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GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Hazardous & Radioactive Materials Bureau  
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MARK E. WEIDLER  
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**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

September 24, 1997

Mr. G. Thomas Todd, Area 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  
Voluntary Corrective Action Completion Report  
Potential Release Site 12-001(a)  
Los Alamos National Laboratory  
NM0890010515**

Dear Mr. Todd and Dr. Hecker:

The RCRA Permits Management Program (RPMP) of the New Mexico Environment Department has reviewed the Voluntary Corrective Action Completion Report (LA-UR-96-3316) for Potential Release Site 12-001(a) dated September 1996 and requests supplemental information 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.



3822

HSWA LANL 2/10/95/14 + 12/67

FL

Mr. Todd and Dr. Hecker  
Sep 24, 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:

- T. Baca, LANL EM-DO, MS J591
- T. Davis, NMED HRMB
- B. Garcia, NMED HRMB
- T. Glatzmaier, LANL DDEES/ER, MS M992
- K. Hill, NMED HRMB
- J. Jansen, LANL EM/ER, MS M992
- 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
- T. Taylor, DOE LAAO, MS A316
- S. Yanicak, NMED DOE OB, MS J993

File: Reading and HSWA LANL 2/1085/12  
Track: LANL, doc date, NA, DOE/LANL, HRMB/kth, RE, file

**ATTACHMENT**  
**Request for Supplemental Information**  
**Voluntary Corrective Action Completion Report**  
**Potential Release Site 12-001(a)**  
**September 1996**

**General Comment:** LANL has failed to provide the sampling results/information necessary to determine that contaminant migration is negligible. Referencing another document for sampling results is unacceptable in corrective action Reports. All pertinent sampling results for each PRS must be included in each VCA/RFI Report.

1. **Page 1; Section 2.0:**
  - a. LANL must include **all** sampling data that has been performed at each PRS in future Reports. The Report must be a "stand alone" document.
  - b. Also, LANL mentions that six surface samples were collected outside the steel-lined firing pit. However, only 3 samples were submitted for fixed laboratory analysis. Indicate what the other 3 samples were used for.
2. **Page 4; Section 3.1:** LANL should not only present an evaluation of risk based on a most likely exposure scenario, but also on a residential exposure scenario.
3. **Page 4; Section 3.3:** LANL mentions that no confirmatory sampling was performed because all the waste was removed from the steel lined pit. The RFI Report fails to mention if the steel liner was inspected to ensure that it was not cracked or torn or if rinsate samples were obtained from the pit to ensure that the liner was properly decontaminated. Please clarify if these actions occurred.
4. **Page 7; Appendix A, 1st paragraph:**
  - a. LANL mentions that the sample data were compared to the QA/QC sample data using numerical acceptance criteria established by either the analytical laboratory or EPA. Please clarify the criteria you are using in determining the data usability. Indicate if this criteria was approved by the Administrative Authority and, if so, reference the approval.
  - b. Also, LANL mentions that some of their data is qualified. Indicate what the **PM** qualifier means.
5. **Page 7; Third Paragraph:** LANL mentions that the sample values for certain analytes were less than ten times the blank value, indicating that the detection could be the result of blank contamination. Indicate the criterion in which LANL is basing this assumption.