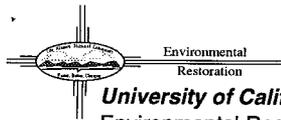


TA-48

Steve  
Teri D ✓  
In this  
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KH IS



**University of California**  
Environmental Restoration Project, MS M992  
Los Alamos, New Mexico 87545  
505-667-0808/FAX 505-665-4747



**U. S. Department of Energy**  
Los Alamos Area Office, MS A316  
Environmental Restoration Program  
Los Alamos, New Mexico 87544  
505-667-7203/FAX 505-665-4504



Date: October 17, 1996  
Reference: EM/ER:96-533

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

**SUBJECT: RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FOR TA-48 RFI REPORT**

Dear Mr. Garcia:

Enclosed are two copies of the Los Alamos National Laboratory's response to the New Mexico Environment Department's (NMED's) request for additional information for Technical Area (TA) 48, Resource Conservation and Recovery Act Facility Investigation Report, Solid Waste Management Units 48-001, 48-002(e), 48-003, 48-005, 48-007(a, b, c, d, and f), and 48-010. A certification form signed by the appropriate officials is also enclosed.

In the original response to the Notice of Deficiency for TA-48, we said that we would send a sampling and analysis plan to NMED by October 30, 1996. However, in light of recent agreements with NMED, we will have internal review only prior to implementing the activities. NMED will be informed of the activities as the work progresses via the monthly reports.

Please contact Allyn Pratt at (505) 667-4308 or Bob Simeone at (505) 667-0587 if you have any questions regarding the response.

Sincerely,  
  
Jorg Jansen, Program Manager  
LANL/ER Project

Sincerely,  
  
Theodore J. Taylor, Program Manager  
DOE/LAEO

JJ/TT/bp

- Enclosures: (1) Response to Request for Additional Information for TA-48 RFI Report  
(2) Certification



Cy (w/ encs.):

T. Glatzmaier, DDEES/ER, MS M992  
D. Griswold, AL-ERD, MS A906  
J. Harry, EES-5, MS M992  
B. Hoditschek, NMED-HRMB  
M. Leavitt, NMED-GWQB  
N. Naraine, DOE-HQ, EM-453  
D. Neleigh, EPA, R.6, 6PD-N (2 copies)  
J. Piatt, NMED-SWQB  
A. Pratt, EES-13, MS J521  
C. Rodriguez, CIO, MS A117  
B. Simeone, LAAO, MS A316  
T. Taylor, LAAO, MS A316  
N. Weber, NMED-AIP, MS J993  
J. White, ESH-19, MS K498  
S. Yanicak, NMED-AIP, MS J993  
EM/ER File (CT #139), MS M992  
RPF, MS M707

Cy (w/o encs.):

T. Baca, EM, MS J591  
D. McInroy, EM/ER, MS M992  
J. Levings, AL-ERD, MS A906  
W. Spurgeon, DOE-HQ, EM-453  
J. Vozella, LAAO, MS A316  
K. Zamora, LAAO, MS A316

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FOR  
TECHNICAL AREA 48 RESOURCE CONSERVATION AND RECOVERY ACT  
FACILITY INVESTIGATION REPORT**

**No. 1**

*Ecological Risk Assessments will need to be conducted for these SWMUs following the approach which has been agreed to by the NMED and the EPA.*

Further ecological risk assessment at this site will be conducted following the ecological risk assessment methodology currently being implemented by Los Alamos National Laboratory (LANL). A sampling and analysis plan (SAP) for Technical Area 48 is being prepared as committed in the May 1996 response to the original notice of deficiency (NOD). Although the ecological risk assessment methodology will not have been fully implemented when the SAP is written, LANL ecologists will participate in designing the SAP to ensure that data required to address ecological concerns are collected.

**No. 2**

*SWMU 48-005: LANL shall conduct sampling for waste line 36 which was not done in conjunction with the other lines. LANL should include this area with the other sampling plans to be submitted in October 30, 1996, or LANL shall provide a schedule for submittal of this work plan within thirty days of receipt of this letter.*

Field Unit 4 will include sampling of waste line 36 with the SAP for other abandoned waste lines in SWMU 48-005 (waste lines 34, 37, and 38). A release of contaminated water from waste line 36 is known to have occurred in 1982 at the northwest corner of building TA-48-1 (Emelity 1982, 797). Investigation of residual soil contamination in the area of the reported release will be addressed in the forthcoming SAP.

**No. 3**

*In the NOD Response No. 30, LANL indicates that these sites are regulated under the NPDES program. While the discharge from these outfalls may fall under NPDES program, this program does not address corrective action or require cleanups of problem areas. Therefore, these sites do not meet the requirements for no further action. Analysis should be conducted for organics and inorganics in future sampling as analysis for these constituents was extremely limited during Phase I sampling.*

The Environmental Restoration (ER) Project does not consider an outfall to be a potential release site if the outfall is subject to regulation under Section 402 of the Clean Water Act as a point source discharge because the wastewater discharge is not a solid waste (40 CFR 261.4[a][2]). Also, the Clean Water Act and the Resource Conservation and Recovery Act cannot have duplicative authority over the same material. However, the ER Project does consider outfalls to be potential release sites if they were active before the Clean Water Act was passed because at that time no regulations existed to govern wastewater discharges to the environment.

Because the outfall at SWMU 48-007(d) was active before the Clean Water Act was passed, a SAP for SWMUs 48-007(a and d) and 48-010 is being prepared to address historical contamination (as committed in the May 1996 response to the original NOD). In accordance with the original NOD response, radionuclide contaminants will be further characterized. In addition, analysis for organics and inorganics will be addressed in the SAP.

## 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 Request For Additional Information For TA-48 RFI Report

Name:  \_\_\_\_\_ Date: 10-17-96  
Jorg Jansen, Program Manager  
Environmental Restoration Project  
Los Alamos National Laboratory

or

Tom Baca, Program Director  
Environmental Management  
Los Alamos National Laboratory

Name:  \_\_\_\_\_ Date: 10/17/96  
Joseph Vozella,  
Acting Assistant Area Manager of  
Environment Projects  
Environment, Safety, and Health Branch  
DOE-Los Alamos Area Office

or

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

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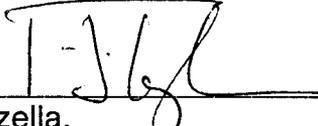
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