

FILE  
LANL RED 92



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

NOV 3 - 1992

Barbara Hoditschek  
Permitting Program Manager  
Hazardous and Radioactive Materials Bureau  
NMED  
525 Camino de Los Marquez  
Santa Fe, New Mexico 87502

Dear Ms. Hoditschek:

This is in response to the New Mexico Environment Department's (NMED's) request for clarification of the activities associated with the Resource Conservation and Recovery Act Closure of a surface impoundment in Technical Area 35 (TA-35). Specifically, NMED asked for an explanation in writing of the discrepancies between the Closure Report for the surface impoundment (TA-35 TSL-125) and a Notice of Deficiency (NOD) response letter dated March 16, 1992, for the same unit. The discrepancy was that the NOD response stated that "Metals were not analyzed in the corehole sampling because metals were not detected in previous sampling events." In fact this statement should have read "Metals were not analyzed in the corehole sampling because metals were not detected in previous sampling events above the analytical laboratory's limits of quantification (LOQ), naturally occurring background levels or above calculated health-based action levels."

One metal (beryllium) was not detected above the LOQ, but LANL decided to compare all LOQs to the health-based action level for each metal. Only in this one case did the LOQ exceed the action level. For this reason LANL felt obligated to further investigate or resample this constituent and attempt to obtain a lower detection limit. Further investigation revealed that beryllium was never used at this building. Through knowledge of process (KOP), this metal was eliminated as a potential contaminant at the site. The KOP information, the analyses and all health-based calculations for the constituents in question have been submitted to NMED.



5086

2

Barbara Hoditschek

2

NOV 3 - 1992

Should you have any questions feel free to contact Jon Mack,  
ES&H Branch, at (505) 665-5026.

Sincerely,



Joseph C. Vozella, Acting Chief  
Environment, Safety and Health  
Branch

LESH:4JM-027

cc:

S. Slaten, ES&H, LAAO  
T. Gunderson, EM-DO, LANL,  
MS K491  
D. McInroy, EM-8, LANL,  
MS K490