State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544

GARY E. JOHNSON
GOVERNOR

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ENTERED

July 29, 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
RCRA Facility Investigation Report
Technical Area 39
Los Alamos National Laboratory (LANL)
NM0890010515

Dear Mr. Todd and Dr. Hecker:

The Resource Conservation and Recovery Act Permits Management Program (RPMP) of the Hazardous and Radioactive Materials Bureau (HRMB) has reviewed the RCRA Facility Investigation Report for Technical Area 39 dated April 1995, referenced by EM/ER:95-125, has been reviewed and found it to be insufficient. The NMED Department of Energy (DOE) Oversight Bureau and the US Environmental Protection Agency (EPA) provided technical comments which were considered in staff review. LANL must respond to the request for supplemental information noted in Attachment A within thirty (30) calendar days of the receipt of this letter. If DOE/LANL does not submit a complete response to the request for supplemental information or submit the information within thirty (30) calendar days a Notice of Deficiency will then be issued.

2420

TL

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, Ph.D., 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
D. Neleigh, EPA, 6PD-N
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: HSWA LANL 2/1132/39
Track: LANL, doc date, NA, DOE/LANL, HRMB/kth, RE, file

A:\TA39NOD.LTR 7/29/97

ATTACHMENT A

Request for Supplemental Information
RCRA Facility Investigation Report
Technical Area 39
April 1995

The following potential release sites were presented in this document: 39-002(a-f), 39-005, 39-006(a) and 39-007(a, d).

GENERAL COMMENTS

1. Ecological risk assessments for all sites will need to be reevaluated when an eco-zone approach has been agreed to by the Administrative Authority.

2. The polychlorinated biphenyl (PCB) guidance on page 7-3 is inaccurate and does not represent the Environmental Protection Agency's position on the cleanup of PCBs. Depending on site-specific considerations, the Regional Administrator may determine that a different cleanup level is more protective than those discussed. Environmental Protection Agency (EPA) Region 6 has a policy requiring cleanup of PCBs in any drainage areas or areas leading to surface water of 1 part per million in soil. Official notification of PCB cleanups should be made to the Toxic Substance Control Act (TSCA) personnel. [See EPA Comments on Draft LANL Guidance, Cleanup of Polychlorinated Biphenyls dated May 8, 1995, and EPA letter dated September 20, 1995, PCB Spill Cleanup Policy.]

3. LANL needs to provide a schedule for work plan submittal, fieldwork and projected RCRA Facility Investigation (RFI) Report dates for sites which will require additional characterization.

SPECIFIC COMMENTS

1. **39-002(a) Satellite Storage Area:** LANL recommends an expedited cleanup for this site. Additional sampling is needed to characterize the extent of contamination prior to finalization of a cleanup plan.

2. **39-002(b) Satellite Storage Area:** Administrative Authority (AA) does not concur with postponing the investigation of 39-004(c) until decommissioning or with combining 39-002(b) with 39-004(c). PCBs were found in two samples at levels well in excess of 1 ppm in a drainageway. LANL shall characterize this area for PCBs and other contaminants of potential concern, install best management practices to prevent runon/runoff, and remove contaminated material (including PCBs in excess of 1 ppm) from the **drainage area or areas leading to surface water**.

3. **39-002(c) Storage Area:** Additional characterization and removal of the contaminant source is appropriate for this site. LANL must perform source removal and reevaluate the multiple constituent evaluation for all polyaromatic hydrocarbons above screening action levels (SALs).

4. **39-002(d) Storage Area:** LANL must specifically respond to each of the questions posed in the Notice of Deficiency (NOD) Comment 19. It is not acceptable to respond to an NOD comment with "see the work plan."

   Beryllium and uranium were found above SALs at this potential release site (PRS). Therefore, additional characterization appears appropriate. A determination to combine this PRS with 39-004(d) will be based, in part, on information supplied in response to the NOD comments.

5. **39-002(e) Storage Area:** LANL must respond to NOD Comment 21: *If the paved area between the storage area and the unpaved area was not paved at one time, contaminants may have accumulated in the area that is now covered with asphalt. Provide additional justification for the selection of sampling locations.*

   Also, provide additional information concerning the physical characteristics of, and the waste handling practices at, PRS 39-002(e). Information concerning physical characteristics should include historical drainage pathways, previous structures, and the addition or removal of paved parking or storage areas. Waste information should include waste types, rates of waste generation, the ultimate fate of waste materials, and references to, or records of, these activities. If no records are available, LANL should so state.

   LANL must provide rationale for selection of sampling locations. LANL must perform additional sampling.

6. **39-002(f) Storage Area:**
   a. Elevated levels of copper (3,200 mg/kg) exceed the screening action level (200 mg/kg). Therefore, LANL must perform further characterization to define the nature and extent of contamination. The presence of high levels of copper may be especially significant in an ecological risk assessment.
   b. In addition, LANL must respond to this NOD by providing the PCB analytical results for this PRS.

7. **39-007(a) Storage Area:** The AA will review the proposed voluntary corrective action plan and report.

8. **39-007(d) Storage Area:** This PRS is appropriate for recommendation for no further action (NFA) under Document of Understanding NFA Criteria 5.

9. **39-006(a) Septic Tank System, Sand Filters and Outfall:**
   a. LANL must perform additional sampling in the active septic tank as agreed to in the NOD Response.
   b. PCBs concentrations (4.4 ppm) were found at a depth of 6 feet in the inactive septic tank. This indicates that contamination may be more extensive that originally suspected. LANL must drill deeper boreholes in both of the sand filters and collect and analyze samples every 3 feet beginning at the 6-foot interval and continuing through the 15-foot interval. Samples should be analyzed for metals, PCBs, and TCLP.
   c. In the RFI, LANL proposes removing the chemical seepage pit. The AA agrees with this proposal; however, LANL must conduct appropriate confirmatory sampling.

10. **39-005 High Explosives Seepage Pit:** LANL must obtain borehole samples from the bottom center of the seepage pit at depths of 3, 6, 9 and 12 feet below the fill material.