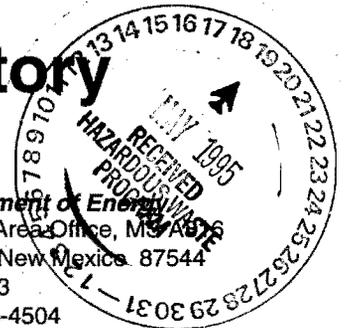


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Ms. Barbara Hoditschek
Permit Program Manager
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, NM 87502

Date: MAY 10 1995
Refer to: EM/ER:95-239

**SUBJECT: COMMENTS ON THE CLOSURE PLAN FOR TECHNICAL AREA (TA)
35 TEN SITE LOCATION (TSL) - 85 SURFACE IMPOUNDMENT SITE
AT LOS ALAMOS NATIONAL LABORATORY**

Dear Ms. Hoditschek:

The following are comments to the Amended Closure Plan, modified March 31, 1995 for TA-35 TSL 85 surface impoundment at Los Alamos National Laboratory (Laboratory).

Closure activities have been in process at this site for a number of years and a brief history is included below.

December 1991 - a closure certification report prepared by Benchmark Environmental Corp. was submitted to the New Mexico Environment Department (NMED) for approval of a clean closure equivalency demonstration. Included in the report was the interim status closure plan which had not yet been approved.

June 21, 1993 - the closure plan was disapproved by NMED with reasons attached.

October 1993 - the Amendment to the Closure Plan was submitted by the Laboratory to NMED. The Amendment addressed the reasons for NMED's disapproval.

May 5, 1994 - a Notice of Deficiency (NOD) was issued by NMED on the Amendment to the Closure Plan.

June 8, 1994 - the Laboratory submits response to the NOD and requests 30 and 60 day extensions for three items.



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June 24, 1994 - NMED approves extensions.

July 8, 1994 - the Laboratory submits two reports regarding background data meeting 30 day extension.

August 5, 1994 - the Laboratory submits report addressing analytical interference meeting 60 day extension.

April 10, 1995 - NMED issues an Amended Closure Plan dated March 31, 1995.

The March 31, 1995 Amended Closure Plan contains some new text, however the bulk of the plan is a compilation of the interim status closure plan and the October 1993 Amendment to the Closure Plan submitted by the Laboratory. Section 1 through 4 and 7 through 8 were taken from the interim status closure plan. Sections 5, 6, and 9 were taken from the 1993 Amendment. The new Amended Closure Plan does not address the Laboratory's responses submitted to the May 1994 NOD including the proposed methods to resolve the dielectric oil interference of the semi-volatile organic (SVOC) analyses. This method was proposed in the Laboratory's response to the NOD and must be used to prevent interference in additional samples collected at the site to verify clean closure.

As described in the December 1991 Closure Certification Report and the October 1993 Amendment to the Closure Plan, the Laboratory has completed the majority of closure activities at TSL-85. These activities include completing five sampling phases of the closure plan. The Laboratory has also removed all standing liquids, wastes and waste residues from the surface impoundment, the inactive underground storage tank, and their associated structures and removal of surrounding soil contaminated with hazardous constituents. All removed waste residues, contaminated systems, structures, and equipment were managed as hazardous waste.

Due to the fact that the majority of closure activities has already occurred and the amount of correspondence that has been exchanged over the years, the Laboratory believes that the March 31, 1995 Modified Closure Plan is not necessary. The Laboratory, instead requests approval of the October 1993 Amendment to the Final Closure Plan with the NOD responses incorporated so that the closure can proceed without further delays.

The Laboratory's specific comments to the March 31, 1995 Amended Closure Plan for TA-35 TSL-85 are listed below. All documents referenced should be considered as part of the Laboratory's comments.

1. NMED should approve and include the Laboratory's responses to the May 1994 NOD in the Amended Closure Plan. Without including these responses, the NMED may again have the same concerns noted in the NOD. Copies of the Laboratory's responses to the NOD are attached.

