



State of New Mexico
ENVIRONMENT DEPARTMENT
 Hazardous & Radioactive Materials Bureau
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GARY E. JOHNSON
 GOVERNOR

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

MARK E. WEIDLER
 SECRETARY

EDGAR T. THORNTON, III
 DEPUTY SECRETARY

March 27, 1998

Michael Zamorski
 Acting Area Manager
 Kirtland Area Office
 U. S. Department of Energy
 P. O. Box 5400
 Albuquerque, NM 87185-5400

C. Paul Robinson, President
 Sandia Corporation
 P. O. Box 5800
 Albuquerque, New Mexico 87185

RE: 2nd Notice of Deficiency: Results of the Technical Area III and V RCRA Facility Investigation

Dear Mr. Zamorski and Mr. Robinson:

The Hazardous and Radioactive Materials Bureau (HRMB) has reviewed your responses (dated 29 October 1997) to the New Mexico Environment Department's (NMED) Notice of Deficiency (NOD) regarding the U. S. Department of Energy (DOE)/Sandia National Laboratories (SNL) submittal *Results of the Technical Areas III and V RCRA Facility Investigation* (dated June 1996). HRMB has found that not all responses to the NOD were adequate; deficiencies that need further attention are listed in Enclosure A. Additionally, other concerns have been raised for some sites. These are listed in Enclosure B.

Environmental restoration (ER) sites at Technical Area V (TA-V) are included in Operable Units (OU's) 1306 and 1307. According to the RCRA Facility Investigation reports for both OU's, none of the ER sites is the source of the ground-water contamination at TA-V. Because DOE/SNL have not identified any source (or sources) that has caused the ground-water contamination at TA-V, and because site characterization is not adequate for some sites, HRMB will not support a No Further Action petition for any ER site in OU 1306 or OU 1307 that has any potential to impact ground-water quality.

Therefore, HRMB requires that further characterization studies be conducted by DOE/SNL to determine the source (or sources) of ground-water contamination at TA-V. The nature, concentration, extent, and rate of migration of contaminants in ground water must be determined. DOE/SNL must submit, for NMED review and approval, a plan to assess the ground-water contamination at TA-V. This plan must include:

HSWA ONL 1306

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A. proposed work to determine the source (sources) of all ground-water contaminants (now known to be solvents and nitrate). This work must include:

i. a proposal to install permanent soil-gas-monitoring wells, and to monitor these wells,

ii. a proposal to conduct a surface soil-gas survey over the entire TA-V area,

B. proposed monitor-well locations and screen depths to fully characterize the extent, nature, concentration, and rate of migration of contaminants in ground water.

C. a schedule for starting and completing the various phases and types of assessment work.

The vertical gradient in the TA-V area is significant. DOE/SNL must complete wells screened deeper into the aquifer to determine the vertical extent of ground-water contamination. Nitrate contamination in TA-V-area ground water must also be addressed to the satisfaction of the NMED Ground-Water Quality Bureau, in accordance with regulations of the New Mexico Water Quality Control Commission.

Cross-sections must be prepared as part of this plan, and using existing information, must show the following items:

A. TCE concentrations,

B. total VOC's,

C. TPH concentrations,

D. lithology of logged boreholes, and

E. relevant structures such as tanks, seepage pits, cisterns, drainfields, and surface impoundments.

The cross-sections must include data representing surface and subsurface soil from all ER sites in the TA-V area (the LWDS sites, TA-V Seepage Pits, PROTO Oil Spill, PROTO UST site, Building 6597 Cistern).

Please submit a written response addressing the deficiencies and concerns listed in Enclosures A and B, within 30 calendar days of receipt of this letter. The ground-water assessment plan must be submitted to NMED within 90 days of receipt of this letter.

Letter to Michael Zamorski, DOE
March 27, 1988
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You may contact William Moats (841-9471) or Susan Hoines (841-9035) of my staff if you have any questions or comments.

