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U. S. Department of Energy
 Los Alamos Area Office, MS A316
 Environmental Restoration Program
 Los Alamos, New Mexico 87544
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*File
 please file
 NOD to program
 12/11/97*

*HSWA LANL 4/1129/35
 TA-35*

Date: December 5, 1997
 Refer to: EM/ER:97-515

*duplicate
 John,
 please copy*

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

**SUBJECT: RESPONSE TO THE NOD FOR THE RFI REPORT FOR PRS(s)
 IN TA-35 (FORMER OU 1129)**

Dear Mr. Garcia:

Enclosed is a copy of the Los Alamos National Laboratory's response to the New Mexico Environment Department's Notice of Deficiency (NOD) concerning the Resource Conservation and Recovery Act Facility Investigation Report for potential release sites in Technical Area 35. A certification form signed by the appropriate officials is also enclosed. The enclosed response repeats each comment from the NOD verbatim for convenience in reviewing.

Please contact Allyn Pratt at (505) 667-4308 or Mike Gilgosh at (505) 667-5794, if you have any questions regarding the response.

Sincerely,

Julie A. Canepa

Julie A. Canepa, Program Manager
 LANL/ER Project

Sincerely,

Theodore J. Taylor

Theodore J. Taylor, Program Manager
 DOE/LAEO

IJ/TT/kr

- Enclosures: (1) Response to the NOD for RFI Report for PRSs in TA-35 (Former OU 1129)
 (2) Certification

4 / 1129 / 35
 LANL



12

Cy (w/enc.):

M. Gilgosh, LAAO, MS A316
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J. Harry, EES-5, MS M992
D. Neleigh, EPA, R.6, 6PD-N
A. Pratt, EES-13, MS J521
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J. White, ESH-19, MS K490
S. Dinwiddie, NMED-HRMB
M. Leavitt, NMED-GWQB
J. Parker, NMED-HRMB
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D. McInroy, EM/ER, MS M992
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S. Rae, ESH-18, MS K497
G. Rael, AL-ERD, MS A906
J. Vozella, LAAO, MS A316
EM/ER File (CT# C393), MS M992
EM/ER File, MS M992

Response to Notice of Deficiency (Second)
Response to Notice of Deficiency
Technical Area 35 RCRA Facility Investigation Report

INTRODUCTION

To facilitate review of this response, the New Mexico Environmental Department's (NMED's) comments are included verbatim. The comments are divided into general and specific categories as presented in the letter. Los Alamos National Laboratory's (LANL's) responses follow each NMED comment. The following potential release sites (PRSs) were presented in the May 1996 Resource Conservation and Recovery Act facility investigation (RFI) report: 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). The following PRSs were also investigated: 35-003(d, e, f, g, l, m, o, q, r); 35-008; 35-014(e, f); and 35-016(g, h); however, further characterization was needed. Therefore, those PRSs were not presented in the May 1996 RFI report (see NMED general comment number 2).

GENERAL COMMENTS

NMED Comment

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).*

LANL Response

1. LANL will request a Class III permit modification for the listed PRSs.

NMED Comment

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).*

LANL Response

2. An RFI report that included PRS Nos. 35-003(d, e, f, g, l, m, o, q, r) and 35-016(g, h) was prepared in June 1996. That report contained the results and the status of the investigations performed up to that time (Phase I). The report also contained sampling and analysis plans (SAPs) for the PRSs, which are necessary to determine the nature and extent of contamination found during the Phase I activities. In April 1997 the additional site characterization activities were started; they are scheduled to be completed in the spring of 1998. The June 1996 RFI report was originally withheld in anticipation of combining the Phase I data with the data obtained during execution of the SAP, which would provide a

complete report to NMED. LANL plans to submit an RFI report for those PRSs that can be proposed for no further action (NFA) by September 30, 1998. The June 1996 RFI report is being submitted to NMED under separate cover in accordance with NMED's request.

A SAP that included PRS Nos. 35-008 and 35-014(e₁) was submitted to the Los Alamos Area Office of the Department of Energy (DOE/LAAO) in April 1997. That SAP contained a summary of the results obtained up to that time (Phase I). Additional sampling at these PRSs is necessary to determine the extent of contamination found during the Phase I activities. An RFI report for those PRSs that can be proposed for NFA is scheduled to be delivered by September 30, 1998. The April 1997 SAP is being submitted to NMED under separate cover in accordance with NMED's request.

PRS No. 35-014(f) was the subject of a voluntary corrective action (VCA). The VCA completion report was submitted to DOE/LAAO in September 1996. The VCA completion report is being submitted to NMED under separate cover in accordance with NMED's request.

