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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

August 5, 1998

Mr. Theodore Taylor, Program Manager
Los Alamos Area Office
Department of Energy
528 35th Street, MS A316
Los Alamos, New Mexico 87544

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

**RE: Request for Supplemental Information on
VCA Report for PRS 06-007(f)
Los Alamos National Laboratory
NM 0890010515**

Dear Mr. Taylor and Dr. Browne:

The RCRA Permits Management Program (RPMP) of the Hazardous and Radioactive Materials Bureau (HRMB) has reviewed the VCA Report for Potential Release Site (PRS) 06-007(f) dated February 26, 1996, referenced by LA-UR-96-1124, and found it to be deficient. Los Alamos National Laboratory (LANL) must respond to the request for supplemental information noted in Attachment A within thirty (30) calendar days of the receipt of this letter.



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Should you have any questions regarding this matter, 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 & Radioactive Materials Bureau

RSD:ND

cc w/attachments:

J. Canepa, LANL EM/ER, MS M992
J. Davis, NMED SWQB
B. Garcia NMED HRMB
M. Johansen, DOE LAAO, MS A316
J. Kieling, NMED HRMB
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D. McInroy, LANL EM/ER, MS M992
D. Neleigh, EPA, 6PD-N
J. Parker, NMED DOE OB
S. Yanicak, NMED DOE OB, MS J993
File: Reading and HSWA LANL 5/1111/6-007(f)
Track: LANL, 08/5/98, NA, DOE/LANL, RPMP/Dinwiddie, RE, File

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ATTACHMENT A
Request for Supplemental Information
VCA Report for Potential Release Site
06-007(f)

General Comments:

LANL shall submit all the preliminary RFI and VCA field screening data with associated quality assurance/quality control data for this PRS. Provide the site map with the location of RFI samples and their relationship to the confirmatory samples. The sample locations, soil boring descriptions, depths, backgrounds, SALs and detection limits should also be included in the data.

Site specific comments:

PRS 06-007(f), Surface Disposal Area

1. **RFI History, p.1**
Though lead and cesium-137 were the only chemicals found to exceed their respective SALs, LANL should also investigate chemicals (e.g., Ag, Ba, Cd, Cr, Cu, cyanide, Fe, Hg, Mn, Ni, Sb, Sr-90, Tl, Zn) found above background in the preliminary RFI investigation. The potential effect of all contaminants on human health and environment should be evaluated based on the HRMB approved Risk Based Decision Tree.
2. **Corrective Action, p. 1**
Clarify the discrepancies in the statements on page 1, "Tritium was eliminated because there was no problem with tritium in the waste characterization.", and page 2, "Further waste sampling was modified to eliminate analyses for gross alpha/beta/gamma radioactivity and radioisotopes because the gamma spectroscopy and tritium analyses should identify any added radioactivity due to DOE operations."
3. **Corrective Action, p. 2**
Provide the background levels used to detect the presence of radioactivity or volatile organic compounds (VOCs) during field screening. VOCs do not have approved background concentrations. Please provide the referenced document discussing VOC background.

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4. **Corrective Action, p. 2**
LANL states in the VCA report that 20 feet by 30 feet area was excavated but the depth of excavation was not specified. Please provide the information. Explain the criteria for delineating the site (i.e. how was 20x30 feet area chosen for excavation) and determining the depth of excavation.
5. **Corrective Action, p. 2**
Provide information on contents of fabricated gas cylinder discovered during cleanup and where it was disposed.
6. **Corrective Action, p. 2**
Provide rationale for disposing of waste at TA-54, Area G, as radioactive solid waste, when it was determined to be non-RCRA hazardous and non-radioactive.
7. **Corrective Action, p. 3**
Lead was higher than background (22.3 mg/kg) in 2 out of 3 confirmatory samples (196 mg/kg, and 91.7 mg/kg). Provide information on parameters used to calculate preliminary remediation goals (PRGs). The risk assessment should be based on a current and future land use scenario. Provide documentation for the determination of current and future land use.

File:c:neelam\prs06-007f