Sincerely,



for Benito Garcia
Chief
Hazardous and Radioactive Materials Bureau

Enclosures: A and B

cc: Robert S. (Stu) Dinwiddie, NMED/HRMB
Baird Swanson, NMED/GWQB
Roger Kennett, NMED/DOE OB
Bill McDonald, NMED/DOE OB
Mark Jackson, DOE
Warren Cox, SNL
David Neleigh, EPA
File: HSWA, SNL-OU1306, 98

Enclosure A
List of Deficiencies

Department of Energy/Sandia National Laboratories'
Response to the New Mexico Environment Department
Notice of Deficiency for

*Results of the Technical Areas III and V RCRA Facility
Investigation, June 1996.*

General Deficiencies/Comments

1. DOE/SNL Response to Comment 1

The TA-III/V background study has not been approved by the New Mexico Environment Department (NMED).

Background concentrations have now been approved for that portion of Kirtland Air Force Base (KAFB) which includes OU 1306. These are the background concentrations that should be used by the U. S. Department of Energy (DOE)/Sandia National Laboratories (SNL) to determine whether there has been a release of contaminants to the environment.

See also General Deficiency 7.

2. DOE/SNL Response to Comment 2.

In cases where individual environmental restoration (ER) sites have been proposed for No Further Action (NFA), the complete data set (hard copy form) must be submitted.

While summary tables listing only detected constituents are useful for review purposes, they provide only part of the information needed to fully evaluate a NFA proposal. To complete the data package, additional tables must be submitted listing all of the various constituents that were analyzed for and their method detection limits.

Please note that J-coded data must be treated as detected constituents.

3. DOE/SNL Response to Comment 5.

The Hazardous and Radioactive Materials Bureau (HRMB) does not generally accept TPH analyses for the purpose of site characterization. Although TPH analyses are useful for screening purposes, in most cases, DOE/SNL must also determine whether there has been a release of hazardous constituents at sites that are contaminated with TPH.

Methods 8240 and 8270 are the "standard" methods employed to characterize a site with respect to volatile and semi-volatile organic compounds (VOC's and SVOC's).

4. DOE/SNL Response to Comment 6.
Additional site characterization is needed at some sites before a definitive determination can be made that there has been no impact to ground water. The requested ground-water data and map must be provided to the NMED.

The investigation of ground-water contamination at TA-V will be linked to the source (or sources) of contamination.

5. DOE/SNL Response to Comment 7.
The reference to ER Site 18 is a mistake.

The NMED Underground Storage Tank (UST) Bureau will be consulted on a site-by-site basis to determine whether NMED UST regulations apply. In most cases, DOE/SNL will be required to provide proof (through sampling and analysis) that hazardous constituents have not been released to the environment.

6. DOE/SNL Response to Comment 8.
The new well located west of the former position of KAFB-10 (now abandoned) was drilled at an unacceptable location (too far from LWDS-MW1). DOE/SNL was made aware of this situation prior to the drilling of this new well.

A monitor well must be drilled near the former location of KAFB-10 to evaluate the nature and concentration of contaminants in the ground water.

7. DOE/SNL Response to Comment 9.
Additional site characterization may be required in cases where the concentration of a Constituent of Concern (COC) lies between the 95th UTL (or 95th percentile) and the proposed Subpart S Action Level for that constituent.

Specific Deficiencies/Comments

ER Site 18, TA-III: Concrete Pad

1. DOE/SNL Response to Comment 10.
Based on where samples have been collected, it appears that DOE/SNL has assumed that contaminants were washed off the concrete pad, accumulating nearby onto surface soil. This assumption must be verified by additional sampling. Furthermore, although field-screening methods are useful, laboratory analyses of samples are required to determine whether contamination is present or absent at a site. Therefore, the field-screening

results for samples collected along much of the east, west, and south edges of the concrete pad are inadequate for the purpose of site characterization.

