

TA-16

State of New Mexico
ENVIRONMENT DEPARTMENT



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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

February 3, 2006

David Gregory
Federal Project Director
Los Alamos Site Office
Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, NM 87544

David McInroy
Remediation Services Deputy Project Director
Los Alamos National Laboratory
P.O. Box 1663, Mail Stop MS M992
Los Alamos, NM 87545

**RE: NOTICE OF DISAPPROVAL
ACCELERATED CORRECTIVE ACTION WORK PLAN FOR AREA OF
CONCERN 16-024(v) AND SOLID WASTE MANAGEMENT UNITS 16-026(r)
AND 16-031(f) AT TECHNICAL AREA 16
LOS ALAMOS NATIONAL LABORATORY, EPA ID #NM0890010515
HWB-LANL-06-003**

Dear Messrs. Gregory and McInroy:

The New Mexico Environment Department (NMED) is in receipt of the U.S. Department of Energy and the Regents of the University of California's (collectively, the Permittees) *Accelerated Corrective Action Work Plan for Area of Concern 16-024(v) and Solid Waste Management Units 16-026(r) and 16-031(f) at Technical Area 16*, dated January 2006 and referenced by LA-UR-05-3979/ER2006-0326. NMED has reviewed this document and hereby issues this notice of disapproval. The Permittees must address the following comments within 30 days of receipt of this letter. All submittals must be in the form of two paper copies and one electronic copy (CD/DVD) in accordance with Section XI.A of the Consent Order.



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Comments:

1. Section 2.3.1 Summary of Chemicals of Potential Concern, pg. 5:

NMED Comment: NMED assumes that the fire trucks housed at this station responded to incidents Facility-wide and not just those at TA-16. The Permittees must address the potential of fire trucks becoming contaminated with radionuclides from other sites at the Facility. Based on this information, the Permittees may need to analyze for alpha spectroscopy, beta spectroscopy, and tritium at SWMU 16-026(r).

2. Section 5.0 Investigation Methods, pg. 10:

NMED Comment: NMED does not accept references to SOPs as the sole description of field activities. The Permittees must describe the following SOPs in Table 1:

- SOP-01.06
- SOP-01.07
- SOP-01.10
- SOP-01.12
- SOP-03.11

3. Section 5.1.2 Sampling and Excavation Activities, pg. 10:

NMED Comment: The Permittees plan to collect samples using the “spade and scoop method described in SOP-06.09 or with the assistance of a backhoe or similar equipment, as appropriate.” The Permittees should be using an EnCore™ sampler (or equivalent) on relatively undisturbed soil to collect samples for volatile organics.

The Permittees also state that “[f]ield screening for using an HE spot-test kit may also be conducted to characterize area of gross contamination.” If RDX was the only explosive compound used at TA-16, the immunoassay test alone would be appropriate. Because it wasn't the only explosive compound, the Permittees must suspect other explosive compounds could be present in the soil. A combination of the immunoassay test and the HE spot test should be used because the spot test is sensitive to explosive compounds in addition to RDX. The Permittees must also spot test for TNT.

NMED does not believe that VOCs will be detected in the proposed 0-6-inch sampling interval. Instead, the Permittees must collect samples from the 6-12-inch interval.

4. Section 5.1.3 Fixed Laboratory Analytical Methods, pg. 11:

NMED Comment: The Permittees must also analyze the samples collected at SWMU 16-024(v) for perchlorate.

Messrs. Gregory and McInroy
February 3, 2006
Page 3

5. Section 5.2.2 Excavation and Confirmation Sampling

NMED Comment: The Permittees plan to collect samples using the "spade and scoop method described in SOP-06.09 or with the assistance of a backhoe or similar equipment, as appropriate." The Permittees should be using an EnCore™ sampler (or equivalent) on relatively undisturbed soil to collect samples for volatile organics.

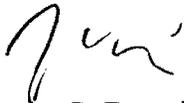
The Permittees are proposing to sample only the last approximately 80 feet of the pipe. Because the intent of this work plan is to complete a final remedy, the entire site must be investigated. If the pipe is not encountered, the Permittees must collect additional samples at 6-12 inches and the soil/tuff interface at the location where the first bend in the pipe occurred (approximately 30 feet south of building 180) according to Figure 4. If the pipe is encountered, the Permittees must collect the samples from the intervals immediately below the pipe.

6. Section 7.0 Schedule

NMED Comment: According to Section VII.F of the Consent Order, the field work must be completed within 180 days of the start of field work. The Permittees must notify NMED within three business days when the field work is complete so a due date for the Remedy Completion Report can be calculated.

Should you have any questions, please contact Darlene Goering at (505) 428-2542.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:dxg

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