



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2044 A Galisteo, P.O. Box 26110
Santa Fe, New Mexico 87502-6110
Telephone (505) 827-1557
Fax (505) 827-1544



PETER MAGGIORE
SECRETARY

PAUL R. RITZMA
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 7, 2000

Theodore Taylor, Project Manager
Los Alamos Area Office
Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, NM 87544

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

**RE: REQUEST FOR SUPPLEMENTAL INFORMATION
VCA PLAN FOR POTENTIAL RELEASE SITE 03-056(c)
LOS ALAMOS NATIONAL LABORATORY, NM0890010515
HRMB-LANL-99-006**

Dear Mr. Taylor and Dr. Browne:

The Hazardous Waste Bureau (HWB) of the New Mexico Environment Department (NMED) has reviewed the Voluntary Corrective Action (VCA) Plan for Potential Release Site 03-056(c) dated September 24, 1999, and referenced by E/ER: 99-292 and requests supplemental information as detailed in the attachment.

LANL must respond to the request for supplemental information within thirty (30) days of the receipt of this letter.



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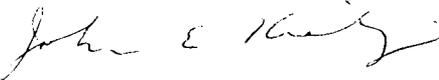
HSWA LANL 01/11/03

TJ

Mr. Taylor and Dr. Browne
July 7, 2000
Page 2

Should you have any questions or require additional assistance with this request, please feel free to contact me at (505) 827-1558 extension 1012.

Sincerely,



John E. Kieling
Manager
Permits Management Program

JEK:dxg

cc: J. Bearzi, NMED HRMB
P. Allen, NMED HRMB
S. Yanicak, NMED DOE OB, MS-J993
J. Parker, NMED DOE OB
D. Neleigh, EPA 6PD-N
J. Vozella, DOE LAAO, MS-A316
J. Canepa, LANL E/ER, MS-M992
M. Kirsch, LANL EM/ER, MS-M992
D. McInroy, LANL E/ER, MS-M992
File: HSWA LANL, 1/1114/03/03-056(c)

ATTACHMENT

Specific Comments

1. Page 1, Section 1.1, Purpose and Scope, paragraph 1:

LANL Statement: "Install run-off control structures to mitigate the possibility of residual PCBs (if present) leaving the remediated area"

HWB Comment: In addition to run-off control structures in the drainages, LANL should install run-on control structures on the mesa top to divert any storm water from entering the drainages if this has not already been done. If residual contamination remains (>1ppm for PCBs), LANL should also provide a viable schedule for maintaining the run-on and run-off control structures.

2. Page 3, Figure 1.0-2. PRS 03-056(c) including North Slope, West Slope, and ephemeral drainages:

HWB Comment: LANL should define the PRS boundary on the figure and describe it in the text in the VCA completion report.

3. Page 14, Section 4.1.3.1 Potential Human Health Exposure to Receptors:

LANL Statement: "Because of the low levels of PCBs at PRS 03-056(c) and the fact that PCBs are not easily released from soils, dermal exposure is not included. Its contribution to exposure would be at least one order of magnitude less than exposure from inhalation or ingestion."

HWB Comment: Dermal contact with soil contaminated with PCBs is one of the most important routes of PCB entry into the human body. LANL should evaluate dermal exposure and use HWB's PCB position paper for guidance.

4. Page 20, Section 4.3.3 Removal Activities, paragraph 4:

LANL Statement: "If the refined volume estimates significantly increase from that originally expected (900 yd³), a completion strategy will be developed based on the following criteria:

- Prioritization of the removal of material in areas of higher concentration
- Characterizing the extent of soil and tuff containing greater than 1 ppm PCBs and possibly doing a risk assessment to calculate remaining residual risk
- Estimating the volume of material remaining on site"

HWB Comment: LANL should make every effort to remove all soil that has greater than 1 ppm of PCBs. However, HWB understands that the excavation of tuff with PCBs greater than 1

ppm may not be feasible because it will have little cost benefit and there is acceptable risk with the remaining levels. The completion strategy that is discussed in this section should focus on only the tuff. LANL should also have a contingency plan to address further investigation/remedial activities if the site fails the risk assessment.

5. Page 23, Section 5.0 Confirmatory Sampling, paragraph 1:

LANL Statement: "Sampling will be performed to verify that...there is an acceptable human health risk to an industrial worker and an acceptable ecological risk"

HWB Comment: If LANL is going to request no further action at this PRS, LANL needs to use a residential scenario in its risk assessment in addition to the industrial worker scenario. According to current NMED's Office of General Council opinion, HWB will not be issuing NFA determinations for sites that are not assessed using a residential scenario.

6. Page 30, Section 7.0 Proposed Schedule and Uncertainties

HWB Comment: Per our meeting on April 28, 2000, LANL is proposing to perform all remediation activities under HSWA Corrective Action and to perform all waste disposal activities under TSCA. LANL's proposed schedule needs to account for waste storage time restraints imposed before disposal occurs. Under TSCA, the PCB remediation waste can be stored for 180 days and is subject to several conditions (40 CFR 761.65(c)(9)). Under RCRA, the listed hazardous constituent (PCE) would cause the waste to fall under the 90-day storage requirement. LANL needs to identify in its plan how the waste will be handled during storage and obtain prior approval.

7. Appendix B, PRS 3-056(c) Voluntary Corrective Action Fact Sheet

HWB Comment: The erosion matrix score is listed as 52.6 but on page 13 (section 4.1.2, paragraph 2) it is listed as 69.7. Please correct the discrepancy in the final report.