DOE/SNL must collect concrete and additional surface-soil samples at ER Site 18. The samples must be analyzed in a laboratory for VOC's, SVOC's, HE, metals, gross alpha, gross beta, and gamma spectrum. The following requirements must also be met:

- A. The grade of the top surface of the concrete pad must be shown on a map. The grade of the concrete pad must be considered when collecting additional samples.
- B. Samples must be collected at the north, south, east, and west edges of the concrete pad, spaced no more than 100 ft apart.
- C. Samples of concrete must also be collected to determine whether surface contamination is present.
- D. Three surface-soil samples must be collected 30 ft from the edge of the west side of the concrete pad. One of these samples must be located west of where the PCB VCM was conducted.
- E. Three surface-soil samples must be collected 30 ft from the edge of the east side of the concrete pad. One of these samples must be located east of the north-east corner of the pad, where concentrations of Cd exceed background.
- F. One sample must be collected 30 ft from the edge of the north side of the pad.
- G. One sample must be collected 30 ft from the edge of the south side of the pad.

2. DOE/SNL Response to Comment 11.
See General Deficiencies 1 and 7.

3. DOE/SNL Response to Comment 12.
See General Deficiency 1.

4. DOE/SNL Response to Status
See Concern 6, ER Site 18, Enclosure B.

5. See additional concerns for ER Site 18 in Enclosure B.

ER SITE 26, TA-III: BURIAL SITE (WEST OF THE LONG SLED TRACK)

1. DOE/SNL Response to First Bullet of Comment 14
[located on page 8, fourth paragraph, first sentence]
The differences between the 1992 and 1994 surveys must be identified before the 1992 survey can be declared invalid. At a minimum, DOE/SNL must compare the grid spacing and data acquisition technique of the two surveys. At this time, NMED has no assurance that either geophysical survey was adequate. DOE/SNL did not demonstrate that a fine enough grid was used to prevent spatial aliasing of one or two 55-gallon drums buried 5 ft below the ground surface. Models of the magnetic and electromagnetic signature (amplitude and areal extent) of one and two 55-gallon drums must be provided. In addition, the geophysical data need to be displayed in such a way that an anomaly representing a 55-gallon-drum-sized object is readily discernable. The geophysical survey results presented in the RFI report were plotted on maps at an inappropriate scale.

Field verification is mentioned very little in the RFI report or in the Notice Of Deficiency (NOD)-response. DOE/SNL must examine the areas exhibiting magnetic and electromagnetic anomalies, determine if hazardous constituents are present, and report the results to NMED. If the anomalies are caused by subsurface objects, DOE/SNL must excavate them.

2. DOE/SNL Response to First Bullet of Comment 14
[located on page 8, fourth paragraph, third and last sentence]
This is the same information that was in the original RFI report. This will not change NMED's position expressed in the July 31, 1997 NOD.

3. DOE/SNL Response to Second Bullet of Comment 14
[located on page 8, last paragraph]
See NMED comments under Specific Deficiency 1 regarding field verification.

A. DOE/SNL Response to Second Bullet of Comment 14
[located on page 9, first paragraph, first sentence]
See NMED comments under Specific Deficiency 1 regarding geophysical surveys.

B. DOE/SNL Response to Second Bullet of Comment 14
[located on page 9, first paragraph, second and third sentences]
See comments under Specific Deficiency 2.

General comment: Neither Site 26 nor Site 83 have been completely characterized. In addition, NMED considers a landfill to be sufficiently different from the Long Sled Track to warrant a

separate SWMU designation. Finally, NMED cannot grant NFA status to a landfill based solely on a geophysical survey.

4. DOE/SNL Response to Third Bullet of Comment 14
[located on page 9, third paragraph, second sentence]
See comments under Specific Deficiencies 2 and 3.

5. DOE/SNL Response to Status
[located on page 9, fifth paragraph, first sentence]
See comments under Specific Deficiencies 2 and 3.

NMED retains its original position on the status of Site 26.

ER Site 31, TA-III: Electrical Transformer Oil Spill

1. DOE/SNL Response to Comment 16.
The analytical results for PCB's must be provided, even if all sample results were below their Method Detection Limits (MDL). For each sample, the MDL's for each PCB compound must be provided. All QA/QC results must also be submitted.

Sample locations must be shown on a map. DOE/SNL must differentiate between samples analyzed in the field and those analyzed in the laboratory.

2. DOE/SNL Response to Status
HRMB did not state that it would support an NFA petition for ER Site 31. Additional information is required.

ER Site 34, TA-III: Centrifuge Oil Spill

1. DOE/SNL Response to Status
HRMB did not state that it would support an NFA petition for ER Site 34. Additional information is required (see the comment below).

