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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

November 26, 1997

Mr. G. Thomas Todd, Area Manager  
Department of Energy-Los Alamos Area Office  
528 35th Street, Mail Stop A316  
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 Supplementary Information on TA-14 OB/OD Units  
EPA I.D. No. NM0890010515

Dear Mr. Todd and Dr. Hecker:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) RCRA Permits Management Program has completed review of the Los Alamos National Laboratory (LANL) response to HRMB's June 10 notice of deficiency on technical adequacy for TA-14 OB/OD treatment units.

The enclosed Attachment lists the required information necessary for NMED to declare the application technically adequate and to commence drafting the permit text. The information requested must be submitted to HRMB within thirty (30) calendar days from the date you receive this letter. Please present the required information in two hard copies and on a 3.5" diskette compatible with Word Perfect 5.2. Failure to submit the required information in this designated time may result in issuance of a Notice of Intent (NOI) to deny a Permit.

If you have any questions, please contact Cornelius Amindyas or John Young of my staff at (505) 827-1561.

Sincerely yours,

Stu Dinwiddie, Ph.D., Manager  
RCRA Permits Management Program  
Hazardous and Radioactive Materials Bureau

cc: Benito Garcia, Chief, HRMB  
David Neleigh, EPA Region VI  
John Kieling, HRMB  
Herman LeDoux, DOE LAAO, MSA316  
Jody Plum, DOELAAO, MSA316

FILE: LANL TA-14 Red 97  
TRACK: LANL 11/26/97, NA, LANL/DOE, HRMB/CA, RE, File



3869

ATTACHMENT A

REQUEST FOR SUPPLEMENTARY INFORMATION:

November 26, 1997

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has completed review of Los Alamos National Laboratory's (LANL's) response to the June 10, 1997 notice of deficiency (NOD) on technical adequacy of OB/OD Permit application for TA-14. After reviewing the subject response to the NOD, HRMB has determined that LANL must address the following issues satisfactorily before the application can be declared technically adequate, and a draft permit developed:

**NOTE:** Quotes in **bold** print below, are taken directly from the Revised Part B Permit Application text submitted by LANL, dated October 1997:

- A) *Sampling and Analysis Plan (SAP) as required by 20 NMAC 4.1.500 incorporating 40 CFR 264.278.*

LANL must provide a stand alone Sampling and Analysis Plan for the post-detonation soil at TA-14. The SAP must include:

1. a topographic map showing the proposed soil sample locations.
2. the proposed vadose zone soil monitoring program, as well as sample collection, sample preservation and shipment, sampling and analysis procedures, and chain of custody control;
3. a description of the sampling methods that will be used to obtain discrete representative samples of post-detonation soil to be analyzed. List the parameters that will be analyzed for in each reactive and non-reactive hazardous waste, the rationale for the selection of these parameters, and the test methods which will be used for these parameters;
4. the parameters selected and the EPA approved or equivalent acceptable analytical methods for each parameter;
5. a description of the background values for each proposed monitoring parameter or constituent; and
6. a description of the proposed sampling, analysis and statistical comparison procedures to be used in analytical data interpretation.

- B) *List of Waste Explosives to be Treated at the OB and OD Units:*

Provide a list of waste explosives that will be **detonated** at TA-14, and a **separate list** for waste that will be **burned** at TA-14. This request was not addressed by LANL in response to item # G(2) of the NOD. The subject lists are needed to be consistent with HRMB's requirement, which other facilities have provided to HRMB in recent OB/OD permit applications.

C) *Ground Water Detection Monitoring Wells:*

- 1) *Page 4-10, second paragraph, last sentence: ("Therefore withdrawal rates are not applicable to any of the OB/OD units at LANL".):*

Although no production wells are located within 3,500 feet of any of the OB/OD units, HRMB feels that the capture radius of production well PM-5 described in the Hydrogeologic Work Plan of December 1996 may influence and capture groundwater flow in the area of TA-14. LANL must therefore provide an estimate of the capture zone around the production well PM-5.

- 2) *"Section 4.6.1.2 Monitoring and Reporting"*

Provide a topographic map illustrating the location of all wells within a 3 mile radius of TA-14. LANL should code the current and proposed alluvial, intermediate, regional, and Tschicoma-Tshirege perched wells and also illustrate which wells are routinely monitored. Present a monitoring schedule.

- 3) *Section 4.6.1.2, first paragraph, third sentence:*

**("Routine samples are analyzed for toxic constituents, basic water quality, and resource depletion".)**

Provide all the data for the "routine samples" and define the word "routine". How often are the water samples analyzed? Explain whether all the wells are sampled, and for which constituents. List all constituents for which the samples are analyzed.

- 4) *Page 4-11, paragraphs 2-4 and Page 4-12 first paragraph:*

Since the shallow groundwater systems (alluvial and springs) are most likely to be impacted by the OB/OD activities at TA-14, LANL must install alluvial wells A-45, A-46, A-47, and A-48 as part of the detection monitoring requirement of the proposed OB/OD permit.

- 5) *Page 4-12, second paragraph, the last 2 sentences: ("Well R-28 will be located downgradient of well R-27. It will also be used to provide water quality information for any intermediate perched zones and the regional aquifer.")*

The intermediate zone groundwater systems are proposed in the Hydrogeologic Work Plan (of December 1996) to be sampled as they are encountered in drilling to the regional aquifer. However, HRMB suggests that LANL should first drill and monitor the alluvial wells described under item # 4 above, and not drill to the regional aquifer, until such a time when the concentrations of hazardous constituents in the vadose zone water samples from the alluvial wells indicate a potential to impact the regional aquifer.

- 6) *Page 4-13, line 17:* ("However, the Hydrogeologic Work Plan described above will provide information on water quality in this area.")

Provide a schedule for well installation/completion at TA-14, and what "information on water quality in this area" will be provided to HRMB. This information should also include the frequency at which the water quality information will be provided and in what format it will be submitted to HRMB.

- D) *Topographic Map as required by 20 NMAC 4.1.900 incorporating 40 CFR §270.14(b)(19).* Resubmit Figures (i.e., Maps) 10-1 through 10-4, showing the location of the OB/OD units and the arroyos around TA-14. This will make it easier for third party review.