

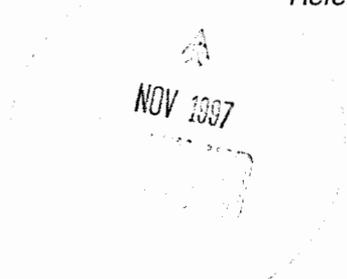
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Stu

Date: November 14, 1997
 Refer to: EM/ER:97-478



Mr. Benito Garcia
 NMED-HRMB
 P.O. Box 26110
 Santa Fe, NM 87502

SUBJECT: RESPONSE TO REQUEST FOR SUPPLEMENTAL INFORMATION FOR THE RFI REPORT FOR TA-33, PRSs 33-002(a-e), MATERIAL DISPOSAL AREA K (FORMER OU 1122)

Dear Mr. Garcia:

The Environmental Restoration Project received your letter dated September 11, 1997, in which you approved a request for extension for supplemental information on the Resource Conservation and Recovery Act Facility Investigation Report for Technical Area 33, Potential Release Sites 33-002(a-e), Material Disposal Area K. In your letter, you indicated that a response should be received from the Los Alamos National Laboratory no later than November 15, 1997. Enclosed please find our response to your request.

Should you have any questions, please contact Roy Michelotti at (505) 665-7444 or Joe Mose at (505) 667-5808.

Sincerely,

Julie A. Canepa, Program Manager
 LANL/ER Project

Sincerely,

Theodore J. Taylor, Program Manager
 DOE/LAEO

HSWA LANL- 3/1/97/33-002(a-e)

TV



JC/TT/gmn

Enclosure: Response to Request for Supplemental Information for RFI Report for
TA-33, Material Disposal Area K

Cy (w/enc.):

D. Griswold, AL-ERD, MS A906
J. Harry, EES-5, MS M992
R. Michelotti, CST-7, MS E525
J. Mose, LAAO, MS A316
D. Neleigh, EPA, R.6, 6PD-N
C. Rodriguez, CIO/ER, MS M769
T. Taylor, LAAO, MS A316
J. White, ESH-19, MS K490
S. Dinwiddie, NMED-HRMB
M. Leavitt, NMED-GWQB
J. Parker, NMED-HRMB
G. Saums, NMED-SWQB
S. Yanicak, NMED-AIP, MS J993
RPF, MS M707

Information Only (w/o encls)

T. Baca, EM, MS J591
T. Glatzmaier, DDEES/ER, MS M992
T. Longo, DOE-HQ, EM-453
D. McInroy, EM/ER, MS M992
J. Plum, LAAO, MS A316
S. Rae, ESH-18, MS K497
G. Rael, AL-ERD, MS A906
J. Vozella, LAAO, MS A316
EM/ER File (CT# C327), MS M992
EM/ER File, MS M992

**RESPONSE TO REQUEST FOR SUPPLEMENTAL INFORMATION REGARDING
"RCRA FACILITY INVESTIGATION REPORT
TA-33, PRSS 33-002(A—E), MATERIAL DISPOSAL AREA K"**

GENERAL COMMENTS

1. LANL shall provide a summary of all analytical data regardless of non-detectable concentrations.

Response: As per an October 22, 1997, telephone agreement between Tracy Glatzmaier of LANL and John Kieling of NMED, summaries of 1993 analytical data are provided for all PRSs discussed in the September 1995 MDA K RFI Report.

The data are provided on floppy disk in Excel 4 format as Addendum 1 to this response. Two copies of each PRS file are provided. One copy is locked as a read-only archival file. The other copy is provided in an unlocked file for the convenience of NMED when inspecting the data. The data include sample ID, request number, analytical suite, analytical result and qualifier (if any), and units.

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.

Response: There is only one septic tank at MDA K. The tank has been cleaned and plugged (see item 4 below). NMED has been informed of this work (Attachment A).

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.

Response: Both inflow and outflow pipes were removed at the tank and the pipe orifices at the tank were plugged during the cleaning described in response to item 4 below.

SPECIFIC COMMENTS

4. **33-002(a):** The administrative Authority recommends that LANL perform an interim action to remove the contents of the septic tank.

Response: The septic tank at MDA K [PRS 33-002(a)] was deactivated and cleaned in September-October 1997 as an institutional interim measure. The tank was sampled prior to removal of contents. All contents were pumped out, and the tank was steam cleaned several times. The inlet and outlet pipes were removed and their orifices plugged at the tank. At this writing, the tank is awaiting final disposition. A report will be sent to NMED at the conclusion of the work, as proposed by e-mail from Roy Michelotti (CST-7) to John Kieling (NMED) (Attachment A). All data and the fate of the tank will be provided in the NFA report for PRS 33-002(a).

5. **33-002(b):** LANL shall submit a schedule for the Phase II field work.

