



*Stu*

# Department of Energy

Field Office, Albuquerque  
Kirtland Area Office  
P.O. Box 5400  
Albuquerque New Mexico 87185-5400

## 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



Dear Mr. Garcia:

Enclosed are two copies of the Department of Energy (DOE)/ Sandia National Laboratories/New Mexico (SNL/NM) response to the NMED Notice of Deficiency (NOD) for the third submission of No Further Action (NFA) proposals. NOD responses are provided for the following environmental restoration sites:

- OU 1295 - Septic Tanks and Drain Fields
  - Site 142 - Building 9970 Septic System
  - Site 143 - Building 9972 Septic System
  - Site 146 - Building 9920 Drain System
  - Site 148 - Building 9927 Septic System
- OU 1332 - Foothills Test Area
  - Site 15 - Trash Pits
  - Site 27 - Building 9820 Animal Disposal Pit
  - Site 28-2 - Mine Shaft
  - Site 28-10 - Mine Shaft
  - Site 67 - Frustration Site
- OU 1333 - Canyons Test Area
  - Site 59 - Pendulum Site
  - Site 63A - Balloon Test Area
  - Site 63B - Balloon Test Area
  - Site 64 - Gun Site
  - Site 92 - Pressure Vessel Test Site

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

Sincerely,

*George K. Jackson*  
Michael J. Zamorski  
Acting Area Manager

Enclosures

HSWA SNL 1295  
1332  
1333



Benito Garcia

cc w/enclosure:

T. Trujillo, AL, ERD

W. Cox, SNL, MS 1147

J. Parker, NMED-OB

R. Kennett, NMED-OB

D. Neleigh, EPA, Region 6 (2 copies via certified mail)

cc w/o enclosure:

B. Oms, KAO-OB

B. Galloway, SNL, MS 1147

C. Byrd, SNL, MS 1148

S. Young, SNL, MS 1147

S. Dinwiddie, NMED

T. Davis, NMED

S. Kruse, NMED

# Sandia National Laboratories Albuquerque, New Mexico June 1997

## Environmental Restoration Project Responses to NMED Technical Comments on No Further Action Proposals Dated August 1995

### INTRODUCTION

This document responds to comments received in a letter from the State of New Mexico Environment Department to the U.S. Department of Energy (Zamorski, April 28, 1997) documenting the review of 14 No Further Action (NFA) Proposals submitted in August 1995.

This response document is organized in sections by operable unit (OU) and subdivided in numerical order by site number. Each OU section provides NMED comments repeated in **bold** by comment number and by site number in the same order as provided in the call for response to comments. The DOE/SNL response is written in normal font style on a separate line under "Response". Responses to general technical comments begin on page 3 and responses to site-specific technical comments begin on page 5. Additional supporting information for the general and site-specific comments is included as figures and tables within each comment and as attachments within each section, as appropriate. When referenced in the site-specific NOD responses, risk assessment analyses will be submitted to NMED at a later date.



## TABLE OF CONTENTS

	<u>Page</u>
GENERAL COMMENTS .....	3
Attachment A—Final Site Maps for OUs 1295, 1332, and 1333 .....	Tab A
SITE-SPECIFIC COMMENTS	
OU 1295 .....	5
OU 1332 .....	12
Attachment A—Corrected Site Map .....	Tab A
Attachment B—Results of Radiation Surveys .....	Tab B
Attachment C—Original Field Reports .....	Tab C
OU 1333 .....	16
Attachment A—Analytical Results for Soil Samples .....	Tab A

**RESPONSES TO NMED COMMENTS  
ON NO FURTHER ACTION PROPOSALS  
DATED AUGUST 1995**

**GENERAL COMMENTS**

- 1. Final, rather than draft, site maps should be provided for each unit proposed for No Further Action (NFA). (Needed for adequate review)**

Response: Final site maps for OUs 1295, 1332, and 1333 are provided in Attachment A of this section. In addition, all future NFA submittals will be submitted with final rather than draft site maps.

- 2. Interviews alone are not sufficient documentation to make an NFA determination. Site history and interviews can be used to guide an investigation or confirm other evidence, but are not sufficient by themselves. In the absence of any other supporting information, screening sampling should be conducted to further corroborate the interview and site history information. (Best Professional Judgment)**

**In most cases, an NFA proposal is not likely to be approved unless it is based on some sampling and analysis of the medium/media of concern. (Best Professional Judgment)**

Response: DOE/SNL believe that, where the actual persons involved with the operation, at the time of the suspected release, provide first-hand, eyewitness accounts, they are reliable sources of information. In most cases, a combination of information is used to determine whether a release has occurred, including sampling. In some cases the suspect media has been removed, and therefore can no longer be sampled. In summary, each case must be judged individually. Where additional sampling is appropriate for those sites reviewed in the third round of NFAs, it is so stated under the site-by-site responses given below.

- 3. Analytical results obtained at Environmental Restoration (ER) sites should be compared with sitewide background concentrations, when approved by the New Mexico Environment Department, to determine whether contamination has occurred. (Best Professional Judgment)**

## General Comments

Response: DOE/SNL are currently in the process of negotiating site-wide background concentrations with the New Mexico Environment Department (NMED), and expect that all values except those for OUs 1332, 1333, and 1334 to be approved. Upon final approval of the site-wide background study report, all OUs except for OUs 1332, 1333, and 1334 will compare analytical results to the background concentrations contained in the report. Additional background samples will be collected at OUs 1332, 1333, and 1334 upon mutual agreement with NMED of locations for such sampling.