As mentioned previously, HRMB does not routinely accept TPH results for the purpose of site characterization. However, in this case, HRMB will not insist that samples be analyzed for hazardous constituents (SVOC's and VOC's).

2. See additional concern for ER Site 34 in Enclosure B.

ER Site 35, TA-III: Vibration Facility Oil Spill

1. DOE/SNL Response to Comment 19
DOE/SNL must prove that hazardous constituents were not released to the environment at ER Site 35. Soil samples must be collected and analyzed in a laboratory for VOC's and SVOC's. Surface and subsurface soil must be sampled.

By agreement, surface soil in the KAFB area is considered to range in depth from 0-6 inches.

If hazardous constituents are colocated with the TPH contamination, it is doubtful that the horizontal and vertical extent of contamination has been adequately characterized.

2. See additional concern for ER Site 35 in Enclosure B.

ER Site 36, TA-V: Hermes Oil Spill

DOE/SNL Response to Status

Additional site characterization may be necessary. See additional concerns for ER Site 36 in Enclosure B.

ER Site 37, TA-V: Proto Oil Spill

DOE/SNL Response to Status

Additional site characterization may be necessary. See additional concerns for ER Site 37 in Enclosure B.

ER Site 78, TA-III: Gas Cylinder Disposal Pit

1. DOE/SNL Response to Comment 22

The maximum chromium value reported in the RFI report (Table 11.5) is 39.7 mg/kg, not 26.2 mg/kg). Additional site characterization may be needed because a minimum of two "clean" samples was not attained at the end of drilling. Pending review of the information that is requested below, additional site characterization may or may not be required.

In addition to chromium, maximum concentrations of verification soil samples exceed the approved background levels for As, Pb, and Ag. Because only limited data were provided in the RFI report, HRMB could not determine whether other metals also exceed approved background levels.

2. DOE/SNL Response to Status

HRMB will not support a NFA petition at this time, as further site characterization may be required. At minimum, because contaminated soil remains buried at the site, a risk assessment must be done after the site is fully characterized.

3. See additional concerns for ER Site 78 in Enclosure B.

ER Site 83, TA-III: Long Sled Track

1. DOE/SNL Response to Comment 23

[located on page 15, paragraph two]

DOE/SNL shall submit to NMED the estimated dose to site workers

that may be exposed to the "large soil area". DOE/SNL shall also submit sampling data of the "large soil area" to support DOE/SNL's calculations of dose to site workers. NMED will accept the DOE/SNL response when DOE/SNL have demonstrated to NMED's satisfaction that the dose to site workers does not endanger human health.

DOE/SNL Response to Comment 23

[located on page 15, paragraph two]

This response promises that a full site investigation will be conducted once the site is decommissioned. DOE/SNL shall also remove any hazardous constituents or clean up hazardous constituents to risk-based concentrations, once the site is decommissioned.

2. DOE/SNL Response to Comment 24

[located on page 15, paragraph four]

DOE/SNL did not address the NOD comment completely. DOE/SNL shall conduct a complete investigation within two years after site decommissioning.

ER Site 84, TA-III: Gun Facilities

See additional concerns listed in Enclosure B for ER Site 84.

ER Site 100, TA-III: Building 6620 Drain/Sump

1. DOE/SNL Response to Comment 27

The tile must be removed to determine conclusively whether a floor drain was present. Once the floor tile is removed, HRMB staff will inspect the building.

2. DOE/SNL Response to Status

See Specific Deficiency 1.

3. See additional concerns for ER Site 100 in Enclosure B.

ER Site 107, TA-III: Explosives Test Area

1. DOE/SNL Response to Comment 28

[located on page 17, paragraph six]

The 10 samples plus one duplicate sample collected for this investigation were composite samples. Composite samples are unacceptable for the purposes of site characterization.

Therefore, statistical analyses of composite samples are not acceptable in this case.

