

MSWA LANL 1/106/21/21-024 (d.i) 4
-027(a)



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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

June 25, 1998

Mr. Theodore Taylor, Project Manager
Los Alamos Area Office
Department of Energy
528 35th Street
Los Alamos, New Mexico 87544

Dr. John C. Browne, Director
Los Alamos National Laboratory
P. O. Box 1663, Mail Stop A100
Los Alamos, New Mexico 87545

**RE: Request for Supplemental Information concerning the Interim Action Plan for
Potential Release Site 21-024(i)
Los Alamos National Laboratory, NM0890010515**

Dear Mr. Taylor and Dr. Browne:

The RCRA Permits Management Program (RPMP) of the New Mexico Environment Department's Hazardous and Radioactive Materials Bureau has reviewed the 21-024(i) Interim Action (IA) Plan (transmittal letter referenced by EM/ER:98-187 and report referenced by LA-UR-98-1896) and is requesting supplemental information (Attachment A). It is requested that the implementation of the IA be delayed until the RPMP concerns in Attachment A are addressed. RPMP suggests a meeting to expedite the resolution of the list of concerns so that LANL/DOE may proceed with the IA. LANL has thirty (30) calendar days of receipt of this letter to respond to RPMP's concerns.

Should you have any questions regarding this letter, please contact myself or Mr. John Kieling, RPMP's LANL Facility Manager, at (505) 827-1558.

Sincerely,

Stephanie Kruse

for Robert S. ("Stu") Dinwiddie, Ph.D., Manager
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau

RSD:jry

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Mr. Taylor and Dr. Browne
June 24, 1998
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cc w/ attachment:

J. Canepa, LANL EM/ER, MS M992
J. Davis, NMED SWQB
B. Garcia, NMED HRMB
M. Johansen, DOE LAAO, MS A316
J. Kieling, NMED HRMB
S. Kruse, NMED HRMB
M. Leavitt, NMED GWQB
H. LeDoux, DOE LAAO, MS A316
D. McInroy, LANL EM/ER, MS M992
D. Neleigh, EPA 6PD-N
J. Parker, NMED DOE OB
S. Yanicak, NMED DOE OB, MS J993
File: HSWA LANL 1/1106/21 21-024(c and i) and 21-027(a)
Track: LANL, doc date, NA, DOE/LANL, NMED-HRMB/Dinwiddie, RE, file

Attachment A:
Request for Supplemental Information for Interim Action Plan for TA-21, PRS 21-024(i)
Activities (former OU 1106, FU 1) dated June 9, 1998

General Comments:

- 1) Los Alamos National Laboratory and the Department of Energy (LANL/DOE) proceeded at risk with field activities in January of 1997 after submitting the Sampling and Analysis Plan (SAP) for Potential Release Site (PRS) 21-024(i). In July of 1997, RPMP submitted a request for supplemental information (RSI) for PRS's 21-024(c,i) and 21-027(a). LANL/DOE responded in part to the RSI comments for 21-024(i) by stating "The sampling analysis plan (SAP) for 21-024(i) has been implemented at risk." In the RSI response, LANL proposes that NMED's comments will be addressed in the proposed voluntary corrective action (VCA) plan and subsequent VCA Report to be submitted to NMED. RPMP has several issues:
 - LANL/DOE has not submitted a report pertaining to the implementation of the unapproved SAP to RPMP. LANL/DOE should submit this report prior to any further activity at PRS 21-024(i).
 - LANL/DOE proposed that a VCA plan and report be submitted to RPMP, not an Interim Action (IA) plan. LANL/DOE should provide the rationale for the change.
 - RPMP believes a final remedy (VCA) may be more appropriate and cost-effective for PRS 21-024(i) at this time and requests that LANL/DOE reconsider this approach.
- 2) LANL/DOE should provide a revised schedule for proposed activities.
- 3) The use of TA-21 baseline background concentrations is not appropriate. LANL/DOE should use the background concentrations listed in the draft site-wide background document titled "Inorganic and Radionuclide Background Data for Soils, Canyons Sediments and Bandelier Tuff at Los Alamos National Laboratory" (Ryti et. al, dated 3/16/98). In addition, LANL/DOE should indicate to which set of background concentrations the acquired data will be compared. However, prior to any comparison, LANL/DOE should identify the matrix (i.e., crushed tuff, soil or sediment) that best describes the fill material prior to making a comparison to the background data set.
- 4) LANL/DOE should provide rationale for not addressing the area outside the PRS "boundary." Figure 9.1-2 indicates radiation "hot spots" on the surface immediately to the south of the dashed PRS "boundary." LANL should include, at a minimum, those "hot spots" outside the dashed PRS boundary. Exclusion of this area from the IA or voluntary corrective action (VCA) would be counter-productive since a potential source for releases¹ to the environment would remain in place. The PRS² includes the septic tank, associated piping, and outfall area, since hazardous wastes/constituents have been routinely and systematically released to the area extending from the outfall down to the canyon floor.
- 5) LANL/DOE should discuss QA/QC sampling (confirmatory sampling, etc.), analytical techniques, field screening techniques (field portable x-ray fluorescence, etc.), detection limits, etc. in the plan.

Specific Comments:

Section 3.1, Description of the Proposed Interim Action

- 6) LANL/DOE should indicate if sampling beneath and adjacent to the vitrified clay pipe (VCP) will be accomplished as it is not clear in the IA plan.
- 7) LANL/DOE should indicate if the septic tank will be decontaminated prior to removal.
- 8) LANL/DOE should define the criteria establishing whether the potentially contaminated removed vegetation is "safe" for chipping and "site restoration soil enhancement."

Section 3.2, Site Restoration

- 9) RPMP is concerned that adding a "1 to 2 in. layer of gravel" on excavated surfaces before backfilling may enhance the potential for water to migrate into the subsurface. Because contamination of the subsurface is indicated by elevated tritium concentrations found at depth in the borehole located south of the septic tank, the potential for mobilization of contaminants due to an influx of subsurface water should be evaluated. LANL/DOE should provide support that the introduction of the gravel will not enhance subsurface movement of water.

Section 3.3, Additional Investigations

- 10) RPMP recommends that while the field team is mobilized, LANL/DOE should not only sample the bench area beneath the mesa top (as proposed) but should also sample to the point on the floor of LA Canyon where the LA Canyon investigation may cover any potential contaminant migration from the mesa top.

Section 4.2, Sampling: Septic Tank and Lines

- 11) LANL/DOE should indicate the depth to tuff at the septic tank and inlet and outlet pipes (perhaps illustrate in a cross-section).

Section 5.0, Maintenance and Inspection

- 12) LANL/DOE should define "periodic inspections and maintenance." For example, LANL should describe if the inspections will occur quarterly, after storm events, etc. and what activities are considered maintenance.

Section 6.2.1, Septic Tank and Lines

- 13) LANL/DOE did not clearly indicate where the septic tank debris and investigation derived waste (IDW) will be disposed. LANL/DOE should not only clearly indicate the location of disposal but should also provide the analytical results and methods for sampling the IDW and septic tank sludge.

- 1 "Solid Waste Management Unit" means any discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).
- 2 "Release" means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous constituents) into the environment (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).
- * Definitions are from the current LANL Hazardous and Solid Waste Amendments Permit.