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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 22, 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 and Notice of Deficiency Response
Technical Area 42
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 Notice of Deficiency Response for Technical Area 42 dated July 19, 1996 and referenced by EM/ER:96-401 and found it to be insufficient. LANL must respond to the deficiencies noted in Attachment A within 30 days of the receipt of this letter.



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4/1/29/42

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Mr. Todd and Dr. Hecker
July 22, 1997
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Should you have any questions regarding this letter, please contact me or Mr. John Kieling, RPMP'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
R. Dinwiddie, 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: Reading and HSWA LANL 4/1129/42
Track: LANL, doc date, NA, DOE/LANL, HRMB/kth, RE, file

ATTACHMENT A
Request for Supplemental Information
RCRA Facility Investigation and Notice of Deficiency Response
Technical Area 42
July 19, 1996

The following potential release sites were presented in this document: 42-001(a-c), 42-002(a-b) and 42-003

COMMENTS

1. LANL shall not use TCLP analyses for the characterization and investigation of PRSs. LANL must conduct confirmatory sampling using appropriate EPA-approved analytical methods for totals analyses.
2. LANL must not limit their sampling suite based on Toxicity Characteristic Leachate Procedure (TCLP) analytical results. Analytical suites may be limited where appropriate using EPA-approved analytical methods for total analyses. LANL must resample all locations previously sampled and analyzed using TCLP analyses.
3. All PRSs, regardless of the type of on-going activity (such as decommissioning), must be investigated and remediated per RCRA regulations and guidelines (including TCLP analyses of waste for disposal purposes and totals analyses for determining nature and extent of contamination). All decontaminating and decommissioning of PRSs must include confirmatory sampling of environmental media for hazardous waste and hazardous constituents. LANL must conduct confirmatory sampling of environmental media using appropriate EPA-approved analytical methods for totals analyses.
4. The polychlorinated biphenyl (PCB) action levels presented in Section 4.1.1.2, paragraph 2 does not represent the Environmental Protection Agency's position on PCB action levels. Depending on site-specific considerations, the Regional Administrator may determine that a different action/cleanup level is more protective than those presented. Official notification of identified PCBs 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.]
5. Section 4.1.2, paragraph 2: LANL must clarify if the entire soil/fill material column collected from the ground surface to the soil/tuff interface was homogenized and sampled or if a sample was collected from the soil/tuff interface and homogenized prior to shipment to the laboratory.

6. Response to NOD Comment 5(b) and Section 4.1.1.2, paragraph 2: LANL does not provide the analytical results for polyaromatic hydrocarbons (PAHs). Thereby, making it impossible to determine if the PAHs should be eliminated or retained as contaminants of potential concern. LANL must submit the analytical data for all samples obtained during this RFI (see comment below).
7. LANL shall provide a summary of all analytical data including non-detectable concentrations and detection limits.
8. LANL shall provide the following pertinent information in an addendum to the RFI Report: a tabulated summary of field screening techniques, field screening instrumentation readings, field screening calibration records and field screening instrument detection limits.