2. March 31, 1995 Amended Closure Plan, Section 1.0 , Introduction, page 1-1, paragraph 3:

The modified closure plan states 'All soil with contamination above the "non-detect level" will be removed as part of this closure effort.'

This sentence infers that all contaminated soils will be removed and does not consider risk assessment evaluation. The words "non-detect level" should be deleted and the sentence should read that "all soil with contamination exceeding health based action levels will be removed."

3. March 31, 1995 Amended Closure Plan, Section 5.6, ANALYSIS NOT PERFORMED AT THE LABORATORY'S EM-9, page 5-4, paragraph 5:

This section was added to the plan and states that those Appendix VIII constituents that the Laboratory's EM-9 does not have the capability to perform will be sent to an Environmental Protection Agency (EPA) recognized independent laboratory capable of performing the analysis for the constituents in question.

This statement does not address the fact that analytical methods are not available for many of the Appendix VIII constituents. This issue was addressed in the response to the May 1994 NOD Item 5 and is included as an attachment to these comments.

"Based on a review of relevant documentation for other Resource Conservation and Recovery Act (RCRA) regulated sites at the Laboratory facility, as well as, research on the analytical capabilities of an analytical laboratory that performs contract work under EPA's Contract Laboratory Program (CLP), it is proposed that all additional samples associated with the TSL-85 surface impoundment be analyzed for the standard suite of analytes for volatile organic compounds (VOCs) by Method 8260, SVOCs by Method 8270, polychlorinated biphenyls (PCBs) by method 8080, total metals by Method 6010, and toxicity characteristic leaching procedure metals by method 1311 as specified in "Test Methods for Evaluating Solid Waste" (SW-846) (U.S. EPA, 1992). It is strongly believed that this approach will adequately reflect site conditions and will result in identifying all constituents present at the TSL-85 site that may be of concern. In addition, it is proposed that gel permeation chromatography (GPC), SW-846 Method 3640 be performed for all samples prior to analyses for individual analytes. GPC a size exclusion procedure, will be used to separate hydro carbon oils, if present, from SVOCs. All resulting

tentatively identified compounds and J-flags, if any will be addressed in accordance with SW-846 protocol.

This proposal is based, in part, on the knowledge that accepted analytical techniques and methods are not available for a large number of Appendix VIII constituents. Attachment 1 includes a record of telephone conversation with Joan Fisk of EPA, as well as, a copy of a letter from Craig Leasure of the Laboratory's Environmental Chemistry Group (CST-9) to Robert Vocke of the Laboratory's Environmental Restoration and Waste Management (ERWM) Program dated June 4, 1993 regarding this issue.

In addition, this proposal is based on the fact that this proposed approach is consistent with the approaches accepted by NMED or EPA, Region VI, for other RCRA units at the Laboratory facility. Most recently, approval of clean closure demonstration was granted by NMED for the TSL-125 surface impoundment at TA-35 (refer to Attachment 2). Samples associated with this clean closure demonstration were analyzed for VOCs by Method 8240, SVOCs by Method 8250 or Method 8270, PCBs by modified Method 8080, total metals by Method 6010, and metals by the extraction procedure toxicity test (Method 1310) using SW-846 standard analytical methods and protocol. The Laboratory's Operable Unit 1148 work plan was approved by EPA, Region VI, in December 1993. This work plan specified use of the EPA's CLP target analyte lists for VOCs and SVOCs as well as analyzing for metals, pesticides, and PCBs according to SW-846 protocol. Copies of the approval letter and the relevant text in the response to EPA's NOD are included as Attachment 3.

If this proposal is approved, Tables 3-2 through 3-5 of the Amendment to the Closure Plan for TSL-85 will be revised to reflect the standard suite of analytes, as represented in SW-846, for each category of analyses (e.g., VOCs, SVOCs) and will be included in the revised Amendment to the Closure Plan for TSL-85 to be submitted to NMED."

