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**ENVIRONMENT DEPARTMENT**  
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**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

July 21, 1997

Mr. G. Thomas Todd, Area Manager  
Los Alamos Area Office  
Department of Energy  
528 35th Street  
Los Alamos, New Mexico 87544

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

**RE: Request for Supplemental Information and Additional Work  
Technical Area 36  
Los Alamos National Laboratory  
NM0890010515**

Dear Mr. Todd and Dr. Hecker:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department has reviewed the Response to Notice of Deficiency for Technical Area 36 dated February 27, 1996 and referenced by EM/ER:96-081 and found it to be insufficient. LANL must respond to the supplemental information request noted in Attachment A within 30 days of the receipt of this letter and include a schedule for performing the requested additional work.



2332

HSWA LANL 2/1130/36

16

Mr. Todd and Dr. Hecker  
July 21, 1997  
Page 2

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,



Robert S. (Stu) Dinwiddie, Manager  
RCRA Permits Management Program  
Hazardous and Radioactive Materials Bureau

RSD:kth

attachment

cc w/ attachments: T. Baca, LANL EM-DO, MS J591  
T. Davis, NMED HRMB  
B. Garcia, NMED HRMB  
T. Glatzmaier, LANL DDEES/ER, MS M992  
K. Hill, NMED HRMB  
J. Jansen, LANL EM/ER, MS M992  
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  
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J. Parker, NMED DOE OB  
S. Pierce, NMED SWQB  
L. Roberts, EPA 6EN-AT  
G. Saums, NMED SWQB  
T. Taylor, DOE LAAO, MS A316  
S. Yanicak, NMED DOE OB, MS J993  
File: Reading and HSWA LANL 2/1130/36  
Track: LANL, doc date, NA, DOE/LANL, HRMB/kth, RE, file

**ATTACHMENT A**  
**Request for Supplemental Information and Additional Work**  
**Notice of Deficiency Response**  
**Technical Area 36**  
**February 27, 1996**

The following potential release sites were presented in this document: 36-003(a-b), 36-005 and C-36-003.

**GENERAL COMMENT**

LANL shall ensure that seals have been emplaced such that flow into and out of all inactive septic tank PRSs has been eliminated. Each inactive septic tank should be removed or, at a minimum, be backfilled with a solid, non-porous material (such as flow crete). However, any action other than removal of the tank and associated lines may not be considered in the future as a final disposition of the PRS.

**SPECIFIC COMMENTS**

1. **36-003(a):** LANL must indicate if the Expedited Cleanup (EC) Plan dated June 1996 has been implemented, and if so, LANL must submit the EC Completion Report.
2. **36-003(b):**
  - a. The Administrative Authority recommends that LANL perform an Interim Action to remove contaminated liquid and sludge from the interior of this PRS.
  - b. Sample locations indicated on Figure 1-8 appear to be inappropriately located (i.e., approximately 50 feet west of the outfall drainage area). LANL must resample immediately below the outfall.
  - c. LANL must indicate the distance from this PRS to the wetland indicated in Section 4.2.3.4, page 4-11.
  - d. As part of its response to this request for supplemental information, LANL shall provide any analytical results pertaining to the drainageway extending from the PRS outfall to the wetland.
3. **36-005:** LANL must perform additional characterization activities (Phase II) based on Phase I sampling results. The Phase II Sampling and Analysis Plan (SAP) presented in the RFI Report is inadequate. A few of the deficiencies noted are as follows: inadequate sampling depths, inappropriate (onsite) analytical laboratory proposed, exclusion of a Phase II sampling location map, etc. **LANL must revise and resubmit the Phase II SAP for this potential release site (PRS).**

4. **C-36-003:**

- a. LANL must retain the polyaromatic hydrocarbons (PAHs) which failed the screening assessment as contaminants of potential concern. Elevated concentrations of PAHs identified in sample AAB1913 exceed concentrations anticipated from asphalted areas such as parking lots or roofing materials and are indicative of contaminants directly related to Laboratory processes.
- b. The Phase II SAP presented in the RFI Report is inadequate. A few of the deficiencies noted are as follows: inadequate sampling depths, inappropriate use of PCB field screening kit, lack of proper analyses (metals, volatile organic compounds and polychlorinated biphenyls), etc. **LANL must revise and resubmit the Phase II SAP for this PRS.**
- c. LANL shall ensure that all Phase II sampling locations are clearly identified and enumerated on the sample location map included in the Phase II SAP.