



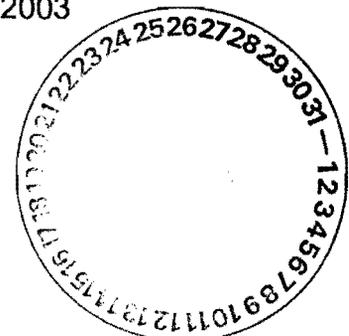
TA-50

Los Alamos National Laboratory/University of California  
Risk Reduction & Environmental Stewardship (RRES)  
Remediation Services (RS), MS M992  
Los Alamos, New Mexico 87545  
(505) 667-0808/FAX (505) 665-4747



National Nuclear Security Administration  
Los Alamos Site Operations, MS A316  
Environmental Restoration Program  
Los Alamos, New Mexico 87544  
(505) 667-7203/FAX (505) 665-4504

Date: September 22, 2003  
Refer to: ER2003-0591



Ms. Sandra Martin  
Permits Management Program  
NMED – Hazardous Waste Bureau  
2905 Rodeo Park Drive East  
Building 1  
Santa Fe, NM 87505-6303

**SUBJECT: RESPONSE TO SEPTEMBER 4, 2003 LETTER, "DISAPPROVAL OF THE INVESTIGATION WORK PLAN (IWP) FOR MATERIAL DISPOSAL AREA C (MDA C) LOS ALAMOS NATIONAL LABORATORY (LANL) ENVIRONMENTAL PROTECTION AGENCY (EPA) ID#NM0890010515"**

Dear Ms. Martin:

The University of California (UC) and the U.S. Department of Energy (DOE) have reviewed your September 4, 2003 letter regarding MDA C, Solid Waste Management Unit 50-009 at Technical Area 50. We appreciate your staff's analysis of the document and would like clarification of some of the issues you pose.

The historical investigation report (HIR), submitted as Appendix B to the IWP data collected by LANL, identifies seven data gaps required to complete the characterization of MDA C. The IWP then details the sampling and analytical program recommended for each of the data gaps. The data gaps identified are the following:

1. extent of metals, cyanide and radionuclide contamination in tuff beneath Pit 6;
2. concentrations and spatial extent of volatile organic chemicals in the vapor phase in subsurface tuff;
3. concentrations and spatial extent of tritium in the vapor phase in subsurface tuff;
4. Nature and extent of potential release of metals, cyanide and radionuclides to tuff beneath Pits 1–5, Shaft Groups 1 and 2, and the strontium-90 disposal shaft;
5. extent of perchlorate, nitrate, dioxin and furan contamination in tuff;
6. presence of perched groundwater beneath MDA C; and
7. information on hydrogeologic properties and fracture characteristics to support contaminant transport modeling of the vadose zone at MDA C.

The comments provided in your September 4, 2003 letter do not specifically address whether the NMED concurs with these data gaps. The data gaps presented in the IWP provide the basis for the technical rationale used by the Laboratory to identify the investigation work scope (IWS) presented in the IWP. The Laboratory, therefore, believes that concurrence on data gaps is



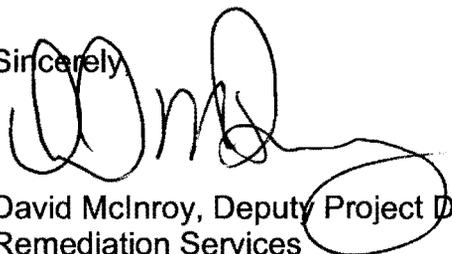
necessary before it is possible to address specific comments related to the technical approach presented in the IWP. Please let us know if NMED agrees with this list of data gaps or if you see additional data gaps required to complete the characterization of MDA C.

Your September 4, 2003 letter requires LANL to address NMED comments and resubmit the document within 30 days. In our September 17, 2003 letter (E2003-0590) we requested a meeting with your staff to review the MDA C IWP to reach agreement on content. We request that the 30 day clock start after the meeting occurs with you staff.

In addition, please provide the following information:

1. NMED states that LANL should delete references to a future Corrective Measure Study (CMS). Based on the information presented in the HIR, the Laboratory believes it is reasonable to expect that a CMS will be required at MDA C and is, therefore, using the proposed investigation to collect data necessary to support a CMS. This approach is consistent with DOE and the EPA guidance on streamlining the investigation and remediation process. Please indicate whether such an approach is acceptable to NMED, as an alternate approach may impact the overall cleanup schedule at MDA C.
2. The November 26, 2002 Order issued by NMED to UC and DOE does not provide any technical backup or rationale for the IWS presented for MDA C. As such, the Laboratory cannot evaluate the technical rationale for the technical approach presented in the IWP with that for the work scope presented in the Order. Please provide the NMED backup analysis for the number of boreholes, analytical suites, and analytical sample depths specified in the Order.

Sincerely,



David McInroy, Deputy Project Director  
Remediation Services  
Los Alamos National Laboratory

Sincerely,



David Gregory, Project Manager  
Department of Energy  
Los Alamos Site Operations

DM/DG/JH/dv

Cy:

J. Hopkins, RRES-RS, MS M992  
N. Quintana, RRES-RS, MS M992  
D. McInroy, RRES-RS, MS M992  
B. Ramsey, RRES-DO, MS J591  
D. Gregory, LASO, MS A316  
J. Kieling, NMED-HWB  
S. Martin, NMED-HWB

C. Voorhees, NMED-OB  
S. Yanicak, NMED-OB  
M. Leavitt, NMED-SWQ  
L. King, EPA Region 6  
RRES-RS (CT#C931), File, MS M992  
IM-5, MS A150  
RPF MS M707