- 4. A sampling and analysis plan or RFI Work Plan should be submitted prior to the start of any sampling activities conducted as a result of this Notice of Deficiency. (Permit Condition J.1)**

Response: Where sampling is anticipated, a sampling and analysis plan is developed which is provided to the NMED. Meetings with the NMED Oversight Bureau are scheduled in order to review these sampling plans and make any changes in the technical approach that would benefit the investigation. These practices will continue. However, DOE/SNL may not have always provided the NMED Hazardous and Radioactive Material Bureau with such sampling plans, or an invitation to participate in pre-sampling discussions. If that has happened, it was an oversight for which DOE/SNL apologizes. DOE/SNL will make every effort in the future to be inclusive in the pre-sampling discussions with all appropriate elements of NMED.

- 5. Any sources cited in NFA proposals should be documented and referenced. The source documents should be readily available to the public and to any reviewers. (Additional information needed for adequate review)**

Response: Sources cited in all current submissions of NFA proposals are documented and referenced. General ER Project documents (e.g., RFI Work Plans, RFI Reports, NFAs, the Program Implementation Plan, etc.) are available to the public and other reviewers at the DOE Public Reading Room located at the Library Building at Albuquerque Technical-Vocational Institute, Joseph M. Montoya Campus, at 4700 Morris Avenue, NE. DOE/KAO will continue its practice of simultaneously transmitting to NMED copies of all documents sent to the Public Reading Room. OU-specific archival references are located at the ER Project Records Center. The public and regulators can access information from the ER Project Records Center by verbal or written request to John Gould, DOE/KAO, at (505) 845-6089.

