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**MEMO TO FILE**

**FROM:** VICKIE MARANVILLE, NMED HWB *(initials)*  
**SUBJECT:** COMMENTS for RFI REPORT FOR CONSOLIDATED PRS 73-005-99  
LOS ALAMOS NATIONAL LABORATORY  
EPA ID # NM0890010515  
TASK NUMBER HWB-LANL-00-013  
**DATE:** JANUARY 22, 2001

LANL HSWA 1/10/73

NMED reviewed the RFI REPORT FOR CONSOLIDATED PRS 73-005-99 dated July 2000 and referenced by LA-UR-00-1672 (ER2000-0144). NMED verbally provided the following comments to Terry Rust (LANL ER Project) during a telephone conversation on Wednesday January 17, 2001.

- § 2.3.4.3 Data Review (c) Evaluation of Organic Chemicals, p. 55

The sample results reported for acetone, methylene chloride, toluene, chloroform, xylene, and 1,2-dichlorobenzene in one to 17 samples should be quantified as not detected (U) because these chemicals were detected in the method blank and were indistinguishable from laboratory related contamination.

This statement is vague and needs further explanation. Specifically, what samples are being referred to, what are the concentrations of the detected contaminants, and which method blanks were the contaminants detected in? Were the samples quantified as U? Further clarification is required.

- § 2.3.5.1 Nature and Extent, p. 70

It was likely that materials discharged into the unlined septic pits would primarily move vertically because of the hydraulic head present and result in a concentration gradient with depth. Therefore, samples outside of the pit boundaries were not collected, as little lateral transport would have occurred. The sample data supports this assumption so no additional sampling for lateral extent for the septic pits is required.



TL

Addressee  
March 14, 2000  
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Since data was not collected, what data is being used to support the assumption that lateral movement has not occurred. Further clarification is needed. If data was used to make the assumption that lateral extent has been defined, please supply the data for NMED review and approval.

- § 2.3.5.1 Nature and Extent, p. 70-71

The detailed discussion of the canyon investigation is not needed. This discussion can be simplified. In addition, assumptions were made by combining several geomorphic units. Since the geomorphic units may behave differently, they can not be combined to make a general assumption. For accuracy and clarity, it should be noted that the investigation went to the canyon bottom and the samples collected during this phase of investigation indicate that contamination from the consolidated PRS's was not present in the canyon bottom. Based on the information obtained during this phase of investigation, it does not appear that a release occurred from the consolidated PRS's.

- Figure 2.3-25, p. 73

The legend is extremely vague. Additional information or geomorphic names and a brief description are needed. Based on the information provided, the reader can not fully evaluate figure. In the future, additional detail should be included.

LANL provide an explanation to NMED regarding the comments. If information is submitted by LANL to clarify any of the comments, it references the telephone conversation. NMED will not provide an RSI to LANL. Once all of the NMED concerns have been fully addressed by LANL, NMED will provide an approval letter to LANL. The approval letter may reference the telephone conversation or any additional information submitted to NMED by LANL.

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