

Kim



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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

April 21, 1997

Mr. Theodore J. Taylor, Program Manager
Los Alamos Area Office
Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, New Mexico 87544

Mr. Jorg Jansen, Program Manager
Environment Restoration
Los Alamos National Laboratory
1900 Diamond Drive, Mail Stop M992
Los Alamos, New Mexico 87544

**RE: Notice of Deficiency for Voluntary Corrective Measures (VCM) Plan
for Potential Release Sites at TA-16, Field Unit 3, March 25, 1997, Los
Alamos National Laboratory (LANL) NM 0890010515**

Dear Mr. Taylor and Mr. Jansen:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has reviewed the the VCM Plan for Seventeen PRSs at TA-16 dated March 25, 1997, and referenced by EM/ER: 97-081, and has determined it to be deficient. The attachment includes comments concerning the corrective measures at the TA-16 site.

Should you have any questions concerning this letter, please contact either myself or Mr. John Kieling at (505) 827-1561.

Sincerely,

Benito Garcia, Chief
Hazardous and Radioactive Materials Bureau

BG:jek

attachment

7/5/97 LANL 3/10/82/16



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Mr. Taylor and Mr. Jansen
April 21, 1997
Page 2

cc (w/attachment): T. Davis, NMED HRMB
R. Dinwiddie, NMED HRMB
K. Hill, NMED HRMB
J. Kieling, NMED HRMB
T. Glatzmaier, DDEES/ER, MS M992
G. Saums, NMED SWQB
M. Johansen, LAAO, MS A316
M. Leavitt, NMED GWQB
D. McInroy, EM/ER, MS M992
D. Neleigh, EPA, 6PD-N
J. Parker, NMED DOE OB
S. Yanicak, NMED DOE OB, MS J993
File: HSWA LANL FU-3/OU-1082/TA-16
Track: LANL, 4/11/97, N/A, DOE/LANL, HRMB/JEK, RE, File

General comments:

1. Field screening methods used to guide this VCA investigation such as: LIBS, XRF, DTECH and spot test kits, are fairly unique to FU-3. In order to verify that FU-3's field screening methods are comparable to fixed-lab results and are reliable for bounding contamination, HRMB still needs to review a comparison study or data if available.
2. LANL will need to address the verification procedures and results, clearly identified and displayed, in the VCM Report to demonstrate that these sites will be clean upon completion of the remediation. All pertinent data should be listed and displayed in such a manner to show that soil contamination at these sites was in fact "bounded" in the vertical and lateral directions before removal.
3. LANL needs to indicate that verification sampling within an excavation or trench addresses both the vertical and horizontal directions to demonstrate that cleanup levels have been achieved. The current verification sampling plan appears to address only the vertical direction (e.g., the bottom of the excavation). The horizontal direction would be a key consideration at the soil/tuff interface where underflow conditions might exist to increase a contaminants mobility.
4. If worked is stopped at any time during this VCM and Decontamination and Demolition process, at TA-16, HRMB needs to be contacted and be provided with adequate information indicating the purpose for stopping work. LANL shall also provide HRMB adequate information on how they will proceed if variance from the plan is deemed necessary.
5. The sampling of PRSs indicated within the text is difficult to understand whereas Table 3.1.2-1 is more appropriate. In future plans a reference to the field screening and analytic (confirmatory) sampling table would be of use.

Specific Comments:

1. **§ 3.1.2.1, Page 23, Approved Work Plan Sampling, PRS 16- 025(x).**
The text states that "Three laboratory samples were originally proposed for this site.". After reading the paragraph, it is not clear whether more or less than three laboratory samples will be selected based on the field screening.
2. **§ 3.1.2.2, Page 30, Augmented Work Plan Sampling, PRS 16- 029(x).**
If contaminated soils and tuff are encountered within the swale area, LANL should investigate contaminant pathways to ground water at this site.