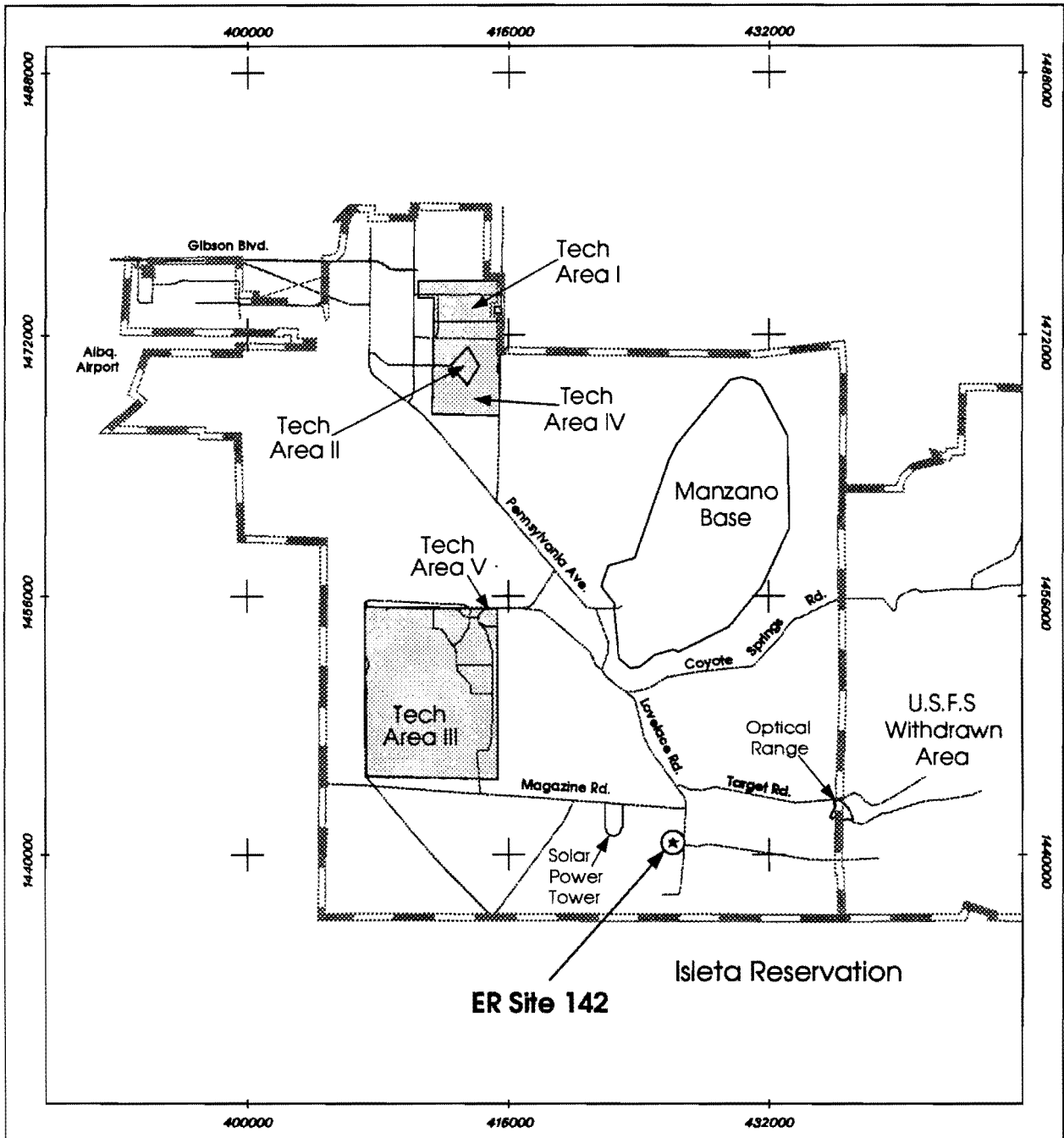
**General Comments**

**ATTACHMENT A**  
**FINAL SITE MAPS FOR**  
**OUs 1295, 1332, AND 1333**





**General Comments**

**FINAL SITE MAPS FOR OU 1295**





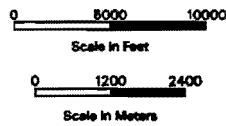
**Legend**

-  ER Site 142
-  Major Roads
-  KAFB Boundary
-  Technical Areas

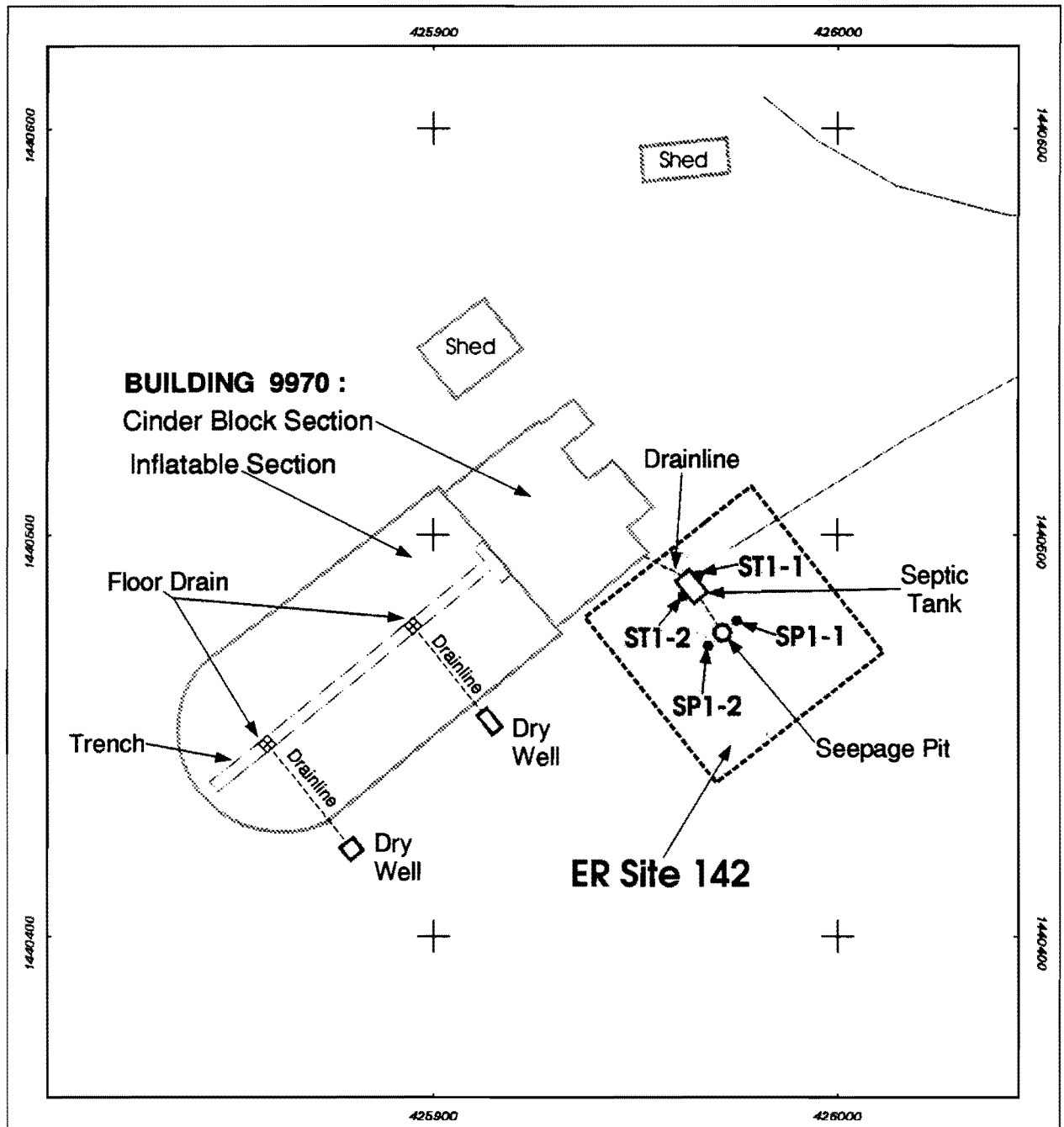
**Sandia National Laboratories, New Mexico  
Environmental Restoration Geographic Information System**

Transverse Mercator Projection, New Mexico State Plane Coordinate System, Central Zone  
1927 North American Horizontal Datum, 1983 North American Vertical Datum

Unclassified



**FIGURE 1  
Location Map for ER Site 142  
Sandia National Laboratories,  
New Mexico**



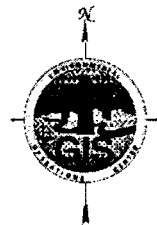
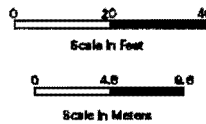
**Legend**

- Boring Location
- ◆ Floor Drain
- KAFB Roads
- ⋯ Buildings
- - - Drainline
- ⋮ ER Site 142