Response: Phase II fieldwork for bounding the extent of tritium below the sump and for checking for contamination by inorganic chemicals, VOCs, and SVOCs was completed in FY 96. The Phase II report for PRS 33-002(b) was submitted to NMED in September 1997 with a recommendation for NFA. A copy of the 33-002(b) section of that report is provided as Attachment B to this response.

6. **33-002(c):** LANL shall submit a schedule for the Phase II field work.

Response: Phase II fieldwork for bounding the extent of tritium below the sump and for checking for contamination by inorganic chemicals, VOCs, SVOCs, and plutonium was completed in FY 96. The Phase II report for PRS 33-002(c) was submitted to NMED in September 1997 with a recommendation for NFA. A copy of the 33-002(c) section of that report is provided as Attachment C to this response.

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.

Response: Because a borehole was drilled at PRS 33-002(d) in 1993, LANL believes that additional subsurface sampling is not needed at this PRS. As part of the 1993 investigation of a subsurface tritium plume at MDA K, Borehole 33-1230 was located in the 33-002(d) drainage. In the MDA K RFI Report, this borehole was discussed under PRS 33-002(a) because PRS 33-002(d) is located within the boundaries of PRS 33-002(a) and because Borehole 33-1230 was part of a broader investigation at MDA K. Borehole 33-1230 was specifically located in the PRS 33-002(d) drainage to address contamination that may have come from the outfall and to determine if the outfall may have been the source of the tritium plume.

Borehole 33-1230 is located approximately 25 ft downslope from sample point AAA1942. Analyses of the cores for inorganics, radionuclides, SVOCs, and VOCs (except the surface sample) were performed at 10-ft intervals in the upper 30 feet of the borehole and at 30-ft intervals thereafter to a total depth of 230 ft. Details of the core drilling are presented on pages 18 and 26 of the MDA K RFI Report. Cadmium (3.6 mg/kg), chromium (57 mg/kg), lead (48 mg/kg), and uranium (8.09 mg/kg) were found at the surface. Uranium (5.16 mg/kg) was found at 30 ft and antimony (23 mg/kg) was found at 217 ft but not in any samples above. Trace levels of plutonium were found at 10 ft. (A plutonium spill occurred at Main Site in 1960, resulting in plutonium activities above LANL background UTLs at Main Site.) LANL feels that, while these concentrations are above UTLs, contamination is well below SALs, not widespread, and is bounded by the borehole and surface sampling.

LANL sincerely believes that Borehole 33-1230 sufficiently addresses the question of subsurface contamination at PRS 33-002(d) and requests that NMED reconsider the need for a SAP. If, after reviewing the arguments presented above, NMED still believes that a SAP is necessary, LANL requests a more specific statement of NMED concerns.

8. Appendix C Ecotoxicological Screening Assessment: LANL shall revise the text to indicate that the ecotoxicological screening at TA-33 follows the approach agreed upon by the New Mexico Environment Department, Environmental Protection Agency, and the Department of Energy.

Response: Field Unit 3 withdraws Appendix C. TA-33 will be included in the LANL Environmental Restoration Project's sitewide Ecotoxicological Screening Assessment when the methodology is agreed upon by all parties.

ATTACHMENT A

E-mail communication from Roy Michelotti (CST-7) to John Kieling (NMED)
concerning the septic tank at PRS 33-002(a).

John Kicling
HRMB/NMED
fax 827-1544

Dear John,

Per a discussion I had with Dave McInroy and Pat Shanley, we agreed to this expeditious and informal communique as a follow up to our 9/19/91 phone conversation. This note is to further advise you of work being performed in two PRSs at TA-93. We are conducting BMPs at two septic system PRSs, 33-002(a) and 33-004(a). The contents of the tanks will be removed from both units, and the tanks will be decontaminated. Waste disposal decisions will be based on the results of waste characterization data.

PRS 33-002(a) is the unit which overflowed earlier this summer, and NMED sampled the contents. This unit has been taken out of service by the operating group. ER is sealing the inlet and outlet pipes, a decision on the final disposition of the tank is pending.

PRS 33-004(a) is an active unit which is suspected to have been leaking. LANL ER is working with the facility management organization to inspect the tank and piping for leaks. If we discover stained soil during this inspection we will remove it, characterize it, and dispose it properly. Based on previous RFI data we do not expect to encounter any soil with contamination above human-health risk-based criteria.

We will provide you with an informal summary report when this activity is completed. This will include waste volumes and waste disposal decisions. All information pertaining to these actions will be included in final decision reports on these units.

If you have any questions please contact me directly at 665-7444.

Sincerely,
Roy

cy:
Dave McInroy
Joe Mose
Pat Shanley

ATTACHMENT B

PRS 33-002(b) Section of the TA-33 September 1997 Phase II report.