



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P. O. Drawer 26110
Santa Fe, New Mexico 87502-0110
(505) 827-2855
Fax: (505) 827-2836



MARK E. WEIDLER
SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

July 2, 1998

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

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

**RE: Supplemental Information Request
TA 1, Aggregates N & P RFI Report
Potential Release Sites 1-001(s & u), 1-006(s) & 1-007(I)
Los Alamos National Laboratory
NM0890010515**

Dear Mr. Taylor and Mr. Browne:

The RCRA Permits Management Program (RPMP) of the New Mexico Environment Department's Hazardous and Radioactive Materials has reviewed the RCRA Facility Investigation Report (LAUR-97-3320) for TA 1, Aggregates N & P dated August 1997 and requests supplemental information as detailed in the attachment.

Also, NMED RPMP feels that removal of PRSs 1-001(s & u) from the HSWA Module of the RCRA Operating Permit is inappropriate. Portions of these PRSs have been proven to be contaminated; hence, NMED RPMP finds it likely that contaminated portions of this PRS/wasteline remain beneath Los Alamos residential and commercial buildings and other infrastructure. RPMP is open to discussing an approach to investigating and remediating these PRSs.

LANL must respond to the request for supplemental information within thirty (30) days of the receipt of this letter. If LANL does not submit a complete response to this request within thirty (30) calendar days, LANL should be advised that a Notice of Deficiency will be issued.

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Mr. Taylor and Mr. Browne
July 2, 1998
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Should you have any questions regarding this letter, please contact me or Mr. John Kieling, RPMP's LANL Facility Manager, at (505) 827-1558.

Sincerely,

Stephanie Kruse

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

RSD:kth

attachment

cc w/ attachment:

T. Baca, LANL EM, MS J591
J. Canepa, LANL EM/ER, MS M992
J. Davis, NMED SWQB
B. Garcia, NMED HRMB
K. Hill, 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
J. Vozella, DOE LAAO, MS A316
S. Yanicak, NMED DOE OB, MS J993
File: HSWA LANL HSWA LANL 1/1078/1/1-001(s & u) & 1/1078/1
Track: LANL, doc date, NA, DOE/LANL, NMED HRMB/Dinwiddie, RE, file

ATTACHMENT
Request for Supplemental Information
TA 1, Aggregates N & P RFI Report
August 1997

The following potential release sites were presented in this document: 1-001(s & u), 1-006(s) & 1-007(l).

General:

1. LANL failed to provide a complete set of the analytical results from the samples obtained as part of this corrective action. LANL should provide all field screening and analytical data (including QA/QC data) obtained during this investigation and/or used in support of this document.
2. LANL failed to perform risk screening per EPA guidance at PRSs 1-001(s & u). LANL should provide a revised risk evaluation for the entire wasteline system [both PRSs 1-001(s & u) together]. LANL may propose reasonable exposure scenarios for different portions of the PRS (e.g., the eastern and western portions of the wasteline may be evaluated using industrial and residential exposure scenarios, respectively).
3. Contrary to the approved RFI Workplan (RFI WP), LANL performed compositing of soil samples at various locations in this investigation. LANL should identify each instance in this document in which compositing occurred and evaluate the validity of the analytical results in comparison to the site decisions implemented (e.g., backfilling of excavations, obtaining samples for fixed laboratory analyses, etc.).
4. LANL failed to adhere to the approved RFI WP and to adequately characterize the site. Most notably, LANL investigated 6 out of 13 of the originally proposed "accessible" locations in Aggregate N. LANL should identify each variance from the approved RFI WP. For each variance, LANL should provide the rationale for the field decision to vary from the approved RFI WP and evaluate the impact of each variance on the integrity of the investigation.
5. LANL failed to provide logs and descriptions for soil borings conducted as part of this investigation. LANL should provide this information to support the RFI.
6. LANL inappropriately relied upon field screening methodologies to make field decisions (e.g., backfilling of excavations, etc.). LANL should provide an explanation of which field decisions were made based solely on field screening technologies. If subsequent analytical data were obtained, LANL should discuss whether or not the data support the implemented field decisions.

7. For each sampling location identified as being obtained "near" a manhole, LANL should clarify the position of the sample in relation to the manhole (i.e., 2 inches below the center of the manhole, 5 inches south of the center of the manhole, etc.).

Specific Comments:

1. PRS 1-001(s), Location 1A: LANL failed to obtain 2 soil samples per sampling location beneath the pipes as indicated in the approved RFI WP. At a minimum, LANL should have obtained samples from beneath the observed broken vitrified clay pipe (VCP).
2. PRS 1-001(s), Location 1A, page 43: Contrary to the approved RFI WP, LANL performed composite soil sampling outside the VCP. LANL should evaluate the analytical data obtained to determine the impact of the variance on the integrity of the investigation.
3. PRS 1-001(s), Location 1A, page 43: LANL inappropriately relied upon field screening methodologies (MCAL and XRF) to make field decisions (backfilling of excavations). LANL should discuss whether or not the analytical data obtained also supports the implemented field decisions.
4. Figure 5.1.4.1-3, page 44: LANL should indicate the actual sampling locations on this figure.
5. Figure 5.1.4.3-1, page 50: This figure should include the borehole locations discussed on page 41. In the legend, LANL should also clarify the meaning of the dotted lines and shading shown.
6. Figure 5.1.4.3-2, page 53: LANL should revise the figure and or provide further information in the text which clarifies the characteristics of the samples indicated in the figure. For instance, the reader is unable to correlate these samples with a sample identification number, depth, location (figure shows that the samples were not obtained from within any of the excavations), etc.
7. PRS 1-001(s), Location 2, page 59: LANL should clarify if discreet soil samples from boreholes 2-14 and 2-15 were obtained for fixed analytical laboratory analyses in support of the elevated beta/gamma readings noted during field screening.

8. Figure 5.1.5.2-1, page 62: LANL should clarify if the sampling locations outside the VCP are from beneath the pipe or adjacent to (along side) the pipe.
9. PRS 1-001(s), Locations 10 & 11, page 63: Table 5.1.5.2-2 omits several metals of concern. LANL must revise this Table to include chromium, nickel, arsenic, barium, vanadium and beryllium.
10. PRS 1-001(s), Location 13, page 65: Since the data presented in Table 5.5.5.3-2 indicates that the vertical extent of contamination has not been bounded, LANL should conduct additional sampling at this location.