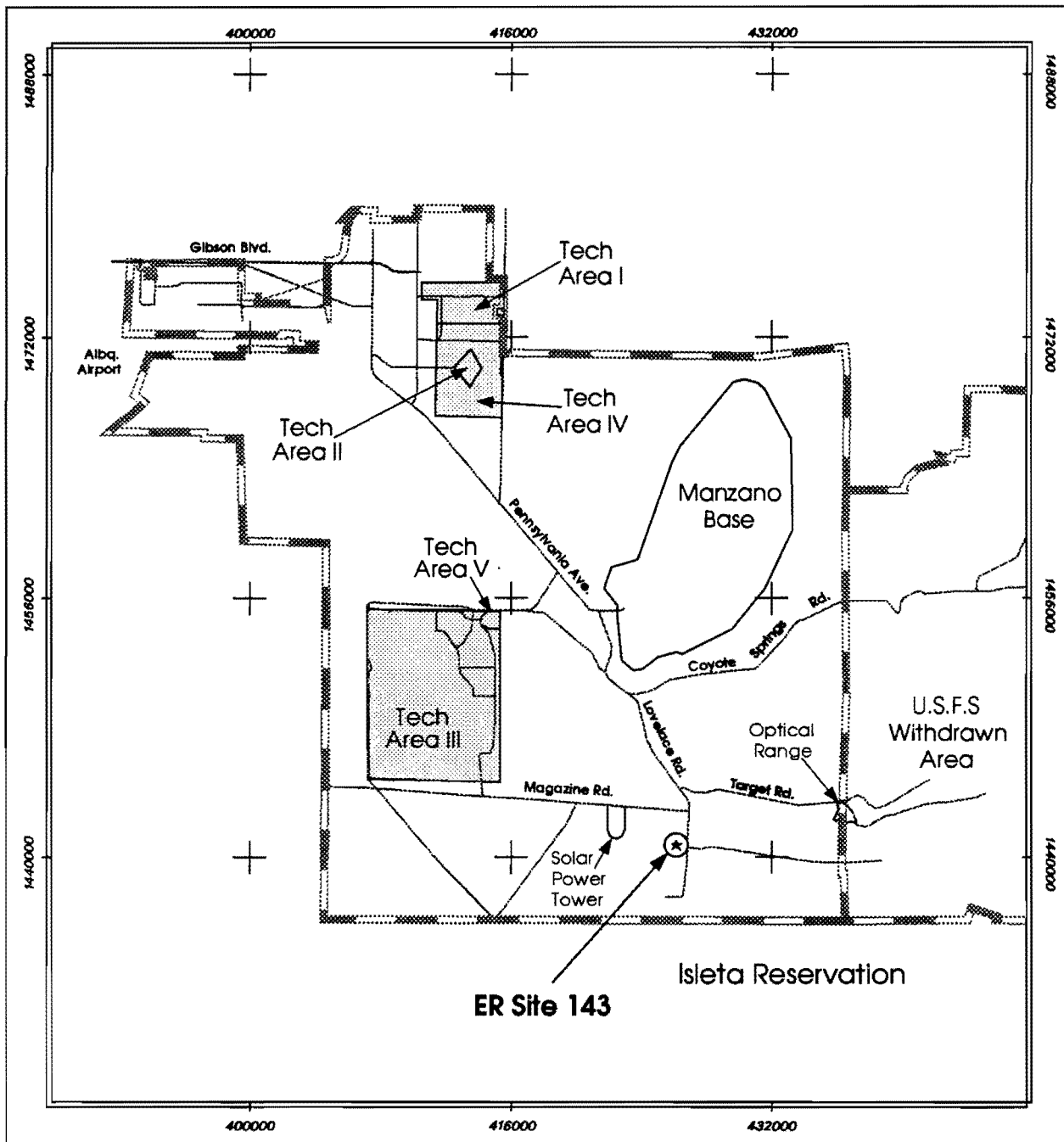
**Sandia National Laboratories, New Mexico  
Environmental Geographic Information System**

*Transverse Mercator Projection, New Mexico State Plane Geospatial System, Central Zone  
1987 North American Horizontal Datum, 1928 North American Vertical Datum*





