



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
*Hazardous & Radioactive Materials Bureau*  
2044 Galisteo  
P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-1557  
Fax (505) 827-1544



MARK E. WEIDLER  
SECRETARY

EDGAR T. THORNTON, III  
DEPUTY SECRETARY

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

November 6, 1997

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

Dr. Sigfried Hecker, Director  
Los Alamos National Laboratory  
P. O. Box 1663, Mail Stop A100  
Los Alamos, New Mexico 87545.

**RE: Request for Supplemental Information**  
**RCRA Facility Investigation Report**  
**Technical Areas 8 and 9**  
**Los Alamos National Laboratory**  
**NM0890010515**

Dear Mr. Taylor and Dr. Hecker:

The RCRA Permits Management Program (RPMP) of the New Mexico Environment Department's Hazardous and Radioactive Materials Bureau has reviewed the RCRA Facility Investigation Report (LAUR-96-418) for Technical Areas 8 and 9 (referenced by EM/ER:96-119) 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. 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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TC

Mr. Taylor and Dr. Hecker  
November 6, 1997  
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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,



Robert S. ("Stu") Dinwiddie, PH. D., Manager  
RCRA Permits Management Program

RSD:kth

attachment

cc w/ attachment:

J. Canepa, LANL EM/ER, MS M992  
B. Garcia, NMED HRMB  
T. Glatzmaier, LANL DDEES/ER, MS M992  
K. Hill, NMED HRMB  
M. Johansen, DOE LAAO, MS A316  
J. Kieling, 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  
G. Saums, NMED SWQB  
J. Vozella, DOE LAAO, MS A316  
S. Yanicak, NMED DOE OB, MS J993  
File: HSWA LANL 5/1157/8 & 9  
Track: LANL, doc date, NA, DOE/LANL, HRMB/Dinwiddie, RE, file



**ATTACHMENT**  
**Request for Supplemental Information**  
**RCRA Facility Investigation Report**  
**Technical Areas 8 and 9**

The following potential release sites were presented in this document: 8-004(d), 8-009(d-e), 9-001(a-b, d), 9-003(g-h, l), 9-005(a, d), 9-009 and C-8-010.

Based on the site characterization information provided within the RFI Report, RPMP has determined that LANL may request a permit modification to remove the following PRSs from the HSWA Module of the RCRA Operating Permit based on "No Further Action" Criterion 5 (Document of Understanding, Annex B dated February 1, 1996): 8-004(d) and 9-009.

1. At C-8-010, LANL failed to obtain depth samples (to 24 inches) as specified within the approved RFI Workplan; therefore, LANL must resample this area of concern as specified by the approved Workplan.
2. At 8-009(d), LANL must conduct further sampling since LANL failed to determine the extent of contamination.
3. For PRSs 9-005(a), 8-009(d-e), 9-001(a-b, d) and 9-003(g-i), LANL should revise the screening assessment (multiple chemical evaluation concept) with the following human health-based screening assessment process:

The screening assessment should compare the maximum concentration or activity of each contaminant at the site to a screening action level (SAL) which is a risk-based concentration calculated using a conservative target risk. SALs should be obtained from EPA Region 6's *Human Health Media-Specific Screening Levels*.

SALs for carcinogens are calculated based on the lower end of 1E-04 to 1E-06 "risk range" to account for multiple carcinogenic contaminants. SALs for non-carcinogens do not account for chemical mixtures; therefore, if more than one non-carcinogen has been identified or is expected, then the non-carcinogenic chemical SAL should be divided by a safety factor of 10.

If maximum detected concentrations or activities of contaminants in a given medium are below 1E-06 cancer risk or below 0.1 hazard quotient SAL, then contaminants can be eliminated from further evaluation as chemicals of potential concern (COPCs). Any COPCs failing this screening should be carried forward through a risk assessment.

3. All future Corrective Action documents should utilize and cite the "No Further Action Criteria" (NFA) presented within Annex B of the Document of Understanding (DOU) and not those within the Project Consistency Team Policy number 015. LANL should provide a table of the DOU Criteria appropriate to those PRSs proposed for NFA within this RFI Report.