



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
DOE OVERSIGHT BUREAU
P.O. Box 1663, MS/J-993
Los Alamos, New Mexico 87545

MARK E. WEIDLER
SECRETARY

TA-36

LANL/ER/00 1130

March 7, 1997

Mat Johansen, DOE AIP POC
U. S. Department of Energy
Los Alamos Area Office, MS A316
Los Alamos, NM 87544

RE: Review of "RFI Report for Potential Release Sites at TA-36, 36-001, 36-004(d) (Skunk Works and Burn Pits), and 36-006", Los Alamos National Laboratory, June, 1996, LA-UR-96-2139.

Dear Mr. Johansen:

The DOE Oversight Bureau (DOE OB) has reviewed the subject document. The following comments are provided for the purpose of communicating the results of the review. They are not provided or intended for the purpose of representing the regulatory position of the New Mexico Environment Department (NMED).

General comments:

1. This report does not include an assessment of ecological risk. Risk to ecological receptors should be evaluated before sites are proposed for No Further Action.
2. The RFI Report should be a stand-alone document containing a tabulation of analytical results. Results should replace analysis request numbers that are supplied in the summary tables of this report.

Specific comments:

1. Page 5-8, Table 5.1.4.5-2 Sample summary for MDA-AA, 1995-1996 season
See general comment 2.



2. **Page 5-14, Paragraph 2; "The future site use is assumed to be continued Laboratory operations and, therefore, no other exposure scenarios were evaluated." and Page 5-19, § Risk Characterization, Paragraph 1 "The site-specific PRGs were calculated based on an intrusive industrial scenario ...".** A residential land use should be calculated in addition to the preferred land use scenario (intrusive industrial) so that the regulatory agency can compare the risk based on both scenarios. → Section?
3. **Page 5-31, § 5.3.4.4, Paragraph 4; "The berm was also hand augered to determine if it contained burned material, but only construction fill material was present."** What was the number of auger holes placed in the berm and where were they located? What materials were visible in the construction fill material? Visual inspection of the berm may not be enough to confirm that it does not contain hazardous constituents. Soil samples may need to be taken from the berm and analyzed for the same list of COPCs as the pit bottom. 3 Holes
No Ash or
Burned wood
4. **Page 5-34, Table 5.3.4.4-4 Sample summary for burn pits**
See general comment 2.
5. **Page 5-35, §§ 5.3.5, 5.3.6, 5.3.7, and 5.3.7.1**
In addition to these sections, analytical data and comparisons to background UTLs and SALs should be provided in a tabular form.
6. **Page 5-38, Figure 5.4.4.2-1, PRS 36-006, Showing XRF screening locations**
This map should include the location of the Eenie firing pad for reference.
7. **Page 5-39, § 5.4.4.5, Paragraph 1; "The debris itself was screened but not sampled."**
What were the results of the radiological screening assessment of the debris? Are the cables contaminated?
→ There might be a concern about the water course at this location
8. **Page 5-40, Figure 5.4.4.2-1 PRS 36-006, showing sample locations and results;**

Has the canyon been field checked for additional debris in the canyon watercourse below the designated PRS?

9. **Page 5-43, § 5.4.7.2; "This PRG was calculated based on a nonintrusive industrial (surface soil) scenario using standard EPA default parameters."**

A residential land use should be calculated in addition to the preferred land use scenario (nonintrusive industrial) so that the regulatory agency can compare the hazard ratios of both scenarios.

If there are any questions concerning this review, please contact me at 505-672-0448 or Martyne Kieling of our staff at 505-827-1536.

Sincerely,

*write A Synopsis of what was seen
in the field
& How it differs
from the :*

Steve Yanicak, LANL POC
Department of Energy Oversight Bureau

SY:MK:mk

cc w/attachment:

John Parker, NMED, Chief, DOE OB
Benito Garcia, NMED, Chief, HRMB
Marcy Leavitt, NMED, Chief, GWQB
Glenn Saums, NMED, Program Manager, SWQB
Ted Taylor, DOE LAAO, Program Manager, MS A316
Everett Trollinger, DOE LAAO, FU-2 FPC, MS A316
Gene Gould, LANL, FU-2 FPL, MS D462
File