Unclassified



**FIGURE 2  
Site Map for ER Site 142  
Sandia National Laboratories,  
New Mexico**



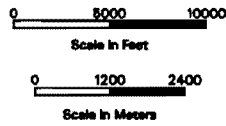
**Legend**

-  ER Site 143
-  Major Roads
-  KAFB Boundary
-  Technical Areas

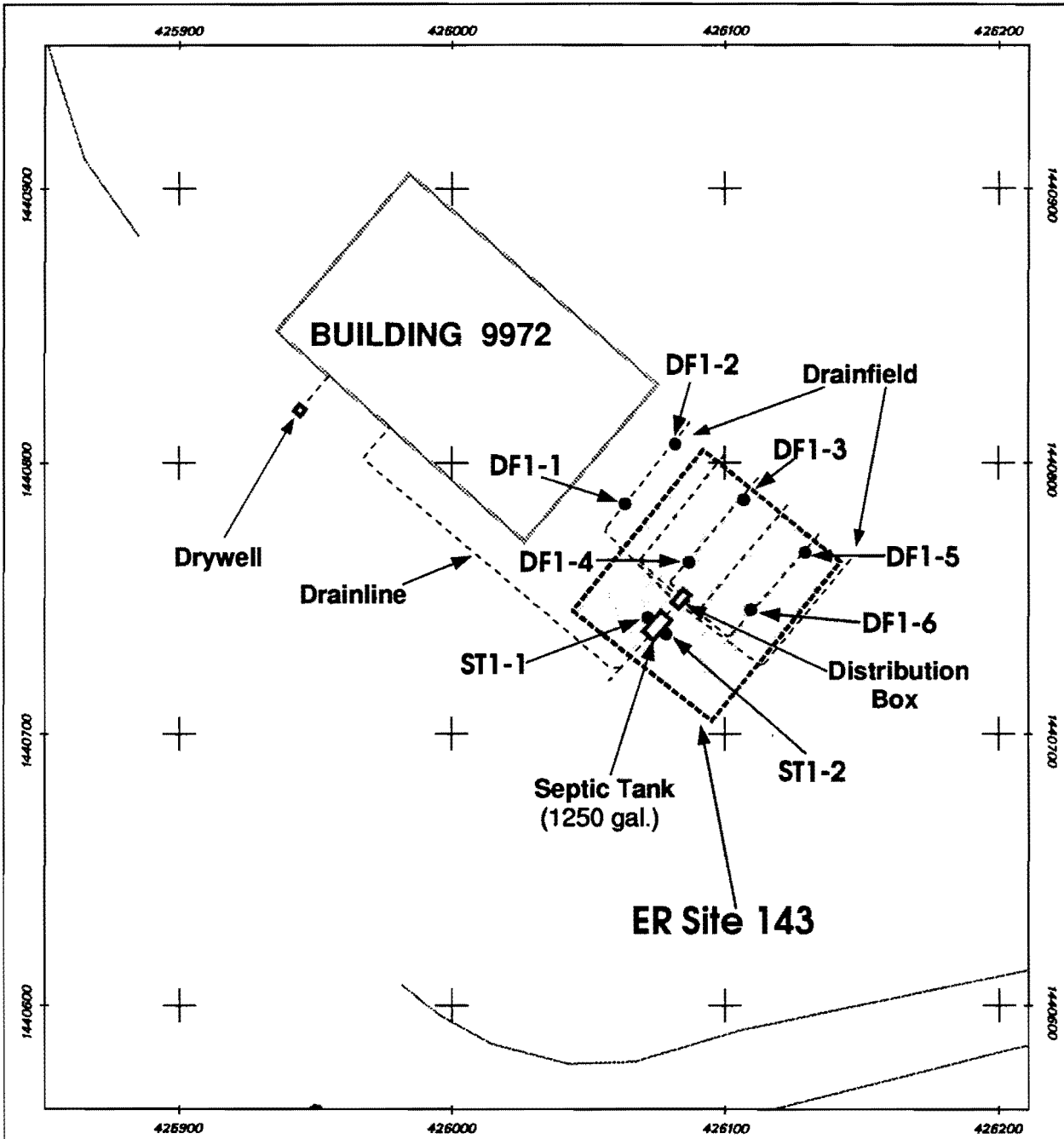
**Sandia National Laboratories, New Mexico  
Environmental Restoration Geographic Information System**

Transverse Mercator Projection, New Mexico State Plane Coordinate System, Central Zone  
1987 North American Horizontal Datum, 1989 North American Vertical Datum

Unclassified



**FIGURE 1  
Location Map for ER Site 143  
Sandia National Laboratories,  
New Mexico**



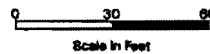
**Legend**

- Boring Location
- KAFB Roads
- ▨ Buildings
- - - Drainline
- ▭ Septic Tank, Distribution Box, Drywell
- ▭ ER Site 143

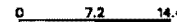
**Sandia National Laboratories, New Mexico  
Environmental Restoration Geographic Information System**

*Transverse Mercator Projection, New Mexico State Plane Coordinate System, Central Zone  
1983 North American Horizontal Datum, 1983 North American Vertical Datum*

