

ASWALANL 11104(2)
21-029



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GOVERNOR

**State of New Mexico
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ENTERED



PETER MAGGIORE
SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

November 8, 2001

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

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

**RE: REQUEST FOR SUPPLEMENTAL INFORMATION FOR PHASE II RFI
REPORT FOR POTENTIAL RELEASE SITE 21-029, DP TANK FARM.
LOS ALAMOS NATIONAL LABORATORY
EPA ID# NM0890010515
TASK NUMBER HWB-LANL-01-016**

Dear Dr. Browne and Mr. Taylor:

The Hazardous Waste Bureau (HWB) of the New Mexico Environment Department (NMED) has reviewed the Phase II RFI Report for Potential Release Site 21-029, DP Tank Farm dated September 2001 and referenced by LA-UR-01-5254 (ER2001-0720) and requests supplemental information as indicated in the attachment. This corrective action document addresses solid waste management unit 21-029, commonly referred to as DP Tank Farm and fulfills requirements outlined in the NMED Compliance Order (HRM-98-01) issued on June 8, 1998 and the Phase II RFI submittal deadline of September 30, 2001.

LANL must respond to the request for supplemental information within thirty (30) calendar days of receipt of this letter.



10619

Dr. John Browne and Mr. Theodore Taylor
November 8, 2001
Page 2

Should you have any questions or require additional assistance regarding this issue, please feel free to contact Victoria Maranville at (505) 428-2532.

Sincerely,



John Young
LANL Corrective Action Project Leader
Permits Management Program

JRY:vm

cc: J.Davis, NMED SWQB
V. Maranville, NMED HWB
J. Parker, NMED DOE OB
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M. Kirsch, LANL E/ER, MS M992
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File: Reading and ASWA LANL 1/1106/21-029

ATTACHMENT

General Comment

1. LANL may submit revised test and tables to NMED for insertion into the administrative record or attach as an addendum to the Phase II RFI Report.

2. Detection of lead in soil and sediment samples.

The detection of lead in soil and sediment samples collected during the 2000 and 2001 investigation activities are discussed in great detail throughout the Phase II RFI Report. Although it is important to point out that lead was detected in some soil samples; it was only detected at low levels in a few samples and eliminated as a contaminant of concern during the risk screening process. LANL should insert a paragraph in Section 6.0 (page 77) regarding lead, indicating that although lead was detected in soil and sediment samples, based on the risk screening process, lead does not appear to pose a risk to humans or the environment.

Specific Comments

**1. Executive Summary, page iii
Section 1.1 Background, page 1
Section 3.4.1 Summary, page 13**

“The tank farm and two related petroleum hydrocarbon seep areas (western and eastern) in DP Canyon are being addressed under RCRA corrective action and New Mexico Environment Department (NMED) underground storage tank (UST) standards.” AND

“In addition, because DP Tank Farm operated as an underground storage tank (UST) facility, characterization and cleanup activities will meet NMED UST standards (Environmental Restoration Project 1999, 64829).” AND

“The tank farm and two related petroleum hydrocarbon seep areas (western and eastern) in DP Canyon are being addressed under RCRA corrective action and NMED UST standards.”

Point of clarification. In accordance with page 18 of the approved RSI response (G4), PRS 21-029 will be characterized and remediated (if required) in accordance with RCRA corrective action regulations and cleanup will meet UST standards.

2. Executive Summary, page iv, final bullet, page iv

“The primary observation of inspections of the hydrocarbon seep areas in DP Canyon is that there is little physical evidence of hydrocarbon contamination in DP Canyon, particularly in the

last year. Therefore, there is no need to continue the regular inspections of the seeps in DP Canyon."

NMED disagrees with the above statement. The eastern seep was not discovered until March 2000. NMED will consider a reduction of inspection frequency to quarterly for both the western and eastern seep locations; however, this will follow eight (8) consecutive quarters of inspection at which time LANL may request a reduction in frequency (if appropriate). At this time, NMED will not approve LANL to discontinue monitoring of both seeps.

3. Section 3.4.1 Summary, page 15

"No QC samples were collected during the 2000 fieldwork."

Since all samples collected during the 2000 fieldwork were not recollected during the 2001 fieldwork how can the regulatory agency determine if the results are valid. Please provide a clear, concise rationale for using data from 2000 fieldwork.

4. Table 4.2-1 and 4.2-2 Screening Evaluation of Noncarcinogenic COPCs in Mesa Top Soil, page 66

Please clarify Table 4.2-1 as it is not clear. The Table lists two columns of SALs but does not indicate concentration units or type of SAL (residential or 1/10th SAL). An additional column indicating the Hazard Index should also be included for the noncarcinogens. Table 4.2-2 should also reflect applicable changes required for Table 4.2-1.