NMED Comment

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.*

LANL Response

3. PRS Nos. 35-016(e and f) will not be added to the HSWA Module, and no further investigation for human health assessment will be conducted.

SPECIFIC COMMENTS

NMED Comment

1. *35-003(j and k): LANL must provide a schedule for the submission of a sampling and analysis plan for these PRSs.*

LANL Response

1. In June 1997 LANL submitted to DOE/LAAO a SAP for additional sampling at PRS Nos. 35-003(j and k). The SAP is included as Attachment I of this notice of deficiency (NOD) response.

NMED Comment

2. *35-009(d): LANL must submit the analytical results for the water sampled from this PRS within the Voluntary Corrective Action Completion Report.*

LANL Response

2. LANL submitted the VCA completion report (LA-UR-96-2449) to DOE/LAAO and NMED in July 1996. However, because the analytical results of the water sampled from the septic tank were not included in the report, they are included as Attachment II of this NOD response.

NMED Comment

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.*

LANL Response

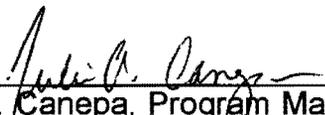
3. A sampling and analysis plan will be written for these PRSs, and LANL will collect additional samples in one-foot intervals at Location ID No. 35-2156 to delineate the vertical extent of contamination. The samples will be analyzed for metals on the LANL Environmental Restoration Project target analyte list using Environmental Protection Agency SW-846 methods.

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CERTIFICATION

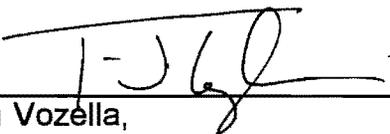
I certify under penalty of law that these documents and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violation.

Document Title: Response to the NOD for RFI Report for PRSs in TA-35 (Former OU 1129)

Name:  Date: 12/5/97
Julie A. Canepa, Program Manager
Environmental Restoration Project
Los Alamos National Laboratory

or

Tom Baca, Program Director
Environmental Management
Los Alamos National Laboratory

Name:  Date: 12/5/97
Joseph Vozella,
Acting Assistant Area Manager of
Environmental Projects
Environment, Safety, and Health Branch
DOE-Los Alamos Area Office

or

Theodore J. Taylor, Program Manager
Environmental Restoration Program
DOE-Los Alamos Area Office

Attachment I

Table ES-1
Summary of Proposed Actions

TABLE ES-1

SUMMARY OF PROPOSED ACTIONS

PRS	HSWA	NFA Criteria	Further Action	Proposed Action	
				Rationale	Section No.
35-003(h)	X	4		Contamination below SALs, no COPCs identified	5.3
35-003(j) 35-003(k) 35-014(d) 35-015(b)	X X X	4		COPCs were determined to pose a negligible threat to human health	5.4
35-004(b)	X	4		Contamination below SALs, no COPCs identified in human health screening assessment	5.6
35-016(e)		4		Contamination below SALs, no COPCs identified in human health screening assessment	5.7
35-009(a)	X	4		Contamination below SALs, no COPCs identified in human health screening assessment	5.8
35-009(b)	X	4		Contamination below SALs, no COPCs identified in human health screening assessment	5.9
35-009(c)	X	4		COPCs were determined to pose a negligible threat to human health	5.10
35-009(d)	X	4		Contamination below SALs, no COPCs identified in human health screening assessment	5.11
35-014(a)	X	1		Site has not received solid or hazardous wastes as defined in the HSWA module	5.12
35-014(b)	X	4		Contamination below SALs, no COPCs identified	5.13
35-014(e ₂) 35-016(i)	X X	3 and 4		Contamination below SALs, no COPCs identified in human health screening assessment	5.14
35-014(f)			VCA	Contamination obvious, small area, remedy obvious	5.15
35-016(f)		4		Contamination below SALs, no COPCs identified in human health screening assessment	5.16
35-008 35-014(e ₁)	X X		VCA	Contamination above SALs, surface water issues, remedy obvious	5.19

Attachment II

Photographs

Photographs of PRS Nos. 35-003(j and k), 35-014(d), and 35-015(b), a former waste-oil treatment facility.