Unclassified



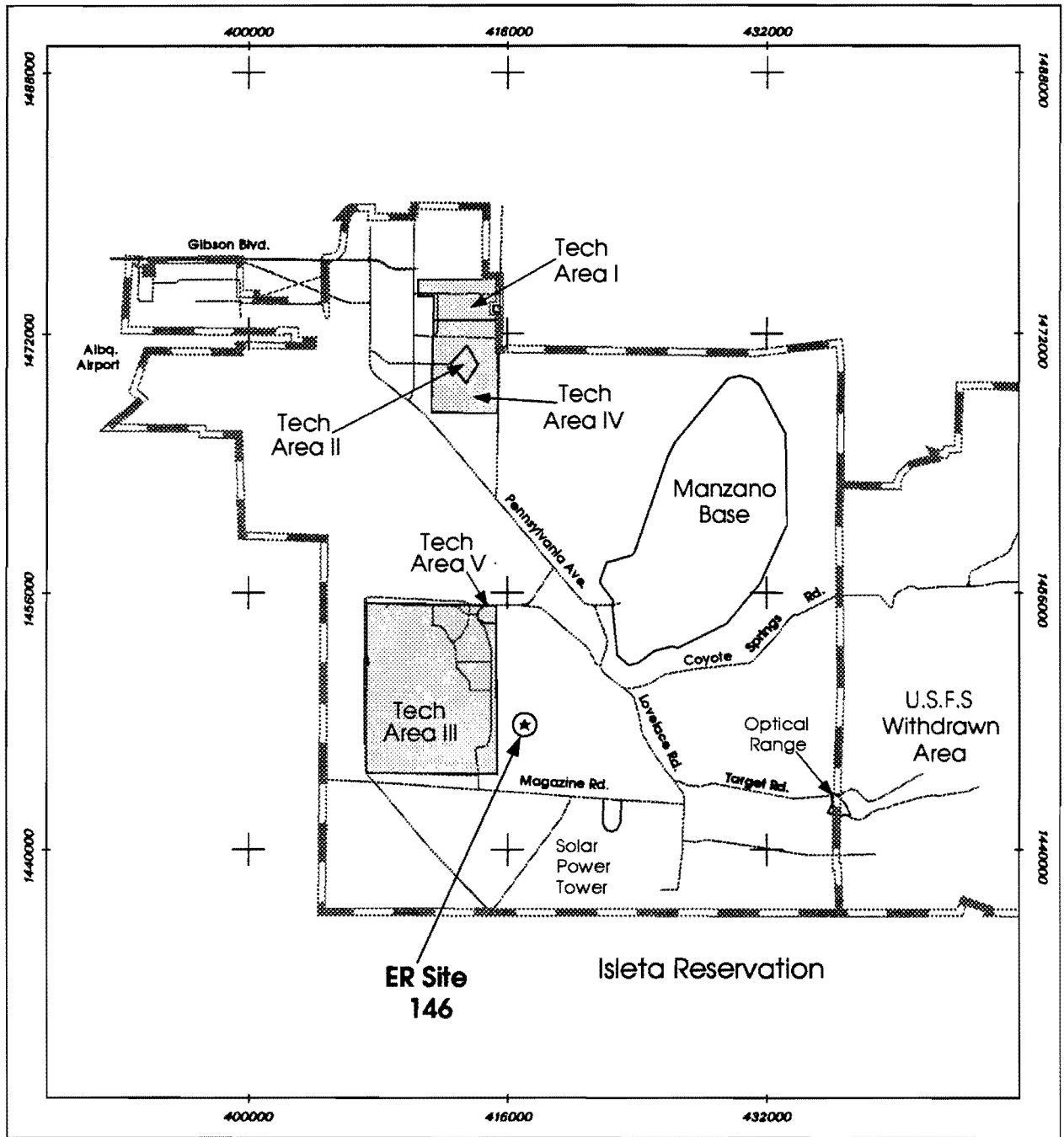
Scale in Feet







Scale in Meters



**FIGURE 2  
Site Map for ER Site 143  
Sandia National Laboratories,  
New Mexico**



**Legend**

-  ER Site 146
-  Major Roads
-  KAFB Boundary
-  Technical Areas

**Sandia National Laboratories, New Mexico  
Environmental Restoration Geographic Information System**

Transverse Mercator Projection, New Mexico State Plane Coordinate System, Central Zone  
1927 North American Horizontal Datum, 1923 North American Vertical Datum

