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State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Hazardous & Radioactive Materials Bureau  
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MARK E. WEIDLER  
SECRETARY

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DEPUTY SECRETARY

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

November 3, 1997

Mr. Theodore Taylor, Project Manager  
Los Alamos Area Office  
Department of Energy  
528 35<sup>th</sup> Street  
Los Alamos, New Mexico 87544

Dr. Sigfried Hecker, Director  
Los Alamos National Laboratory  
P. O. Box 1663, Mail Stop A100  
Los Alamos, New Mexico 87545.

**RE: Notice of Deficiency (Second)  
Response to Notice of Deficiency  
Technical Area 35 RCRA Facility Investigation Report  
Los Alamos National Laboratory  
NM0890010515**

Dear Mr. Taylor and Dr. Hecker:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department is in receipt of the Response to Notice of Deficiency (referenced by EM/ER:97-120) for the Technical Area 35 RCRA Facility Investigation Report (LAUR-96-1293) for dated April 18, 1997 and referenced by EM/ER:96-356. HRMB has found additional deficiencies which require resolution prior to approval of this document. HRMB believes this document to be readily approvable if the information requested within the Attachment is provided. HRMB also believes this information is not a difficult response issue.

LANL must respond to the deficiencies noted in the attachment within thirty (30) days of the receipt of this letter. If LANL does not submit a complete response to the Notice of Deficiency within thirty (30) calendar days, HRMB will deny this document.



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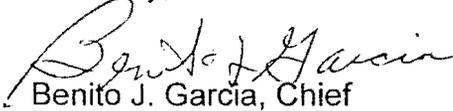
4/1129/35  
ASWA LANL

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Mr. Taylor and Dr. Hecker  
November 3, 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,



Benito J. Garcia, Chief  
Hazardous and Radioactive Materials Bureau

BJG:kth

attachment

cc w/ attachment:

- R. Dinwiddie, NMED HRMB
- T. Glatzmaier, LANL DDEES/ER, MS M992
- K. Hill, NMED HRMB
- 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
- G. Saums, NMED SWQB
- S. Yanicak, NMED DOE OB, MS J993
- File: Reading and HSWA LANL 4/1129/35
- Track: LANL, doc date, NA, DOE/LANL, HRMB/Garcia, RE, file

**ATTACHMENT**  
**Notice of Deficiency**  
**Response to Notice of Deficiency**  
**Technical Area 35 RCRA Facility Investigation Report**  
**April 18, 1997**

The following potential release sites (PRSs) were presented in this document: 35-003(j, k), 35-004(b), 35-008, 35-009(a, b, c, d), 35-014(a, b, d, e1, e2, f), 35-015(b) and 35-016(e, f, g, h, i).

**General Comments:**

1. LANL should submit a Class III "Request for Permit Modification" proposing that the following PRSs be removed from the HSWA Module of the RCRA Operating Permit: 35-003(h), 35-009(a, b, c) and 35-004(b).
2. LANL failed to include within this RCRA Facility Investigation (RFI) Report the investigatory information obtained during the performance of this RFI. LANL shall provide this information under separate cover to HRMB within 30 days of this letter: 35-003(d, e, f, g, l, m, o, q, r), 35-008, 35-014(e1, f) and 35-016(g, h).
3. HRMB has determined that PRSs 35-016(e and f) do not need to be added to the HSWA Module based on the data gathered during site characterization activities.

**Specific Comments:**

1. 35-003(j and k): LANL must provide a schedule for the submission of a sampling and analysis plan for these PRSs.
2. 35-009(d): LANL must submit the analytical results for the water sampled from this PRS within the Voluntary Corrective Action Completion Report.
3. 35-014(e2) and 35-016(i): Since concentrations of contaminants (zinc, manganese, nickel, lead and titanium) were identified above upper tolerance limits and the potential for subsurface percolation exists, LANL must conduct additional depth sampling at location 35-2156. LANL must obtain samples at depth in one-foot intervals to delineate the vertical extent of contamination.