



Department of Energy
 Field Office, Albuquerque
 Los Alamos Area Office
 Los Alamos, New Mexico 87544

Barbara X
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LANL
 REF 92

AUG 11 1992



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Edward Horst, RCRA Program Manager
 Hazardous and Radioactive Materials Bureau
 State of New Mexico Environment Department
 Harold Runnels Building
 1190 St. Francis Drive, P. O. Box 26110
 Santa Fe, NM 87502

Dear Mr. Horst:

The purpose of this letter is to request an extension to the 30-day deadline for responding to your letter dated July 7, 1992, denying our clean closure equivalency demonstration at the Technical Area (TA)-35 TSL-125 surface impoundment. On July 22, 1992, personnel from Los Alamos National Laboratory's (LANL) Environmental Restoration (EM-13) and Analytical Chemistry (EM-9) groups and James Nunz, representing this office, met with Stephanie Stoddard and Teri Davis of your staff to discuss your concerns. By the end of the meeting we had agreed to provide your staff with a number of documents designed to address the issues raised in your letter, and I would like to suggest that we supply these documents, in the form of a complete response package, by September 4, 1992.

Two distinct concerns, expressed in your letter, were discussed at the meeting: 1) we have not demonstrated that releases from the unit impacting surrounding soils or surface water are below health-based levels; and 2) the vertical extent of contamination has not yet been determined.

We agreed in the meeting that the surrounding soil has not been adequately sampled; a sampling plan has been prepared in cooperation with your staff to address this issue; and a final version will be submitted for your approval in the September 4, 1992 package. Once the sampling plan has been executed, we will compare the data to health-based action levels and submit a report.

Concerning the second issue, it became clear in the meeting that the summary table we supplied in Enclosure 4-F of the closure report contains a typographical error which led your staff to believe that 26 ppb of 1,1,2-trichloro-1,2,2-trifluoroethane remained in the bottom of corehole number one. Upon examination of the actual LANL data, it was discovered that this compound was actually below detection limits (<5 ppb) at the 55 foot



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depth, and that the summary table was wrong. To ensure that this kind of error does not occur again, EM-9 has revised their procedures to maintain control over the creation of data summary tables (i.e., a summary table, prepared by EM-9 rather than a subcontractor, will be submitted with every data package), and the same four signatures that guarantee the quality of the LANL data will henceforth appear on summary tables as well.

To further clarify the vertical extent of contamination, EM-13 staff are preparing an analysis and graphical representation of the data for your review which we believe demonstrates that the vertical extent of contamination is well-characterized (particularly in light of the aforementioned typographical error). This will also be provided in the upcoming response package.

Verification sampling at the TA-35 TSL-125 surface impoundment was one of the first opportunities LANL has had to determine the vertical extent of contamination in the highly efficient and accurate manner available with a mobile gas chromatograph/mass spectrometer (GC/MS). Field personnel were directed to drill and sample until the mobile lab indicated that the vertical extent of contamination had been delineated. Because this data was only used to guide field operations (i.e., as a screening tool), they were not reported. However, your staff has expressed an interest in reviewing this data and it will be provided in the response package.

Finally, meeting participants agreed that a general discussion of hydrogeology and implications for contaminant transport would be mutually beneficial. Larry Maassen of EM-13 will coordinate this meeting with your staff.

To summarize, we need until September 4, 1992, to transmit a response package, intended to address your concerns with closure activities at TA-35, TSL-125, that will consist of the following:

- 1) A final sampling plan for soils adjacent to the surface impoundment;
- 2) A discussion and graphical representation of the vertical extent of contamination underneath TSL-125; and
- 3) Mobile GC/MS data.

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I sincerely hope that you find this proposed action in response to your letter satisfactory, and we look forward to a detailed discussion of hydrogeology with your staff in the near future.

Sincerely,



Jerry L. Bellows
Area Manager

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CC:

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Tom Gunderson, EM-DO, LANL, MS K491

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