



Department of Energy

Field Office, Albuquerque
Kirtland Area Office
P.O. Box 5400
Albuquerque, New Mexico 87115

Rem 100
SNL-HSW/B...
V
Bob S. X
Dale C.
SK L

FEB 08 1996

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

Mr. Benito Garcia, Bureau Chief
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
2044 Galisteo Street
P.O. Box 26110
Santa Fe, NM 87505-2100

FEB 12 1996

Dear Mr. Garcia:

I kept 1 copy - Bob S.

Enclosed are two copies of the response to Environmental Protection Agency (EPA) Notice of Deficiency (NOD) comments on the OU 1334, Central Coyote Test Area, RFI Work Plan for Sandia National Laboratories', New Mexico (SNL/NM), ID Number NM5890110518-1.

If you have any questions, please contact John Gould at (505) 845-6089, or Mark Jackson at (505) 845-6288.

Sincerely,

George K. Zaskar
Michael J. Zamorski
Acting Area Manager

Enclosure

cc w/enclosure:
T. Trujillo, AL, ERD
W. Cox, MS 1147, SNL
N. Weber, NMED/AIP
L. Aker, NMED/AIP

cc w/o enclosure:
J. Johnsen, KAO/AIP
E. Krauss, SNL, MS 0141
D. Fate, SNL, MS 1148
C. Lojek, SNL, MS 1148
D. Neleigh, EPA, Region VI

[Handwritten checkmark]



Response to EPA NOD Comments on the RFI Work Plan
for OU 1334, Central Coyote Test Area
Sandia National Laboratories, New Mexico
Environmental Restoration Project

I certify under penalty of law that the attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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 or imprisonment for knowing violations.

Approved by:

M. Lynn Jones 1/28/96
M. Lynn Jones Date
Vice President
Laboratories Services Division
Division 7000
Sandia National Laboratories, New Mexico
Operator

George K. Lockman 2/8/96
Michael J. Zamorski Date
Acting Area Manager
Kirtland Area Office
Department of Energy
Albuquerque Operations Office

**Response to November 24, 1995 EPA NOD Comments on the
OU 1334 Central Coyote Test Area RFI Work Plan,
Sandia National Laboratories**

1. As discussed in the April 13, 1995 meeting with Sandia National Laboratories (SNL), the New Mexico Environment Department (NMED) and EPA, toxicity characteristic leachate procedure (TCLP) analyses will be performed on waste piles at Sites 9, 57A, 61A, and 68 to characterize source materials for removal prior to RFI sampling. If the waste piles at these sites are not removed before RFI sampling, then samples of the waste materials will be analyzed for total constituents. In both cases, environmental media samples will be collected below the waste piles to determine if a release has occurred. Please revise the work plan accordingly.

Response: In addition to TCLP analyses, SNL agrees to analyze debris pile samples for total constituents. The results will be used for a risk assessment and will allow SNL to evaluate remediation methods for a possible corrective measures study (CMS), to govern the proper disposal of debris pile materials, or to justify the use of separated soil as onsite backfill. An addendum to the RFI Work Plan will be issued.

2. Because native soil lies within three inches of the surface and the mobility of contaminants is expected to be low, the sampling intervals listed in Table 5-10, page 5-74, shall be revised from 0-6 in. and 18-24 in. to 0-6 in. and 6-12 in. Please revise the work plan accordingly.

Response: SNL agrees that 0-6 in. and 18-24 in. sampling intervals are inappropriate for the Central Coyote Test Area sites. The original depths were selected to ensure that samples were collected in native material underlying wind-blown soil deposits at these sites. Further investigation indicates that wind-blown soil deposits are only 1-3 in. thick or absent at many sites. SNL will sample at 0-6 in. and 6-12 in. rather than 0-6 in. and 18-24 in. for sites in the OU 1334 RFI Work Plan. An addendum to the Work Plan will be issued.

3. Because fuel oil was potentially used in the basin and pit described on page 5-116, Drainage Ditch and Overflow Basin, and Plastic-Lined Pit, a sample should be collected at a depth of three feet in the basin and pit and analyzed for volatile organic compounds. Please revise the work plan accordingly.

Sandia Responses to EPA NOD Comments on the Central Coyote Test Area RFI Work Plan

Response: SNL agrees to analyze samples collected from the overflow basin and the plastic-lined pit for VOCs. Additionally, a recent inspection of the "borrow pits" indicated that thermocouple wires were set into the bottom of the north pit, suggesting that this pit was also used for burn tests. Based on this new information, SNL will also analyze samples from the north pit for VOCs. Samples will be collected at depths of 0-6 in., 6-12 in., and 3 ft at the overflow basin, plastic-lined pit, and north borrow pit. An addendum to the Work Plan will be issued.

4. Site 21, Metal Scrap, and Site 71, Moonlight Shot Area, were recently denied No Further Action (NFA) determinations. These sites should be added to the Central Coyote Test Area RFI Work Plan. Sampling plans for these sites should be included in the response to this notice of deficiency. Alternatively, Sandia may submit Voluntary Corrective Measure plans to remove debris and sample at Site 21, and to conduct high explosives testing at Site 71.

Response: Sites 21 and 71 are currently being addressed under separate NFA confirmatory sampling plans. Preliminary "scoping" sampling has already been performed which included sending splits of 20 percent of the samples for analysis offsite as a QA/QC check on onsite laboratory analytical results. SNL anticipates using these confirmatory sampling results in an NFA proposal resubmittal. The sampling plans and analytical results for Sites 21 and 71 will be included with the resubmitted NFA proposals.

