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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

March 6, 1997

Mr. Michael J. Zamorski
Acting Area Director
Kirtland Area Office
US Department of Energy
P.O. Box 5400
Albuquerque, New Mexico 87185-5400

RE: Request for supplemental information:
RCRA Facility Investigation Work Plan,
Operating Unit 1332, Foothills Test Area,
Sandia National Laboratories

Dear Mr. Zamorski:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department has received and reviewed the US Department of Energy/Sandia National Laboratories/New Mexico responses (dated August 5, 1996) to the Notice of Deficiency issued for the RCRA Facility Investigation Work Plan for Operating Unit 1332, the Foothills Test Area. HRMB has several comments which must be addressed in order to complete review. These comments, including comments from the US Environmental Protection Agency, are enclosed.

Final changes to the Work Plan in response to these comments and as indicated in your August 5 responses should be submitted within 30 days of receipt of this letter. Please provide the requested changes on replacement pages to the original Work Plan.

Please contact Stephanie Kruse of my staff at 827-1561 if you have any questions or comments.

Sincerely,

Robert S. (Stu) Dinwiddie, Manager
RCRA Permits Management Program

Hazardous and Radioactive Materials Bureau



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Enclosure

xc: Bill Stone, NMED/DOE OB
Mark Jackson, DOE/KAO
Warren Cox, SNL
David Neleigh, EPA 6PD-N
Stu Dinwiddie, NMED/HRMB
Stephanie Kruse, NMED/HRMB
FILE: HSWA, SNL, 97
TRACK: SNL, 3/6/97, DOE, HRMB/SK, RE

RSD/SK

**COMMENTS ON DOE/SNL
AUGUST 5, 1996 RESPONSES TO NOD,
RCRA FACILITY INVESTIGATION WORK PLAN,
OU 1332, FOOTHILLS TEST AREA**

General Comments

A project schedule should be submitted for inclusion in the Work Plan.

The following comments are numbered to correspond to the Sandia National Laboratories (SNL) August 5, 1996 responses.

1. Under the New Mexico Environmental Improvement Board Solid Waste Management Regulations (SWMR-4), the New Mexico Environment Department (NMED) Solid Waste Bureau may opt to have Sandia National Laboratories (SNL) remove nonhazardous solid waste from a site. SNL should consider removing and properly disposing of all nuisance and threatening nonhazardous solid waste. Also, if hazardous materials are potentially present (asbestos at Site 58, Feature DD, or a degraded battery at Site 58, Feature NN), these materials should be removed and disposed of appropriately, and any contamination addressed.
2. The response is adequate.

Specific Comments

3. The response is adequate.
4. The response is adequate.
5. NMED recognizes that available ground water quality data for the ground water wells and springs within and directly adjacent to the Foothills Test Area have been previously submitted to NMED in various reports. It would be helpful, however, to have this information summarized in this and other RFI Work Plans.

The modified Table 3-3 should include the dates when the water levels were measured.

6. The locations of the wells should be shown on Figure 3-3 and, if appropriate, information about them should be listed in Table 3-1. It is not possible to tell if the referenced wells are Target Road North and Target Road South.
7. The response to this comment does not adequately address concerns regarding some potentially contaminated materials at ER Site 28-2. The lower adit appears to have been used for experimental or disposal purposes. Sufficient evidence has not been presented to indicate that a release of hazardous or radioactive constituents did not occur, or, if there was a release, that the concentrations of contaminants pose an acceptable level of risk under the projected land use.

1. SNL should, through sampling or other analytical means, demonstrate that no radioactive, hazardous or mixed waste was disposed of within the concrete block and excavation of the fill material.
2. The black residue on the ribs and back, as well as behind the concrete block, should be sampled and analyzed for nitroaromatics.
8. The response is adequate.
9. In the response, SNL states "*If based on the soil borings and re-evaluation of the data, a potential to reach groundwater exists, a monitoring well will be installed. The well will not be completed and will be properly abandoned if no water is found during drilling...*".

Depending on the nature of the contaminant, historical operations, and site conditions, the presence of inorganic constituents of concern (COCs) at concentrations above background or the presence of organic COCs at any concentration may trigger the need for groundwater monitoring. Additionally, SNL should discuss the type of drilling equipment and methods that will be used to install wells and explain the decision logic to conclude whether ground water is present. The decision logic should include a consideration of drilling depths.

10. Because debris is scattered throughout the site, the additional grab samples requested by NMED must be obtained.
11. The response is adequate.
12. Because sediment may have spalled off the sides of the borehole over time, partially filling in the borehole, a series of samples should be collected starting at the "measured depth" and continuing at intervals below that depth. Because little is known about Feature OO, the samples should be analyzed for VOCs, SVOC, metals, HE, gross alpha, gross beta, and gamma spectroscopy. The Geoprobe™ may not be the optimum sampling instrument for this purpose because the required sample volume is large.
13. The response is adequate.
14. There is a concern regarding the potential of hazardous constituent releases at this site because of unknown waste management activities. SNL must determine how the nonpotable water was used and where the sink drain leads.
15. The response is adequate.
16. The adequacy of the response is subject to receipt and review of the referenced sampling data.
17. An unknown number of burn tests were conducted at the site using simulated missile silos. Each burn test is reported to have utilized 750 gallons of JP-4 fuel. The dimensions, the geometry, and the design of each test unit are also unknown. Because so little is known about this particular site, the period of usage may be critical for a corrective action determination.
18. With regard to Items #1 and #2, judgmental samples should be collected where staining, discoloration, or elevated radioactivity occurs.

19. Although a Voluntary Corrective Measure was conducted by SNL at this site, there is a concern whether the confirmation sampling was adequate to detect a significant release. Because of apparent waste management practices (e.g., burning of JP-4 fuel and disposal of radioactive wastes), and the area where disposal could have occurred, at least four soil borings should be completed to confirm that no significant hazardous constituent releases have occurred.
20. See comment # 16.
21. See comment #16.
22. See comment #16.
23. The response is adequate.
24. The response is adequate.
25. Please submit the revised table so that it can be included in the RFI Work Plan.
26. Please clarify whether the arroyo that drains the area was included in the 100% gamma radiation survey.
27. See comment #16.
28. Please submit the revised table so that it can be included in the Work Plan.
29. The response is adequate.

Attachment II General Comments

1. The response is adequate.
2. The response is acceptable at this time, pending resolution of the issue of eco-risk.
3. The response is adequate at this time, pending resolution of the issue of future land use scenarios.