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File

ATTACHMENT A  
Supplemental Information Required

Specific Information Requirements:

1. The NOD Response to deficiency number 3 indicates that Tables 1 and 2 in the response show that acetone and methylene chloride were detected in the blanks for SWMUs 21-024(a, h, and l). This contradicts text for SWMU 21-024(l) which indicates that no QA/QC samples were associated with this site. When were the blind samples submitted to the labs, and why were so many samples submitted? The number of blind samples submitted almost equals the number of samples collected during the investigation.

Because the levels of acetone and methylene chloride were low, NMED however requires an eco-risk evaluation to be performed before DOE/LANL submits a Class III Permit Modification to NFA these sites.

2. A review of the information provided for PRS# 21-024(a) in the addendum Report does not mention the presence of benzene or 1,1-dichloroethane. The information provided in the NOD Response indicates a need for further assessment at this site. NMED requires additional sampling be done and that DOE/LANL submit a schedule for Phase II workplan and sampling.
3. In EPA's NOD, DOE/LANL was requested to provide documentation that LANL had addressed problems noted in deficiency #4 of the NOD. In LANL's response they indicate that a memo will be forthcoming from the ER Project Office. NMED nor EPA have received such a memo and LANL has failed to completely respond to the NOD within the required time frame and is therefore in non compliance. Within ten (10) calendar days of the receipt of this correspondence DOE/LANL must provide to NMED documentation that the quality assurance problems (sample batching) have been corrected and the steps taken to correct those problems. NMED requires DOE/LANL to submit copies of raw (all unvalidated lab result printouts) laboratory results on any further sampling at these sites.
4. DOE/LANL needs to provide schedules for sampling and reports completed for PRS#21-006(b) and 21-027(c).
5. NMED will agree that SWMU 21-007 may be removed from Module VIII of the RCRA Permit provided that all of the area considered to be SWMU 21-007 is contained within the boundaries of SWMU 21-021. Once NMED receives certification that such overlap exists it will review SWMU 21-007 in the appropriate NFA Modification request.

6. In DOE/LANL's response to EPA's NOD to deficiencies 21, 22, and 23, as well as, any other responses directed to the use of LANL's position paper on polycyclic aromatic hydrocarbons (PAHs) do not reflect the position of NMED or EPA. In a letter dated May 19, 1995, EPA addressed LANL's position paper entitled, "Interim Guidance for Evaluating Polycyclic Aromatic Hydrocarbons in Soil". EPA determined the use of a PAH data from a data set collected in New England was not appropriate for use at Los Alamos. LANL must collect their own data and complete the following actions:
  - a. Site 21-022(h): PAH values were below screening action levels (SALs). LANL must submit information for characterization of associated sump prior to final determination of this site.
  - b. Site 21-026(d): LANL must conduct a risk assessment as indicated in the NOD, as there are several exceedences of the screening action levels (SALs) by PAHs.
  - c. Grid extension: The presence of elevated semivolatiles must be reevaluated.
7. LANL may request a Class III Permit Modification for SWMUs: 21-011(k) and 21-023(c)