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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

February 4, 1997

Mr. G. Thomas Todd, Area Manager
Los Alamos Area Office
Department of Energy
528 35th Street
Los Alamos, New Mexico 87544

**RE: Request for Additional Information
NOD Response to RFI Report
Potential Release Site 31-001
Los Alamos National Laboratory
NM0890010515**

Dear Mr. Todd:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department has reviewed the NOD Response to RFI Report for Potential Release Site 31-001 dated November 28, 1995 and referenced by EM/ER:95-660. HRMB, hereby, requests that the Los Alamos National Laboratory (LANL) provide additional information to address the concerns identified in Attachment A.

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

Sincerely,

A handwritten signature in cursive script that reads "Robert S. Dinwiddie".

Robert S. ("Stu") Dinwiddie, Manager
RCRA Permits Management Program

RSD:kth

attachment



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Mr. G. Thomas Todd
February 4, 1997
Page 2

cc: T. Davis, NMED HRMB
B. Garcia, NMED HRMB
T. Glatzmaier, DDEES/ER, MS M992
B. Hoditschek, NMED SWQB
J. Jansen, LANL ER, MS A316
M. Johannsen, LAAO, MS A316
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S. Yanicak, NMED DOE OB, MS J993
K. Zamora, LAAO, MS A316
File: LANL HSWA FU /OU /TA 31/31-001

ATTACHMENT A
NOD Response to RFI Report
Potential Release Site 31-001
November 28, 1995

General Comment: LANL needs to provide detailed figures or photographs of the area to be remediated within the VCA plan and the final report. The actual area remediated for this site was approximately 6 feet long, but width and depth are not provided in the report. In Figure 4, the blow-up of the area shows a site approximately 1/2 inch in size. Surely, LANL can provide a more detailed figure of the actual excavation. LANL might also provide a photograph with a scale showing the site after excavation.

Comments on Voluntary Corrective Action Plan for Site under Field Unit 1 at TA-31, East Receiving Yard: 31-001, Septic System Outfall, June 9, 1995

1. **Table 7-1, Description of Confirmatory Sampling, p. 10:** The analysis method for metals is indicated as Toxicity Characteristic Leaching Procedure (TCLP) and also EPA Method 6010 which is an Inductively Coupled Plasma Atomic Emission Spectroscopy method. The use of TCLP for confirmation sampling is inappropriate, and should only be used for a hazardous waste determination. In the final VCA report (dated September 22, 1995) target analyte list metals were used rather than TCLP.
2. **Methodologies for Developing Site-Specific Preliminary Remedial Goals to Demonstrate Clean Closure, p. E-3:** For an industrial exposure scenario, LANL should back-calculate a soil concentration for carcinogens from a target cancer risk value of 10^{-6} rather than the 10^{-4} which was indicated in this document.

Comments on Voluntary Corrective Action Completion Report, Potential Release Site 31-001, Septic System Outfall, September 22, 1995

3. **Corrective Action, p. 23:** Text indicates that due to the extreme slope, backfilling and reseeded were considered to be ineffective. There are other means of stabilizing a slope, and this slope should have been stabilized following the excavation of the soil. LANL needs to provide a plan for stabilizing the slope or information related to how the slope was stabilized.

4. **Corrective Action, p. 23:** Text indicates that field screening did not indicate the presence of volatile organic vapors above background levels. To support this statement, LANL should provide the detection limits for the field screening devices used for volatile organics.

5. **Corrective Action, p. 23-24:** Text is confusing in regards to the number of confirmatory samples collected and the analysis conducted. Text on page 23 indicates two confirmatory samples were collected from the excavated area, and analysis was conducted for PCBs, and TAL metals. Text on page 24, indicates that three confirmatory samples were collected and analysis was only for PCBs. LANL needs to clarify the confirmation sampling and analysis which was conducted and supply all analytical results.

In addition, polycyclic aromatic hydrocarbons were found at this site above action levels. LANL indicates that these should have been remediated with the other materials; however, confirmatory sampling must be provided to substantiate this premise.

6. **Corrective Action, p. 24:** The depth and width of excavation should be provided. LANL indicates that material was removed to the tuff, but the depth is not included.