

TA 16

NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Hazardous Waste Bureau*

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ENTERED



BILL RICHARDSON  
Governor

DIANE DENISH  
Lieutenant Governor

RON CURRY  
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 16, 2010

George J. Rael  
Environmental Operations Manager  
Los Alamos Site Office  
Department of Energy  
3747 West Jemez Road, Mail Stop A316  
Los Alamos, NM 87544

Michael J. Graham  
Associate Director Environmental Programs  
Los Alamos National Security, LLC  
P.O. Box 1663, MS M991  
Los Alamos, NM 87545

**RE: NOTICE OF APPROVAL  
SUPPLEMENTAL INVESTIGATION REPORT FOR CONSOLIDATED UNITS  
16-007(A)-99 AND 16-008(A)-99 AT TECHNICAL AREA 16  
LOS ALAMOS NATIONAL LABORATORY  
EPA ID #NM0890010515  
HWB-LANL-10-008**

Dear Messrs. Rael and Graham:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and the Los Alamos National Security, LLC (LANS) (collectively, the Permittees) *Supplemental Investigation Report for Consolidated Units 16-007(a)-99 and 16-008(a)-99 at Technical Area 16* (Report), dated January 2010 and referenced by LA-UR-09-8193/ EP2009-0643. NMED hereby issues this Notice of Approval and provides the following comments.

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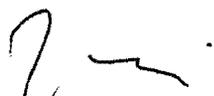
**Comments:**

1. Results of the revised risk screening evaluations conducted for 90s Line after localized removal of chromium contaminated soil and tuff do not indicate an unacceptable risk to human health and the environment. However, the Permittees must continue to conduct inspections of the erosion controls installed in the drainages to the 90s Line Pond and submit annual reports. In addition, sediment samples must also be collected from the 90s Line Pond every five years to determine if concentrations of contaminants are increasing in the pond sediments.
2. The Permittees conducted revised risk screening evaluations for 90s Line. Previous investigations indicated that the total excess cancer risk exceeded the target risk level of  $1 \times 10^{-5}$  under the construction worker scenario. The revised risk screening evaluations conducted with data obtained after the excavation of contaminated media indicated that the total excess cancer risk now is below the target risk level. NMED noted that the Permittees did not revise the risk screening evaluations for 30s Line using confirmatory sampling data. The revised risk screening evaluations would have generated lower hazardous index and excess cancer risk values under the construction and residential scenarios.
3. Previous investigations indicated that the concentrations in groundwater of several inorganic and organic chemicals exceeded groundwater standards. The Permittees developed Monitoring Well (MW) 16-26644 in October, 2009 and anticipate quarterly sampling to begin in January, 2010. NMED cannot issue Certificates of Completion (COCs) for these sites until two quarters of groundwater data, including water levels, is submitted.
4. As noted in the Report (Deviations, page 5), the Permittees were not able to abandon Borehole (BH) 16-608154 because of the equipment and weather problems. The Report proposed abandoning the BH 16-608154 in January, 2010. The Permittees must submit documentation of abandonment of the borehole by February 26, 2010.
5. The Report recommended that NMED should issue COCs for Consolidated Units 16-007(a)-99 and 16-008(a)-99. All requests for COCs must be submitted under separate correspondence and not as part of the Report. The Permittees may request COCs with Controls for these sites after the groundwater monitoring has been conducted for MW 16-26644, and if impacts to groundwater are not observed.

Messrs. Rael and Graham  
February 16, 2010  
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Please contact Neelam Dhawan of my staff at (505) 476-6042 should you have any questions.

Sincerely,



James P. Bearzi  
Chief

Hazardous Waste Bureau

cc: J. Kieling, NMED HWB  
D. Cobrain, NMED HWB  
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L. King, EPA 6PD-N  
File: LANL, 2010, TA 16, SWMUs 16-007(a)-99 and 16-008(a)-99.