

TR 21

Darlene Goering

From: Darlene Goering [darlene_goering@nmenv.state.nm.us]
Sent: Friday, November 19, 2004 11:16 AM
To: becky_cr@lanl.gov
Cc: John Young
Subject: RE: SWMU 21-013(d)-99

Becky,

John and I have discussed this and have decided that LANL can present both conclusions, either the Cr/Cu/Ni are a result of a release or a result of a sampling technique, or both if you are unsure. Regardless, the result of the risk assessment should be the same. We would like you to present in the supplemental response to the NOD all field activities, sample methods, analyses, and any other procedures that differ from the original report, in addition to the data and any associated QA/QC. I am glad we can put this matter to rest.

I also want to provide some thoughts on the remediation of MDA V. LANL must completely determine the extent of contamination beneath the absorption beds. At that time, the maximum detected concentration in the soil/tuff can be compared to SSLs. If contaminants exist that may leach to groundwater, those contaminants must be remediated (WQCC regs). I want to reiterate this because you may have to go back to do more remediation, regardless of the risk assessment results, based on this requirement to protect groundwater.

Let me know if you have any questions about these 2 issues.

Darlene Goering
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-----Original Message-----

From: Becky Coel-Roback [mailto:becky_cr@lanl.gov]
Sent: Monday, November 08, 2004 12:17 PM
To: Darlene Goering; John Young
Cc: Becky Coel-Roback
Subject: SWMU 21-013(d)-99

John and Darlene--as I discussed with John this morning, we have received the chromium, copper, and nickel data for the samples that were re-collected at SWMU 21-013(d)-99 in September 2004, per the second NOD. I am attaching a summary spreadsheet of preliminary data for your information. Please keep in mind that the data are draft. In the spreadsheet, the LANL background values are provided, and results exceeding background are shown in bold. The data show significantly lower concentrations of Cr/Cu/Ni than were observed in samples collected during February 2003. As specified in our response to the second NOD, the samples were collected at two depth intervals at each location: 1) the soil-tuff interface, and 2) the same depth in tuff as the original sample.

John and I were talking about the best way to close out this issue. Our (meaning LANL's) proposed approach is to report the data and conclusions as a supplemental response to the second NOD. However, I am open to suggestions. John and I also discussed two potential conclusions that can be drawn:

1) The Cr/Cu/Ni contamination exists, but is of limited extent. Therefore, we can use the original risk screening results, which indicate that there is no risk using a residential scenario.



2) The Cr/Cu/Ni "contamination" is an artifact of the 2003 sampling method. In this case, we need to present all of the information we have to back up this conclusion (i.e., operational history, previous sampling data [1994], resampling data [2004], and the fact that we see it in only the western half of the site, where we used a different sampling approach than the eastern half). We would also have to redo the risk screening, which again will pass residential.

Obviously, the first approach is easier and the second a little more rigorous. Please let me know how you would like us to proceed, and we will respond ASAP.

Thanks!
Becky