

chamberlain, kathryn, NMENV

From: Becky-Coel Roback [becky_cr@lanl.gov]
Sent: Wednesday, March 01, 2006 5:06 PM
To: chamberlain, kathryn, NMENV
Subject: Responses, finally!

Katie--please see our responses below. I'd be happy to discuss any of these with you, now that I have gained some degree of familiarity with the sites!

Thanks,
 Becky

- 1) Based on information provided in the HIR and data from DOE OB, I think we are going require PCBs as part of the analytical suite for all sites. For example, 02-006(b) and 02-006(e) had Aroclor detects in 2000, but no subsequent sampling was conducted. Also, as you're aware, DOE OB has found PCBs in stormwater where they were not expected.
 - *We propose that PCB analyses be added to all sites at TA-2 except the following, which have very specific non-PCB sources of contamination identified:*
 - AOC 02-003(d), Garden hose discharge area and gaseous effluent vent line from delay system to mesa top stack
 - SWMU 02-005, Cooling tower drift loss
 - SWMU 02-006(a), French drain associated with mesa top stack
 - SWMU 02-009(a), Radioactively contaminated soil area behind storage building
 - SWMU 02-009(b), Radioactively contaminated soil area north of the stack-gas valve house
 - AOC 02-009(d), Radioactively contaminated soil area east of reactor building
 - AOC 02-012, Soils associated with underground fuel storage tanks
 - *The TA-21 non-deferred site samples already include PCB analyses; therefore, we are proposing no changes to the analytical suite.*
 - *We propose no changes to the analytical suite for TA-26 samples, because the TA-26 SWMUs are associated with a storage vault with no history of PCB use.*
- 2) Section 4.1.1, page 43: Why aren't you collecting samples beneath former Line 117? Were samples collected following the D & D? According to the HIR, only screening data was collected for radionuclides within the pipe trench.
 - *Line 117 used to run through AOC 02-009(d). A total of 4 locations are being sampled under this line, namely: BH3a-1, BH3a-2 (Figure 4.1-1), BH9d-3, and BH9d-4 (Figure 4.1-8). Clarification will be added to the text.*
- 3) I have included additional locations on Figure 4.1-3 for SWMU 02-004(a), WBR Area and 02-006(b), Acid Waste Line. There are five additional locations for 02-004(a) and one for 02-006(b). I based the locations on the fact that there was no previous sampling within the WBR Area of the Reactor Building and the additional sampling will cover the footprint of the building. The proposed sample at 02-006(b) will target what appears to be a joint in the line. If you have strong objections let me know and we can discuss.
 - *We will add the additional locations, with the following proposed exception:*
 - *The newly proposed borehole within SWMU 02-006(b), the acid waste line, is within 10 to 15 ft of three other boreholes (BH6b-6, BH6b-7, and BH6b-8). Any significant impact from this line will be adequately characterized through analysis of samples from these three boreholes.*
- 4) I understand that borehole BH12-1 through BH12-3 will be collected to evaluate the UST Fuel Line associated with AOC 02-012 (Figure 4.1-3), but where was the fuel line? It's not shown on the map.
 - *The fuel line location will be added to the map.*
- 5) Section 4.1.8, page 60: The work plan states that BH9d-1 through BH9d-3 will be sampled at an 11.5'-12.0' interval



based on the previous location of highest contamination. If the highest contamination from previous sampling was at the 11.5'-12.0' interval, why are the other samples (BH9d-4 through BH9d-11) associated with AOC 02-009(d) not being sampled below a depth of 10 ft? Also, if the highest contamination was found at 11.5', samples should be collected below that depth, say 15 ft bgs.

- *In addition to characterizing contamination from AOC 02-009(d), locations BH9d-1 through BH9d-3 are being sampled to address the northern extent of contamination from adjacent AOC 02-010, the chemical waste shack and associated underground chamber. At these three locations, sampling is proposed at deeper intervals, namely at the soil- or sediment-tuff interface and/or the top of the saturated zone. The depth of the saturated zone varies due to fluctuations in the water table and is expected to be around 20 to 35 feet in this area (p. 58). Therefore, it is anticipated that the deepest sample from each of these three locations will be collected at a depth of 20 ft bgs or deeper, depending on the depth of the saturated zone.*
- *Locations BH9d-4 through BH9d-11 are being sampled to address contamination from a surface spill [AOC 02-009(d)] further north of the AOC 02-010 area (p. 60), and are therefore proposed for surface and shallow subsurface sampling (i.e. up to 10 ft bgs).*
- 6) Section 5.1, page 68: The work plan states that a "rotary drill rig" will be used for boreholes greater than 10 ft deep. To me, "rotary" means "air rotary" and that is not acceptable. Before I jump to any conclusions, I wanted to know if you do intend to use an air rotary drill rig.
 - *The text will be modified to indicate that a hollow stem auger rig will be used for drilling and sampling activities.*
- 7) Section 7.0, page 72: FYI, I will be asking you to propose a due date for the Investigation Report. The statement provided in the work plan "[a]n investigation report will be submitted one year after receipt of final analytical data" isn't going to fly.
 - *Agreed. The date we propose is October 31, 2008.*
- 8) Also, were you aware that we can't access the website that has the SOPs? It is now password protected.
 - *Procedures are now available through our internal web site. The URL is:<http://erproject.lanl.gov/documents/procedures/qps.html>
The report will be updated to specify this URL.*

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