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*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**  
*Hazardous & Radioactive Materials Bureau*  
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**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 and Additional Work  
RCRA Facility Investigation Report  
Technical Area 33  
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 Notice of Deficiency Response for Technical Area 33 dated May 24, 1995 and found it to be insufficient. LANL must respond to the supplemental information request noted in Attachment A and provide a schedule for the requested additional work within 30 days of the receipt of this letter.



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Mr. Todd and Dr. Hecker  
July 21, 1997  
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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  
L. Roberts, EPA 6EN-AT  
G. Saums, NMED SWQB  
T. Taylor, DOE LAAO, MS A316  
S. Yanicak, NMED DOE OB, MS J993  
File: HSWA LANL 3/1122/33/33-004(d, g-i), etc.  
Track: LANL, doc date, NA, DOE/LANL, HRMB/kth, RE, file

**ATTACHMENT A**  
**Request for Supplemental Information and Additional Work**  
**Notice of Deficiency Response**  
**Technical Area 33**  
**May 24, 1995**

The following potential release sites were presented in this document: 33-004(d, g-i), 33-005(a-c), 33-007(c), 33-010(e-f), 33-011(a, e), 33-012(a) and 33-015.

**GENERAL COMMENTS**

1. LANL shall provide a summary of all analytical data regardless of non-detectable concentrations.
2. LANL may submit a Class 3 permit modification for the 33-010(e) under the Document of Understanding No Further Action Criterion 5.

**SPECIFIC COMMENTS**

1. **33-004(i) Outfall:** LANL must include lead within the screening risk assessment for 33-017 since it is attributable to the vehicle maintenance area.
2. **33-005(a-c) Septic System, Industrial Drainline and Leachfield associated with TA-33-21:** LANL did not respond to the information requested in the Notice of Deficiency (NOD) dated April 22, 1995 regarding blank contamination. LANL must report all laboratory contamination in the RFI Report tables and identify them with a qualifier ("B").
3. **33-004(d) Septic System:** LANL must conduct additional sampling at depth for this PRS. LANL must submit a Phase II SAP.
4. **33-004(g) Outfall:** LANL must conduct additional sampling that includes analyses for VOCs and sampling at depth for this PRS. LANL must submit a Phase II SAP.
5. **33-004(h) Warehouse Outfall:** LANL must conduct additional sampling at depth for this PRS. LANL must submit a Phase II SAP.
6. **33-010(f) Surface Disposal:** Since the piles are located on the slopes of a tributary, LANL must collect samples in the drainageway and analyze them for inorganics, semi-volatile organic compounds, pesticides and PCBs. LANL must submit a sampling and analysis plan (SAP) for this PRS.

7. **33-011(e) Drum Storage Area:** LANL must at a minimum use aerial photographs, other available historical information, interviews, etc. to determine the location of the drums. In addition, LANL must also resample the drum storage area for inorganics, SVOCs, and volatile organic compounds. LANL must submit a SAP to address these concerns.
8. **33-012(a) Drum Storage:** The polychlorinated biphenyl (PCB) action levels presented for this PRS does not represent the Environmental Protection Agency's position on PCB action levels. Depending on site-specific considerations, the Regional Administrator may determine that a different action/cleanup level is more protective than those presented. Environmental Protection Agency (EPA) Region 6 has a policy requiring cleanup of PCBs in any drainage areas or areas leading to surface water of 1 part per million in soil. Official notification of identified PCBs should be made to the Toxic Substance Control Act (TSCA) personnel. [See EPA Comments on Draft LANL Guidance, Cleanup of Polychlorinated Biphenyls dated May 8, 1995, and EPA letter dated September 20, 1995, PCB Spill Cleanup Policy.]
9. **33-015 Incinerator:** LANL must revise the screening assessment for this PRS based on recent regulatory guidance [Risk Assessment Guidance for Superfund Volume I, Human Health Evaluation Manual (Part A) pp.8-12, 8-13. OSWER 9285.7-01A, December 1989].
10. **33-007(c) Firing Area:**
  - a. LANL shall conduct a Phase II investigation to determine the nature and extent of contamination found above background and UTLs.
  - b. The AA recommends that LANL perform an interim action to remove the uranium chunks at this PRS.
11. **33-011(a) Storage Area:** LANL must revise the screening risk assessment to include PAHs. The PAH levels detected are not comparable to the urban values presented in "*Background Levels of Polycyclic Aromatic Hydrocarbons (PAH) and Selected Metals in New England Urban Soils*" [EPA letter to Mr. Taylor dated May 19, 1995: Evaluation of Interim Guidance for Evaluating Polycyclic Aromatic Hydrocarbons in Soil].