5. Similarly, Site 22, Storage/Burn, which was submitted for NFA consideration in June 1995, shall be added to the Central Coyote Test Area RFI Work Plan if not approved for NFA. Site 70, Explosives Test Pit, and Site 88B, Firing Site: Instrumentation Poles, shall also be added to the Central Coyote Test Area RFI Work Plan if not approved for NFA. Sampling plans will be requested at the time of the NFA denial, if applicable.

Response: Sites 22, 70, and 88B are in the process of being proposed for NFAs. The sampling plans and analytical results for these sites will be included with the NFA proposals. The Site 22 NFA proposal was submitted in August 1995, but due to an error in the data tables, regulatory agencies could not complete their review. SNL is planning to submit a corrected NFA proposal for Site 22 in March 1996. Confirmatory sampling was completed at Site 70 in December 1994 and SNL is planning to submit an NFA proposal in March 1996. NFA confirmatory sampling was conducted at Site 88B in April 1995. However, because there are potential cultural resources at the site that may

Sandia Responses to EPA NOD Comments on the Central Coyote Test Area RFI Work Plan

be disturbed, SNL has been unable to complete the proposed sampling. SNL is currently awaiting authorization to proceed from the New Mexico State Historic Preservation Office. An NFA proposal will be submitted as soon as possible following this authorization.

6. Please submit an updated project schedule for the investigation of the Central Coyote Test Area.

Response: An updated project schedule is attached.

Attachment

Revised Schedule for OU 1334 Central Coyote Test Area Investigations

Activity ID	Activity description	Early start	Early finish	Original duration	Budgeted cost	Year					
						1994	1995	1996	1997	1998	1999
CW10000000	CENTRAL COYOTE TEST AREA - ADS 1334	01OCT93	30SEP99	1507*	0	CENTRAL					
CW10000004	SUBPROJECT OVERSIGHT	01OCT93	30SEP99	1507*	0	SUBPROJ					
CW10000006	FY 94	01OCT93*	30SEP94	252*	176910	FY 94					
CW10000008	FY 95	03OCT94*	29SEP95	251*	79790	FY 95					
CW10000010	BCP 96-001 1st Qtr Adjustment	02OCT95*	22DEC95	59*	10159	BCP 96-001 1st Qtr Adjustment					
CW10000012	FY 97	01OCT96*	30SEP97	251*	87595	FY 97					
CW10000014	FY 98	01OCT97*	30SEP98	251*	87510	FY 98					
CW10000016	FY 99	01OCT98*	30SEP99	251	86915	FY 99					
CW10000018	RFI WORK PLAN	01OCT93A	23JUN95	435*	0	RFI WORK PLAN					
CW1000002	Assessment/Site Investigation	01OCT93	30SEP99	1507*	0	Assessment/Site Investigation					
CW10000020	Site Background	01OCT93A	26MAY94	164*	186103	Site Background					
CW10000022	Special Studies	03NOV93	26AUG94	205*	0	Special Studies					
CW10000024	EOD/UXO Surveys	03NOV93*	26JAN94	55*	217614	EOD/UXO Surveys					
CW10000026	Radiological Surveys	03JAN94*	28JUN94	126*	159516	Radiological Surveys					
CW10000028	Radiological Surveys	03JAN94*	05JUL94	130*	120745	Radiological Surveys					
CW10000030	Rad-Machine Shop/Site9	21MAR94*	25APR94	26*	5000	Rad-Machine Shop/Site9					
CW10000032	Hydrogeological Studies	03JAN94*	08APR94	70*	84550	Hydrogeological Studies					
CW10000034	Archaeological Studies	24FEB94*	26AUG94	130*	10680	Archaeological Studies					
CW10000036	Ecological Studies	24FEB94*	26AUG94	130*	10680	Ecological Studies					
CW10000038	Other Special Studies	03JAN94*	08APR94	70*	42180	Other Special Studies					
CW10000040	Other Special Studies	03JAN94*	28JUN94	126*	50053	Other Special Studies					
CW10000042	NFA Proposal Development /Review/ Approval	14APR95*	23JUN95	50	61952	NFA Proposal Development /Review/ Approval					
CW10000044	Prepare Draft	03JAN94	26MAY94	104*	0	Prepare Draft					
CW10000046	Introduction/Tech Approach	07FEB94*	16FEB94	8*	24147	Introduction/Tech Approach					
CW10000048	Background Information	07FEB94*	11FEB94	5*	29487	Background Information					
CW10000050	Environmental Setting	03JAN94*	21APR94	79*	16067	Environmental Setting					
CW10000052	Evaluation of SWMUs	07FEB94*	08APR94	45*	97095	Evaluation of SWMUs					
CW10000054	Health and Safety Plan	07FEB94*	22APR94	55*	24645	Health and Safety Plan					
CW10000056	QA Project Plan	07FEB94*	22APR94	55*	24645	QA Project Plan					
CW10000058	Production Process	02MAY94*	26MAY94	19*	22232	Production Process					
CW10000060	Review Cycle	26MAY94	23JUN94	20*	0	Review Cycle					
CW10000062	Internal Review	26MAY94*	23JUN94	20*	6752	Internal Review					
CW10000064	Address Comments	24JUN94*	01AUG94	26*	24948	Address Comments					

Project Start 01SEP90  Early Bar
 Project Finish 30SEP99  Progress Bar
 Date Date 01OCT93  Critical Activity
 Plot Date 16JAN96

ERBL1334

SANDIA NATIONAL LABORATORIES
 Central Coyote Test Area
 Classic Schedule Layout

Sheet 1 of 18

Activity ID	Activity description	Early start	Early finish	Original duration	Budgeted cost	1994	1995	1996	1997	1998	1999	2000
CW10006164	NFA - Site 88 B - Milestone		17JAN97	0	0							

◆ NFA - Site 88 B - Milestone