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55161

Date: August 2, 1996  
 Refer to: ~~EM/ER-96-425~~

Mr. Benito Garcia  
 NMED-HRMB  
 P.O. Box 26110  
 Santa Fe, NM 87502

**SUBJECT: REQUEST FOR SUPPLEMENTAL INFORMATION ON RFI REPORT FOR TA-21 AND ITS ADDENDUMS**

Dear Mr. Garcia:

As the Los Alamos National Laboratory's Environmental Restoration (ER) Project engaged the task of developing the response to the New Mexico Environment Department's (NMED's) letter *Request for Supplemental Information on Resource Conservation and Recovery Act Facility Investigation (RFI) Report for Technical Area 21 and its Addendums*, dated July 1, 1996, we noted that clarification of some of the Specific Information Requests would allow us to provide more informed responses. On Wednesday, July 31, 1996, Dave McInroy of our staff contacted Mr. Stu Dinwiddie with these concerns. Mr. Dinwiddie suggested that we provide NMED with a list of requests that need clarification and request an extension to respond to the Notice of Deficiency (NOD) until some period of time after your staff had clarified the information request. Listed below please find those items where clarification is necessary. We would also like, at this time, to request an extension for response submittal to 15-calendar days after we receive clarification.

The following are the items which need some clarification:

**Specific Information Request #1:** The first part of this information request seems to have been triggered by poorly executed tables in the Laboratory's NOD response and unclear text in the phase reports. We apologize for the confusion and will clarify the quality assurance/quality control sample issue with better defined tables in the final response. The clarification desired is whether NMED is questioning the date that the blind laboratory samples associated with Potential Release Sites (PRSs) 21-024(a, f, g, h, and I) were submitted to the analytical laboratory (that is, the specific date of submission) or the time of submission of the blind samples relative to the field samples. Is there some particular concern relative to the blind sample submittal timing that we could help to clarify?

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The second part of this information request seems to have a missing phrase since it does not seem logical that NMED would require an ecological risk evaluation "Because levels of acetone and methylene chloride were low...". Could you please clarify this statement.

**Specific Information Request #4:** What schedule information is NMED interested in for PRS 21-006(b) beyond the investigation start date and report completion date for the settling pit as provided in the NOD response?

**Specific Information Request #5:** For PRS 21-007, what does NMED consider adequate for certification that all of the area considered to be PRS 21-007 is contained within the boundaries of PRS 21-021? Since the salamander incinerators were semiportable and locations not well documented, it is difficult to know how best to meet this requirement.

**Specific Information Request #6:** It is our understanding that the current polyaromatic hydrocarbons (PAH) approach is to develop a background data set for PAHs using Laboratory data and apply these background data to guide cleanup levels at sites where the current source of PAHs cannot be identified or where it is not clear that there was no release of PAHs. At sites where a current nonrelease source of PAHs can be identified, PAHs will not be cleaned up. Is this NMED's understanding as well? If so, we will apply this approach to the PRSs in question when developing our response.

*[As a point of interest, the May 19, 1996 Environmental Protection Agency letter indicating it was inappropriate to use a PAH data set collected in New England postdates our submittal of the NOD response. We did not recommend no further action for these PRSs using a rationale known to be unacceptable at the time of our response.]*

Your indulgence in our developing the response to this Information Request is appreciated. We would like to be clear in our response and address the intent our your questions and comments. If you have questions regarding this request, please contact Garry Allen at 667-3394 or Bonnie Koch at 665-7202.

Sincerely,

  
Jorg Vansen, Program Manager  
LANL/ER Project

Sincerely,

  
Theodore J. Taylor, Program Manager  
DOE/LAO

JJ/TT/bp

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