2. DOE/SNL Response to Comment 28

[located on page 17, paragraph six, last sentence]

NMED has not approved TA-III/V specific background UTLs and 95th

percentiles. DOE/SNL must compare TA-III/V investigation data to site-wide background UTLs/95th percentiles. DOE/SNL must compare analytical data from discrete samples to the site-wide background UTLs/95th percentiles.

3. DOE/SNL Response to Comment 28

[located on page 18, first paragraph, first sentence]

Are the Phase II samples composite samples? If so, they are unacceptable to the NMED. DOE/SNL shall submit analytical results of all discrete samples (hard copy form), submit all QA/QC data, a sampling map of all discrete sample locations, and shall compare all discrete sample concentrations to the site-wide background UTLs/95th percentiles. If DOE/SNL has not collected any discrete samples, DOE/SNL shall do so.

4. DOE/SNL Response to Comment 28

[located on page 18, second paragraph]

A NFA decision is not appropriate.

ER Site 111, TA-III: Building 6715 Sump/Drain

1. DOE/SNL Response to Comment 29

Because the geologist did not log two of the three boreholes, there is no documented proof that strata encountered in all three boreholes were "almost identical". In most situations, all boreholes should be logged.

2. See additional concerns for ER Site 111 in Enclosure B.

ER Site 196, TA-V: Building 6597 Cistern

1. DOE/SNL Response to Comment 31

The presence of "minor" VOC concentrations in both soil samples (on-site laboratory) and soil-gas samples indicates that hazardous constituents were released to the environment. The extent of contamination has not been determined. Contamination at the site is a potential threat to ground-water.

Contaminants detected at the site include TPH, TCE, 1,1,1-TCA, benzene, toluene, methylene chloride, copper, lead, and zinc. This site may be the source or one of the sources of the TCE contamination seen in ground-water at TA-V.

Additional site characterization, including the collection and analysis of soil samples from deep boreholes, is required.

2. DOE/SNL Response to Comment 32

This response relies on the assumption that only small quantities of waste transformer oil were discharged into the cistern (5 gal

per week, page 21-1, paragraph 1). However, HRMB questions why such a large cistern (a seepage pit 20-ft deep by 25-ft diameter) and associated piping was constructed to discharge such small quantities of waste oil.

Additionally, as mentioned in the above comment, "minor" VOC concentrations in both soil samples and soil-gas samples were detected by the on-site laboratory. DOE/SNL cannot dismiss these on-site laboratory results simply because they are less favorable than the off-site results.

3. See additional concern for ER Site 196 in Enclosure B.

ER Site 240, TA-II; Short Sled Track

1. DOE/SNL Response to Comment 33

[located on page 21, second paragraph]

DOE/SNL conducted field screening on composite samples. DOE/SNL's response did not address the NMED's position on field screening. NMED retains its position on field screening. In addition, field screening should be conducted on discrete samples.

2. See additional concerns for ER Site 240 in Enclosure B.

ER Site 241, TA-111: Storage Yard

1. DOE/SNL Response to Comment 34

The site is contaminated with metals (Sb, Be, Cd, Cu, Pb, Zn) and PCB's. Additional site characterization is necessary.

DOE/SNL must provide the complete data set (hard copy form), including the analytical results for all QA/QC samples, and all radiochemical results.

If contaminants are left at the site, then a risk assessment will be required after the site is fully characterized.

2. See additional concerns for ER Site 241 in Enclosure B.

Enclosure B Additional Concerns

Department of Energy/Sandia National Laboratories'
Response to the New Mexico Environment Department
Notice of Deficiency for

*Results of the Technical Areas III and V RCRA Facility
Investigation, June 1996.*

ER Site 18, TA-III: Concrete Pad

1. Page 3-5, Section 3.2.2 -- How large was the area that was contaminated with Co-60? DOE/SNL must show this area on a map at an appropriate scale. The area, represented as a point on Figure 3-3, is not adequately shown on this map.

Following removal of the Co-60 contaminated media, where was the waste disposed of?

2. Page 3-4, Figure 3-2 -- The scale of the sample-location map is inadequate. Additional maps must be provided for sections of the concrete pads where sample locations are concentrated.

3. Page 3-7, Figure 3-3 -- Radiological area sources are shown overlapping the concrete pad. Were sections of the concrete pad removed? Was soil adjacent to the pad removed? If so, what was the disposition of these waste streams?

