

TA-21



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Date: May 14, 2004
Refer to: ER2004-0266

Mr. John Young, Corrective Action Project Leader
Permits Management Program
NMED – Hazardous Waste Bureau
2905 Rodeo Park Drive East
Building 1
Santa Fe, NM 87505-6303



SUBJECT: RESPONSE TO THE SECOND NOTICE OF DEFICIENCY FOR THE VOLUNTARY CORRECTIVE ACTION COMPLETION REPORT ADDENDUM FOR SOLID WASTE MANAGEMENT UNIT 21-013(d)-99

Dear Mr. Young:

In response to the New Mexico Environment Department's (NMED's) second notice of deficiency (NOD) for the Voluntary Corrective Action (VCA) Completion Report Addendum for Solid Waste Management Unit (SWMU) 21-013(d)-99, dated 29 April 2004, Los Alamos National Laboratory (the Laboratory) agrees to collect additional samples for chromium, copper, and nickel at the site. However, the Laboratory proposes two modifications to the requested approach:

1. The proposed sample depths include the soil/tuff interface and 2 ft below the soil/tuff interface. Because the soil cover at the site is very thin, the soil/tuff interface is generally within a foot of the ground surface, with the exception of soil pile locations. Therefore, sampling 2 ft below the soil/tuff interface will result in samples being collected from approximately 3 ft below ground surface (bgs). This interval is not deep enough to ensure that the extent of elevated chromium levels is captured. Historical (1994) tuff samples collected to 2.5 ft bgs do not contain elevated chromium, and the 2003 samples collected at these locations were generally collected from 3.5 to 4.5 bgs. Therefore, it is proposed that the deeper resample interval be equal to the original 2003 sample interval.
2. The proposed sample location 21-01937 does not exist. It is assumed this is a typographical error and the intended sample location is 21-01939, which had a chromium detection of 171 mg/kg at 6 to 7 ft bgs. Therefore, location 21-01939 will replace 21-01937 on the resample list.



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If you have any questions, please contact Becky Coel-Roback at (505) 665-5011 or Woody Woodworth at (505) 665-5820.

Sincerely,



David McInroy, Deputy Project Director
Remediation Services
Los Alamos National Laboratory

Sincerely,



David Gregory, Federal Project Director
Department of Energy
Los Alamos Site Operations

DM/DG/RCR/th

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