

IA 53

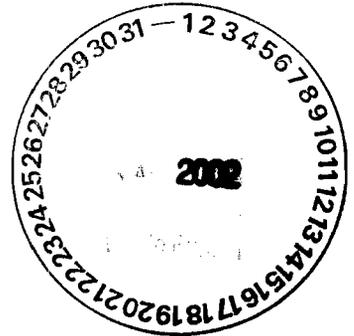
**ENVIRONMENTAL
RESTORATION
PROJECT**

Los Alamos National Laboratory/University of California
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Environmental Restoration (ER) Project, MS M992
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U.S. Department of Energy
Office of Los Alamos Site Operations, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
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Date: April 29, 2002
Refer to: ER2002-0303



Mr. John Young, Corrective Action Project Leader
Permits Management Program
NMED – Hazardous Waste Bureau
2905 Rodeo Park Drive East
Building 1
Santa Fe, NM 87505-6303

**SUBJECT: SUBMITTAL OF RESPONSE TO REQUEST FOR SUPPLEMENTAL
INFORMATION (RSI), INTERIM ACTION (IA) PLAN FOR POTENTIAL
RELEASE SITE (PRS) 53-002(a), LOS ALAMOS NATIONAL
LABORATORY, NM0890010515, HWB-LANL-01-028**

Dear Mr. Young:

Enclosed are two copies of the Los Alamos National Laboratory (LANL)
Environmental Restoration (ER) Project's Response to your RSI on the IA Plan for PRS
53-002(a). The ER Project Office received the RSI on April 10, 2002.

If you have any questions, please contact Gabriela Lopez Escobedo at (505)
665-7352 or David Gregory at (505) 667-5808.

Sincerely,

Julie A. Canepa, Program Manager
Environmental Restoration Project
Los Alamos National Laboratory

Sincerely,

Mat Johansen, Project Manager
Department of Energy
Office of Los Alamos Site Operations

JC/ET/NR/eim

Enclosure: Response to RSI (ER2002-0302)



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**Response to
“Request for Supplemental Information (RSI) on the Interim Action (IA) Plan for
Potential Release Site (PRS) 53-002(a),
Los Alamos National Laboratory, EPA ID: #NM0890010515,
Task Number HWB-LANL-01-028”**

INTRODUCTION

To facilitate review of this response, the comments of the Hazardous Waste Bureau (HWB) of the New Mexico Environment Department (NMED) are included verbatim.

COMMENTS

NMED Comment

1. *LANL conducted a pre-remediation human health risk assessment as part of this Interim Action (IA) Plan. That risk assessment indicates potential excess risk for both the residential and industrial scenarios; the risk assessment supports the need for an interim action based on excess risk from radionuclides and PCBs in both the sludge and liner. Section 3.0 states that there are no cleanup levels proposed for the IA. For the IA to be a final remedy, the post-remediation risk assessment would have to compare the residual contamination after removal of the sludge and liner to the screening levels based on residential criteria. In addition, residual contamination levels should be compared to LANL Ecological Screening Levels (ESLs) and any potential ecological risk should be addressed. Confirmatory sampling to support the future risk assessment should include PCBs (including Aroclor 1254) as well as radionuclides. Tritium is not included in the current risk assessment, but residual levels in the tuff will need to be considered in the post-remediation risk assessment. It would be advisable to delay site restoration activities until after the post-remediation risk assessment has been conducted and reviewed in case that assessment indicates the need for additional sampling or determines the type of restoration to be done.*

LANL Response

1. LANL agrees. The interim action is not a final remedy; rather it is an interim action. A complete human-health risk screening or health risk assessment will be required prior to identifying a site restoration remedy or proposing no further action for this site. Future risk assessments will include PCBs and tritium as well as other potential contaminants of concern at this PRS.

NMED Comment

2. *LANL shall perform representative full suite Appendix IX sampling during confirmatory sampling of the tuff following removal of the sludge and liner from the two northern impoundments.*

LANL Response

2. LANL agrees. Full-suite Appendix IX sampling of the tuff below the liner is needed in order to be able to perform a final risk assessment. Tuff samples will be collected and analyzed to determine if any potential contaminants are present below the clay liner in the two north lagoons at TA-53.