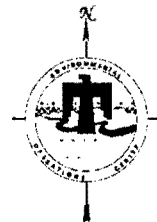
Unclassified



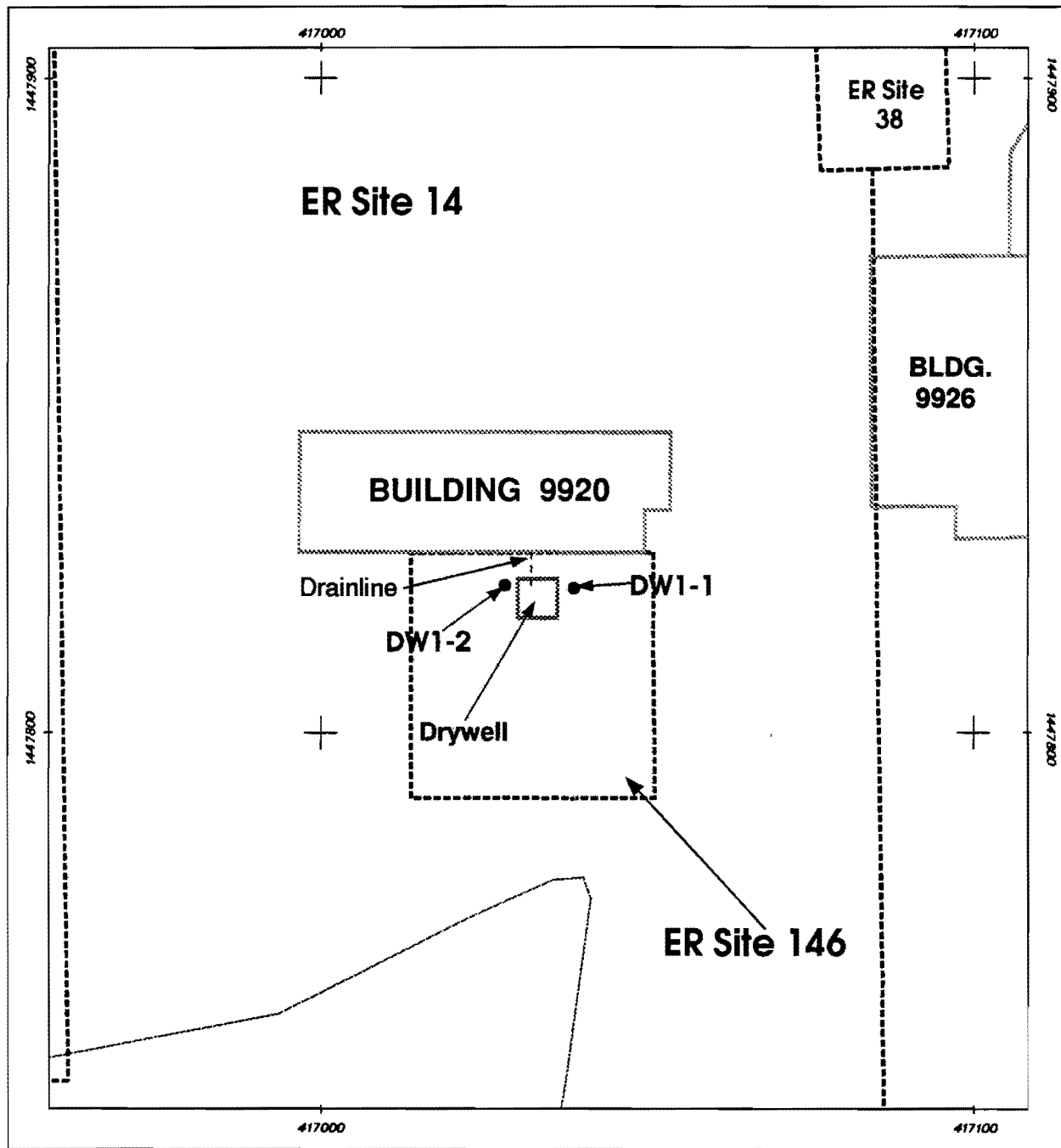
Scale in Feet



Scale in Meters



**FIGURE 1  
Location Map for ER Site 146  
Sandia National Laboratories,  
New Mexico**



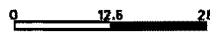
**Legend**

- Boring Location
- KAFB Roads
- ..... Buildings
- - - - - Drainline
- ..... Dry Well
- ER Site 146

**Sandia National Laboratories, New Mexico  
Environmental Restoration Geographic Information System**

*Transverse Mercator Projection, New Mexico State Plane Coordinate System, Central Zone  
1987 North American Horizontal Datum, 1989 North American Vertical Datum*

Unclassified



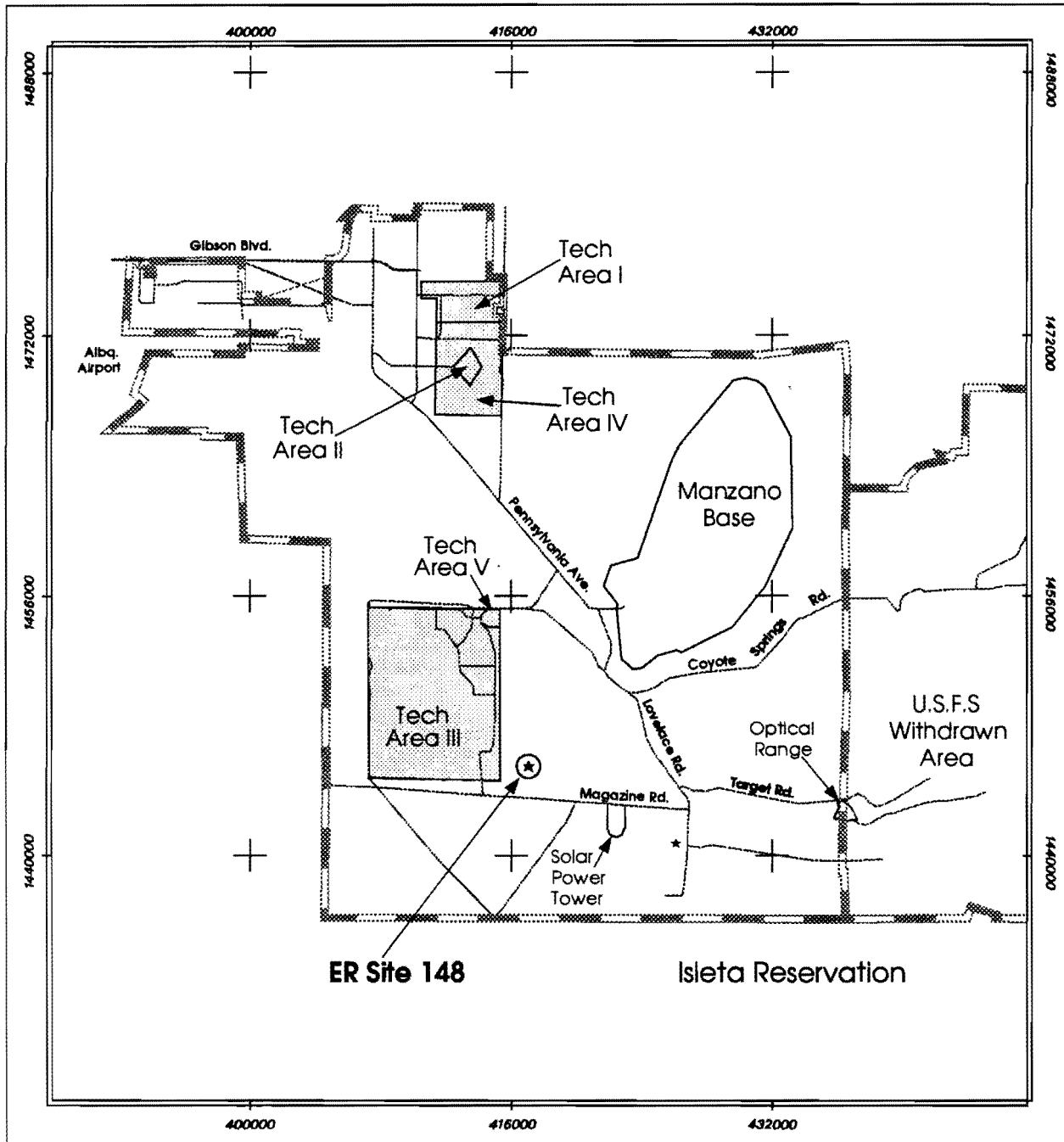
Scale in Feet







Scale in Meters



**FIGURE 2  
Site Map for ER Site 146  
Sandia National Laboratories,  
New Mexico**



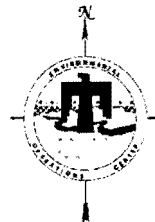
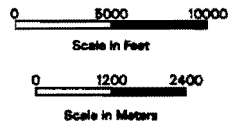
**Legend**

