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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

August 19, 1996

Mr. G. Thomas Todd
DOE/LAAO
538 35th Street
Los Alamos, New Mexico 87544

Dear Mr. Todd:

**RE: Notice of Deficiency
RCRA Facility Investigation Report- Technical Area 50
Los Alamos National Laboratory (NM0890010515)**

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has received the United States Environmental Protection Agency's (EPA) review of the Department of Energy/Los Alamos National Laboratory's (DOE/LANL) RFI Report for Technical Area 50 (dated March 1, 1996) and agrees that it is deficient. NMED HRMB requires that DOE/LANL respond within ninety (90) days to the specific deficiencies in Attachment A.

Should you or your staff have any questions concerning this Notice of Deficiency, please contact myself or Robert S. (Stu) Dinwiddie of my staff at the above address or by telephone at 505/827-1561.

Sincerely,

Stu Dinwiddie

for Barbara Hoditschek, Manager
RCRA Permits Management Program

attachment

cc: J. Vozella, DOE LAAO
T. Taylor, DOE LAAO
J. Jansen, LANL
D. Neleigh, EPA
B. Garcia, NMED HRMB
R. Dinwiddie, NMED HRMB
T. Davis, NMED HRMB
N. Weber, NMED DOE OB
LANL 96 File



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ATTACHMENT A
Notice of Deficiency
RFI Report for Technical Area 50
Los Alamos National Laboratory

This report included information on the following sites: 50-004(a,c) and 50-011(a). Unless otherwise noted, all comments are considered best professional judgement.

LANL may request a Class 3 permit modification for SWMU 50-011(a) under No Further Action Criterion 5 (the potential release site has been characterized or remediated in accordance with current applicable state or federal regulations, and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use).

Specific Comments:

1. **SWMUs 50-004(a,c):** These two abandoned pipelines are known to have leaked during their history of operation, and this fact is reported in several different locations throughout the RFI Report. No other information is provided on the leaks. The report should state, if such information is available:

- (1) where along the pipelines the leaks occurred;
- (2) the length of time the pipelines were leaking;
- (3) the constituents passing through the pipelines at the time of the leaks.

The sampling and analysis program could have been much more thorough if this information had been available and considered. As reported, samples were collected from areas between buildings--as determined by accessibility, rather than by sampling the locations which incurred leaks.

2. **SWMUs 50-004(a,c):** A second issue with the pipeline sampling program is the depth from which the samples were taken. It is reported that samples were taken from the contact between the trench fill and the trench floor, but no deeper. The contact zone may be essentially flushed and contaminants percolated downward through the permeable soil/trench fill. LANL should provide additional sampling at a depth below the trench floor. This should be based on information where leaks may have occurred. A sampling plan should be submitted with the NOD Response to address this issue.