to the Notice of Deficiency for the Completion Report for VCA at SWMUs 0-030(l), 0-033(a), 0-030(a) and AOCs 0-004, 0-010(b), and 0-029(a,b,c)* (supplemental response), dated July 2005 and referenced by LA-UR-05-4990/ER2005-0175. NMED has reviewed this document and hereby issues this second notice of deficiency. The University of California and the Department of Energy (collectively, the "Permittees") must provide the requested information within 30 days of receipt of this letter.

In the supplemental response, the Permittees provided data for inorganic chemicals detected above background values and summarized revised risk assessments for these sites. The



7750

Messrs. Gregory and Mc...oy

October 5, 2004

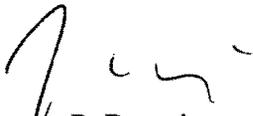
Page 2

Permittees must provide all of the data (including non-detected values, detection limits, and minimum detectable activities) and the actual risk assessments in addition to figures depicting new sample locations and any excavated areas. While, the Permittees calculated the total dose from radionuclides for part of SWMU 21-021-99, the Permittees must calculate and report total risk from radionuclides as well as dose in accordance with the letter from Everet Beckner to Ron Curry regarding radionuclide data.

The Permittees have requested a no further action (NFA) determination from NMED for SWMU 0-033(a) (part of SWMU 0-033). The data from the underground storage tank removal and the contaminated underlying tuff revealed total petroleum hydrocarbon (TPH) contamination to 35 feet (as reported in the 45-day report). Residual contamination remains at a depth of 11 feet following tank and soil removal. In order to grant a NFA determination for SWMU 0-033 (including AOC 0-033(b), NMED must assess the human health risk for this site given the remaining contamination. The Permittees must include the TPH data in a revised human health risk assessment (residential and construction worker scenarios). The Permittees must also resubmit "Enclosure Five" of the 45-day report because the logs are illegible.

Should you have any questions, please feel free to contact Darlene Goering at (505) 428-2542.

Sincerely,



James P. Bearzi

Chief

Hazardous Waste Bureau

JPB:dxg

cc: D. Goering, NMED HWB
J. Volkerding, NMED DOE OB
S. Yanicak, NMED DOE OB, MS J993
L. King, EPA 6PD-N
J. Ordaz, DOE OLASO, MS A316
K. Hargis, LANL RRES/DO, MS M591
N. Quintana, LANL RRES-RS, MS M992
file: Reading and ~~LANL~~: Land Transfer