-  ER Site 148
-  Major Roads
-  KAFB Boundary
-  Technical Areas

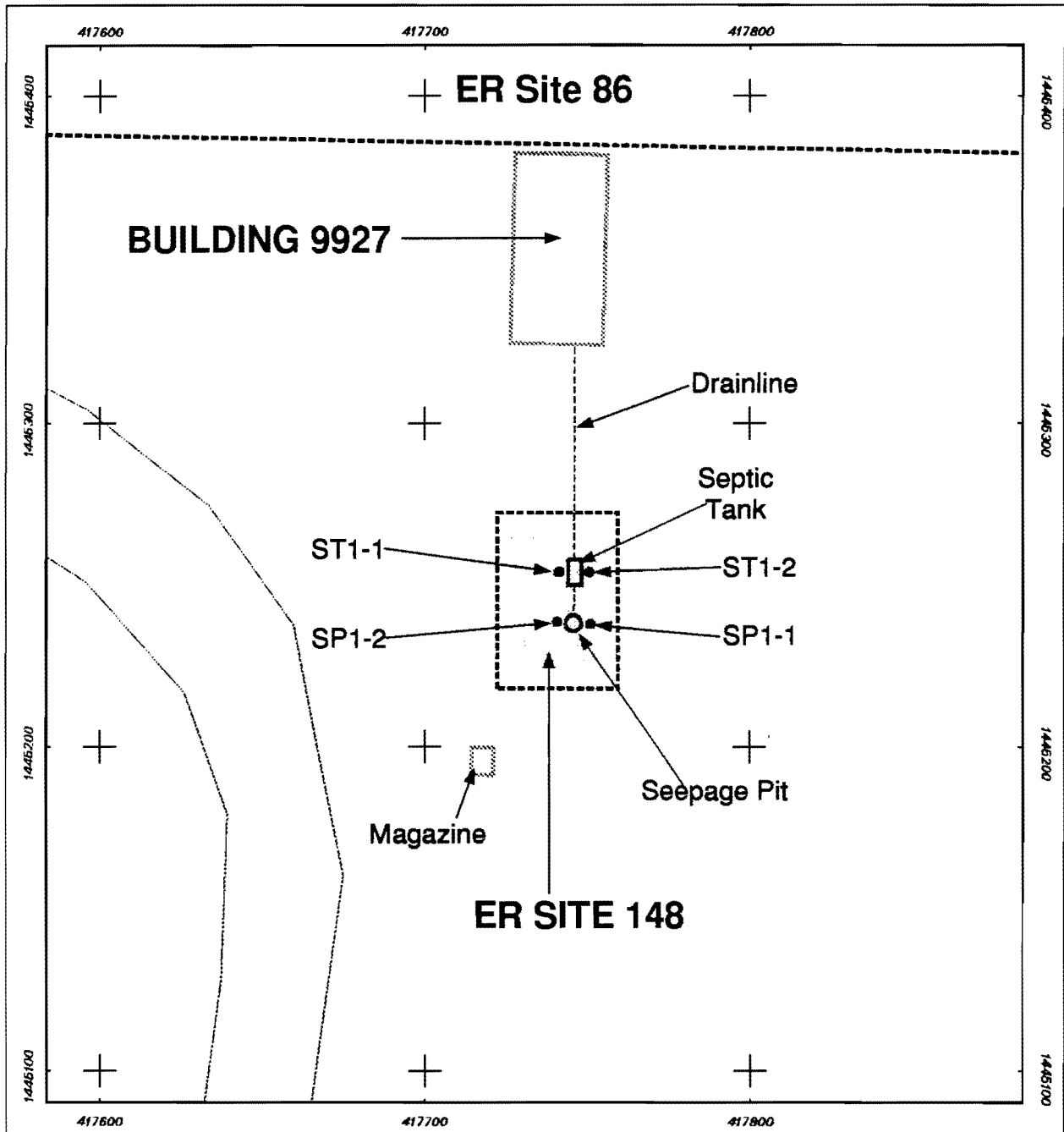
**Sandia National Laboratories, New Mexico  
Environmental Restoration Geographic Information System**

Transverse Mercator Projection, New Mexico State Plane Coordinate System, Central Zone  
1987 North American Horizontal Datum, 1988 North American Vertical Datum

Unclassified



**FIGURE 1  
Location Map for ER Site 148  
Sandia National Laboratories,  
New Mexico**



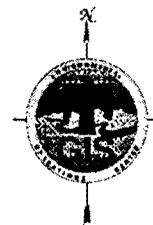
**Legend**

- Boring Location
- KAFB Roads
- ▤ Buildings
- - - Drainline
- ▭ Septic Tank, Seepage Pit
- ▭ ER Site 148

**Sandia National Laboratories, New Mexico  
Environmental Geographic Information System**

*Transverse Mercator Projection, New Mexico State Plane Coordinate System, Central Zone  
1987 North American Horizontal Datum, 1928 North American Vertical Datum*

Unclassified



**FIGURE 2  
Site Map for ER Site 148  
Sandia National Laboratories,  
New Mexico**