4. March 31, 1995 Amended Closure Plan, Section 7.0, CLOSURE DESIGN, page 7-1, paragraph 2:

The Modified Closure Plan states 'The Laboratory plans final closure for this area by the spring of 1995.'

Due to the delay in the approval of the final closure plan, the Laboratory plans to submit the final closure report for this area by the summer of 1996. This assumes that NMED will approve the March 31, 1995 Amendment by the end of May 1995.

5. March 31, 1995 Amended Closure Plan, Section 7.2.1, Leak Testing, Decontamination, and Removal of the Underground Storage Tank and Piping, page 7-2, paragraph 5:

The Modified Closure Plan states "Due to the fact that there is an occupancy of multiple hazardous waste constituents present in the soil at the closure, PCB values must be included in the calculation during risk assessment for aggregate risk or for the hazard index. The maximum concentration of PCB's detected in the soils was 1.1 Parts per million (ppm). NMED standards are .09 or .9 ppm. The Laboratory will resample the site to determine if further removal of contaminated soil and equipment is required to meet these standards."

NMED does not state what standards are .09 or .9 ppm. The Laboratory requests clarification of these standards.

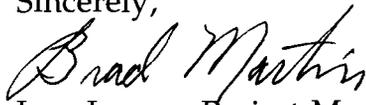
6. March 31, 1995 Amended Closure Plan, Section 9.0, PROPOSED SCHEDULE, page 9-1, paragraphs 1 and 2

The dates shown in Figure 14 assumed that NMED would approve the Amendment to the Closure Plan by March 1994. Since the amended closure plan has not yet been approved these dates are no longer valid. The proposed schedule, provided as Figure 14, will commence upon receipt of a notice of approval of this Amended Closure Plan from NMED and the milestone dates should be adjusted accordingly.

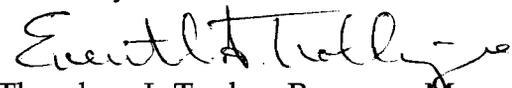
7. The Amended Closure Plan should describe the work that has already been completed at the site including the removal of the underground storage tank, removal of the surface impoundment, and completion of Phase I through V sampling activities.

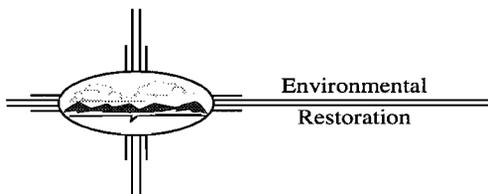
Should you have any questions regarding these comments, please contact Mr. Roy Bohn of the Laboratory's Environmental Restoration Project at (505) 665-5138.

Sincerely,


Jorg Jansen, Project Manager
Environmental Restoration

Sincerely,


Theodore J. Taylor, Program Manager
Los Alamos Area Office



JJ/TT/bp

Enclosures: a/s

Cy (w/enc.):

- R. Dinwiddie, NMED
- B. Driscoll, USEPA
- C. Fesmire, LAAO, MS A316
- D. Griswold, ERD, AL, MS A906
- D. McInroy, EM/ER MS M992
- E. Merrill, EM-453, HQ
- J. White, ESH-19, MS K498
- S. Yanicak, NMED-AIP, MS J993
- T. Taylor, LAAO, MS A316
- EM/ER File, MS M992
- RPF, MS M707

Cy (w/o enc.):

- T. Baca, EM, MS J591
- T. Glatzmaier, EES-DO/ER, MS M992
- J. Jansen, EM/ER, MS M992
- J. Levings, ERD, AL, MS A906
- J. Mose, LAAO, MS A316
- G. Rael, ERD, AL, MS A906
- J. Rochelle, LC-GL, MS A183
- W. Spurgeon, EM-453, HQ
- J. Vozella, LAAO, MS A316
- N. Weber, Bureau Chief, NMED-AIP, MS J993