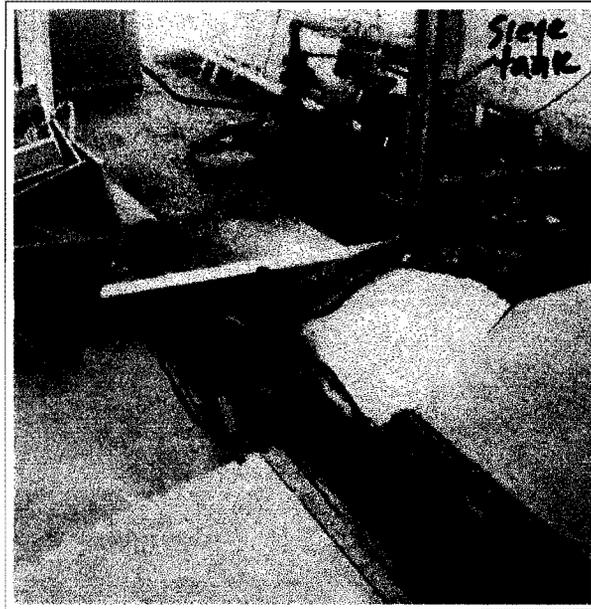


Figure 2-1. Photograph #57 photographed on 4/27/88. Oil-stained area around the oil tank near Location ID No. 35-2087 southwest of TA-35-29. The oil siege tank was removed in 1989 or 1990.



Figure 2-2. Photograph #59 photographed on 4/27/88. Oil-stained soil around the oil siege tank north of Location ID No. 35-2087 northwest of TA-35-29. The oil siege tank and metal shed were removed in 1989 or 1990.

Photographs of PRS Nos. 35-003(j and k), 35-014(d), and 35-015(b), a former waste-oil treatment facility.

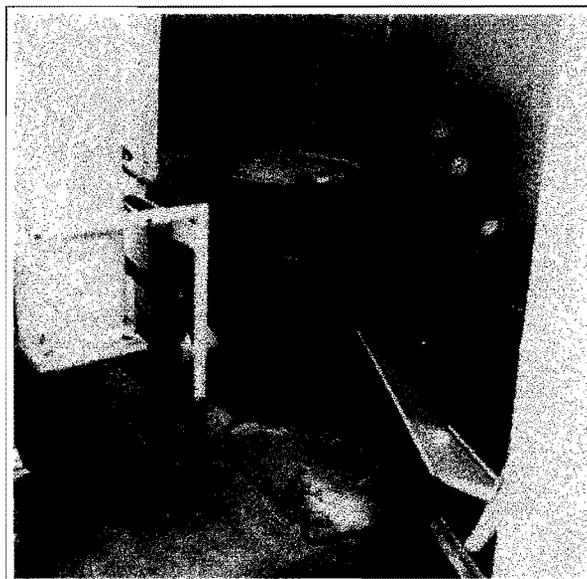


Figure 2-3. Photograph #58 photographed on 4/27/88. Oil-stained area around 55-gal. drum near Location ID No. 35-2087 west of TA-35-29. The 55-gal. drum was removed in 1989 or 1990.

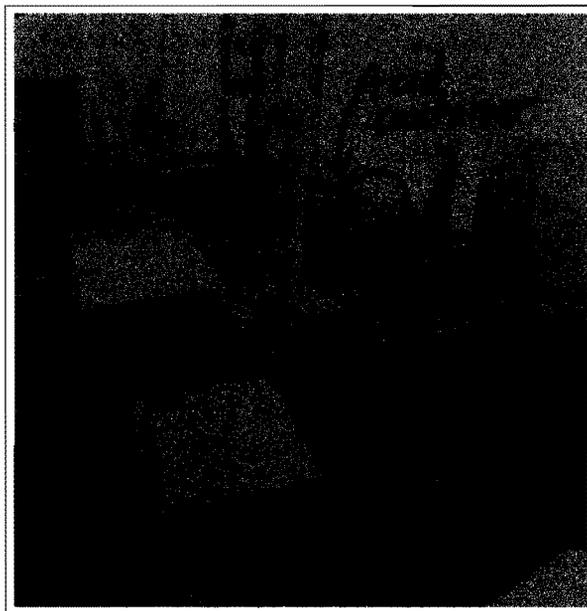


Figure 2-4. Photograph #60 photographed on 4/27/88. An acid container and a full, uncovered paint can on the floor north of Location ID No. 35-2087 east of TA-35-29. Both containers were removed in 1989 or 1990.

