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PETER MAGGIORE
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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

April 28, 1999

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

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

RE: Request for Supplemental Information
09-002 and 09-011(b) RFI Report
Los Alamos National Laboratory
NM0890010515

Dear Mr. Taylor and Dr. Browne:

The RCRA Permits Management Program (RPMP) of the New Mexico Environment Department (NMED) has reviewed the RCRA Facility Investigation Report (RFI) for 09-002 and 09-011(b) (referenced by LA-UR-98-3493, dated September 30, 1998 (EM/ER:98-397) and is requesting supplemental information. Most of RPMP's comments request clarification or reflect only minor issues.

Primary concerns that have arisen during the review of the RFI Report include: 1) the 1949 property appraisal form referenced in the RFI Report was not included for RPMP to review, 2) the exact location of 09-002 may not have been properly identified and sampled, 3) the samples for characterization may not have been collected at the proper depth, or the samples may have been collected from backfill material used to fill the burn pit during removal and, 4) due to limited site use history, radionuclide and organic chemical analysis should have been conducted at 09-011(b).

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Mr. Theodore Taylor and Dr. John Browne
April 28, 1999
Page 2 of 3

Los Alamos National Laboratory (LANL) must respond to the request for supplemental information (Attachment) within thirty (30) calendar days of receipt of this letter. Should you have any questions or require additional assistance regarding this request, please feel free to contact Mr. John Kieling, RPMP's LANL Facility Manager at (505) 827-1558, extension 1012.

Sincerely,



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

RSD:vmm

attachments

cc: J. Canepa, LANL EM/ER, MS M992
J. Davis, NMED SWQB
B. Garcia, NMED HRMB
J. Kieling, NMED HRMB
M. Kirsch, EM/ER, MS M992
S. Kruse, NMED HRMB
H. LeDoux, DOE LAAO, MS A316
V. Maranville, NMED HRMB
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: Reading and HSWA LANL 05/1157/09
Track: LANL, doc date, n/a, DOE/LANL, NMED HRMB/Dinwiddie, RE, file

ATTACHMENT

The following Table includes a complete listing of the potential release sites (PRS) presented in this document, LANL's proposed actions, and the rationale for the RPMP concurrence or nonconcurrence on each of the proposed actions.

PRS	LANL's PROPOSED ACTION	DOES RPMP CONCUR?	RPMP RATIONALE
09-002	NFA ¹	No	Location of burn pit may not be properly identified.
09-011(b)	NFA	Yes	See General Comment #2

¹ No Further Action (NFA)

General Comments:

1. At the time of the approval, the RFI Work Plan for Operable Unit 1157 made no mention of the property appraisal form referenced in §2.2.2 or to the uncertainties associated with the exact location of PRS 09-002. For this reason, an investigation methodology was approved for a location which RPMP now has reason to question. LANL should submit a Sampling and Analysis Plan (SAP) to further investigate the location and nature and extent of contamination from PRS 09-002.
2. Phase I Investigations were performed at both sites according to the approved RFI Work Plan for Operable Unit 1157. Since no hazardous constituents were identified above background or detection limits at PRS 09-011(b) RPMP concurs with LANL's request for NFA at this PRS. This concurrence is consistent with NFA Criterion 3, which states, "No release to the environment has occurred or is likely to occur in the future from the solid waste management unit/ area of concern."

Specific Comments:

3. §2.2.1 Site Description, page 5

"PRS 09-002 is a decommissioned, inactive burn pit located near the old Far Point firing site north of the active TA-9 area... The components of this PRS is the pit itself, which is a shallow, below ground level, depression, 10 ft by 13 ft by 2 to 3 ft deep."

The size of the burn pit as described in §2.2.2 Operational History (page 8), which is based on the written property appraisal form (Spillman 1949, 14916), is *"An irregular shaped excavation of earth approximately 20 ft. wide by 40 ft. long and 3 ft. in depth..."*

Please submit the property appraisal form (Spillman 1949, 14916) and any information available which would confirm the sampled site is the only former burn pit area in TA-09. It is possible that the burn pit described in the property appraisal form has been backfilled to grade and not identified and sampled.

4. §2.3.3 Preliminary Conceptual Model, page 9

"Even though it has smaller dimensions than described in the 1949 property appraisal form, the 10-ft by 13-ft topographic depression 300 ft northeast of the Far Point firing site identified by the two retired TA-9 employees is the most probable location of the burn pit."

Please verify the location of the burn pit using historical photographs or any other historical information which may be available. Both retired employees interviewed stated the identified burn pit location was the "probable location" of the former burn pit which was operational during the period they were employed. The statement from the former employees indicates that they are uncertain of the location of the former burn pit. In addition, it is possible that more than one burn pit was located at TA-09. Please clarify the location and explain the size discrepancy from the location identified by the retired employees and the location described in the property appraisal form. Also, please verify that only one burn pit formerly existed at TA-09.

5. §2.3.4.2 Field Investigation, page 10

"On May 10, 1994, two 0 to 0.5 ft. surface soil samples (AAB0896 and AAB0897) were collected at locations 09-6000 and 09-6001. Soil moisture at the time of sampling was normal, that is, dry to slightly moist; the weather was cool, and the skies were overcast. No

ash or burned debris were observed in the soil sampling locations.”

No trace amounts of ash or burned materials were observed at the sampled locations. Please submit any information regarding ash disposal or backfilling which was conducted at PRS 09-002 to ensure samples were collected from the burn pit. Clarify if the burn pit was scraped clean after use or if backfill material was used to cover the burn pit. Please clarify the environmental media sampled (e.g., soil, sediment, tuff). If backfill material was sampled, this most likely does not represent conditions resulting from activities conducted at PRS 09-002.

6. §2.3.4.3 Data Review, page 11

“No radionuclide were identified for analysis in the investigation of the PRS.” and “No organic chemicals were identified for analysis in the investigation of this PRS.”

Due to limited background information relating to past operational history, discrepancies in the exact location and size of the burn pit, amount of material disposed of in the burn pit, and only personal knowledge from former employees of materials disposed of in the burn pit, full suite analyses should be conducted on all additional samples at the location of the burn pit.