



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544



MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 21, 1997

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

Dr. Sigfried Hecker, Director
Los Alamos National Laboratory
P. O. Box 1663, MS A100
Los Alamos, New Mexico 87545

RE: Request for Supplemental Information
RCRA Facility Investigation
33-002(a-e) Material Disposal Area K
Los Alamos National Laboratory
NM0890010515

Dear Mr. Todd and Dr. Hecker:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department has reviewed the Response to Notice of Deficiency for 33-002(a-e) Material Disposal Area K dated May 2, 1996 and referenced by EM/ER:96-229 and found it to be insufficient. LANL must respond to the supplemental information request noted in Attachment A within 30 days of the receipt of this letter.



4767

76

Mr. Todd and Dr. Hecker
July 21, 1997
Page 2

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,



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

RSD:kth

attachment

cc w/ attachments: T. Baca, LANL EM-DO, MS J591
T. Davis, NMED HRMB
B. Garcia, NMED HRMB
T. Glatzmaier, LANL DDEES/ER, MS M992
K. Hill, NMED HRMB
J. Jansen, LANL EM/ER, MS M992
M. Johansen, DOE LAAO, MS A316
J. Kieling, 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. Pierce, NMED SWQB
G. Saums, NMED SWQB
T. Taylor, DOE LAAO, MS A316
S. Yanicak, NMED DOE OB, MS J993
File: Reading and HSWA LANL 3/1122/33/33-002(a-e)
Track: LANL, doc date, NA, DOE/LANL, HRMB/kth, RE, file

ATTACHMENT A
Request for Supplemental Information
RCRA Facility Investigation Report
33-002(a-e) Material Disposal Area K

The following potential release sites were presented in this document: 33-002(a-e).

LANL may submit a Class 3 permit modification for 33-002(e) based on the document of Understanding No Further Action Criterion 2.

GENERAL COMMENTS

1. LANL shall provide a summary of all analytical data regardless of non-detectable concentrations.
2. For each inactive septic tank, LANL shall remove or, at a minimum, backfill the tank with a solid, non-porous material (such as flow crete). However, any action other than removal of the tank and associated lines may not be considered as a final disposition appropriate for no further action.
3. In order to address Water Quality Control Commission concerns, LANL shall, at a minimum, plug outfall piping at the origin and remove all associated piping.

SPECIFIC COMMENTS

4. **33-002(a):** The Administrative Authority recommends that LANL perform an interim action to remove the contents of the septic tank.
5. **33-002(b):** LANL shall submit a schedule for the Phase II fieldwork.
6. **33-002(c):** LANL shall submit a schedule for the Phase II fieldwork.
7. **33-002(d):** Contaminants are present at this PRS above UTL. Therefore, LANL must conduct additional sampling at depth for this PRS. LANL must submit a Phase II SAP.
8. **Appendix C Ecotoxicological Screening Assessment:** LANL shall revise the text to indicate that the ecotoxicological screening conducted at TA-33 follows the approach agreed upon by the New Mexico Environment Department, Environmental Protection Agency, and the Department of Energy.