Attachment III

Sample Location Map

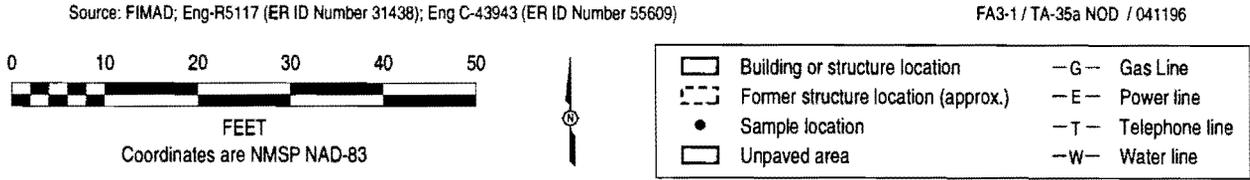
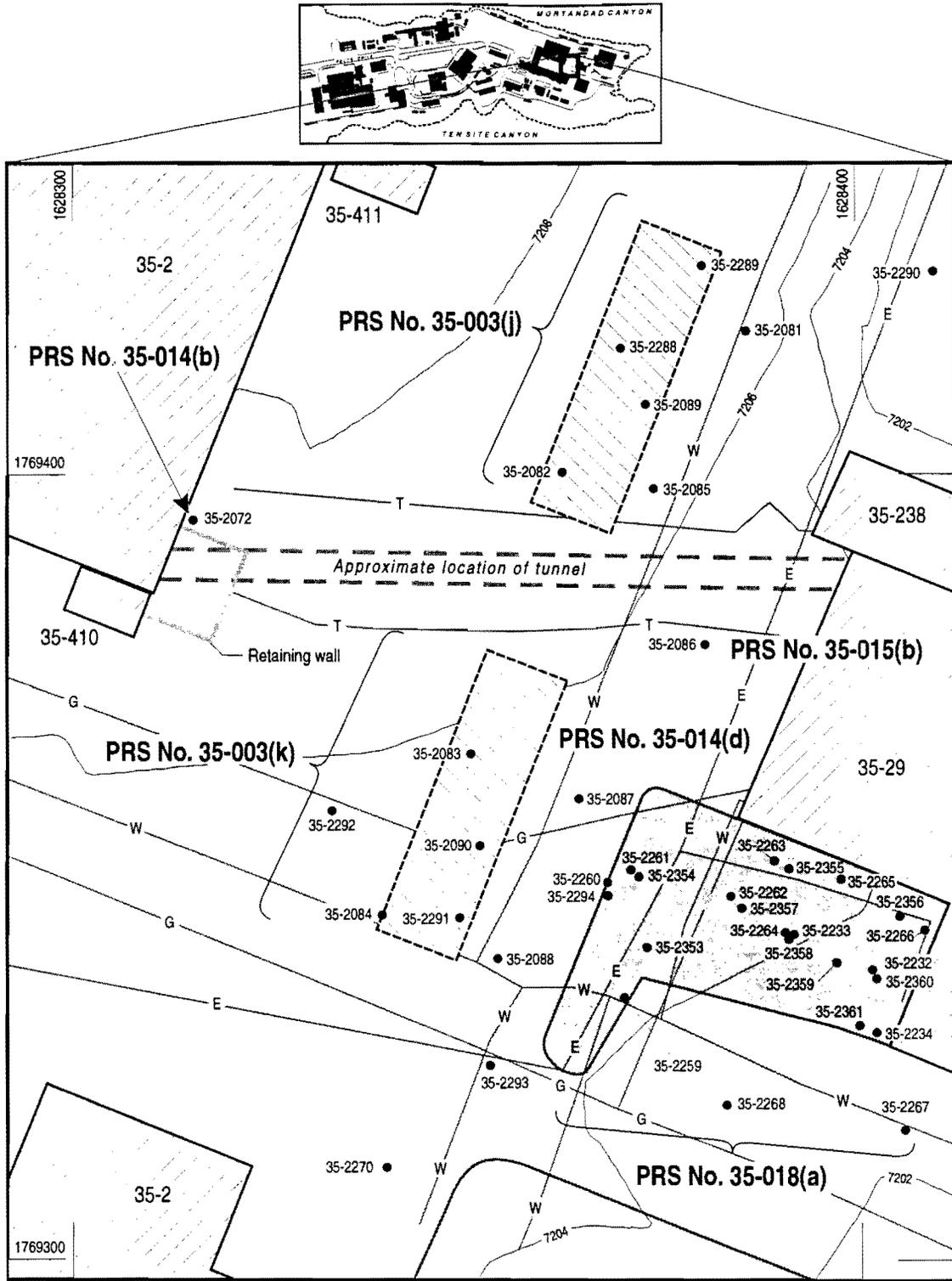


Figure A3-1. Locations of samples near PRS No. 35-014(b).