Areas that were contaminated with radionuclides need to be addressed in more detail. Sample locations need to be shown on maps. Areas contaminated with depleted uranium, Co-60, and any other radionuclides should be differentiated from one another.

4. Why was the concrete pad constructed? Explain why it was necessary to construct such a large pad.

5. Page 3-3, Section 3.1.3, 3rd paragraph -- Provide the results for the two samples analyzed for isotopic uranium. What do the results indicate?

6. ER Site 18 is an active site. HRMB will not support a NFA petition for an active site.

ER Site 34, TA-III: Centrifuge Oil Spill

Sample locations must be shown on a map drawn to scale.

ER Site 35, TA-III: Vibration Facility Oil Spill

Results for samples analyzed in the laboratory for PCB's must be provided.

ER Site 36, TA-V: Hermes Oil Spill

1. Show on a map, the locations of the oil spills, the five 35,000 gal underground storage tanks, piping associated with the underground storage tanks, and sample locations.

2. Provide the complete data set (hard copy form), including the analytical results for all QA/QC samples.

3. DOE/SNL must submit a copy of the closure letter issued by the NMED/UST Bureau.

ER Site 37, TA-V: Proto Oil Spill

1. DOE/SNL must submit a copy of the closure letter issued by the NMED/UST Bureau for ER Site 155.

2. Analytical results for the confirmation samples collected beneath the PROTO UST's must be provided. DOE/SNL must demonstrate that hazardous constituents were not released to the environment. This demonstration must include soil samples collected at depths that are below the bottoms of the UST's.

3. Page 9-3, Figure 9-2 -- A new map must be provided which differentiates between samples analyzed by field methods and those analyzed in the laboratory.

4. Provide the complete data set (hard copy form, not in electronic format), including the analytical results for all QA/QC samples.

5. Show on a map the locations of the oil spills, the seven 25,000 gal underground storage tanks, piping associated with the underground storage tanks, and sample locations.

ER Site 78, TA-III: Gas Cylinder Disposal Pit

1. Page 11-5, Section 11.3.3 -- DOE/SNL must submit a map showing the results of the geophysical survey conducted during Phase 1 (Preliminary Work).

2. DOE/SNL must provide the final geophysical survey(s) of the excavation that indicated that no other waste remained buried at the site.

3. DOE/SNL must provide all data associated with the verification sampling, including analytical results for all QA/QC samples.

4. There is no indication whether verification samples were collected along the sides of the VCM excavation. DOE/SNL must state whether such samples were collected.

5. DOE/SNL must provide a map showing sampling locations which were used to delineate the extent of thorium-contaminated surface soil. DOE/SNL must prove that all thorium-contaminated surface soil has been removed and that such soil does not extend beyond the edges of the VCM excavation.

ER Site 84, TA-III: Gun Facilities

1. DOE/SNL did not demonstrate that a fine enough grid was used to prevent spatial aliasing of 3" x 3" fragments buried 1.5 ft below the ground surface. A model of the electromagnetic signature (amplitude and areal extent) of a 3" square fragment must be provided. In addition, the geophysical data need to be displayed in such a way that the anomalies are easily discernable. The geophysical survey results presented in the RFI report were plotted on maps at an inappropriate scale.

2. Page 13-7/8 of the TA III/V RFI Report, third paragraph, last sentence: **It appears possible that some anomalies extend to the southeast and were not fully covered by the additional survey.** The geophysical survey needs to be extended to the southeast.

3. NMED understands that a full investigation will be completed once the site is decommissioned. After decommissioning, NMED expects field verification of all geophysical anomalies encountered at the site.

ER Site 100, TA-III: Building 6620 Drain/Sump

1. DOE/SNL must revise Figures 14-1 and 14-2 such that they also show the location of the ditch that is situated somewhere north of Building 6620. Furthermore, on these revised figures, DOE/SNL must clarify exactly where the exploratory trench was placed.

2. DOE/SNL must provide justification as to why the exploratory trench was limited to a depth of only 3 ft.

3. The presence of utility lines, fences, and soil berms is not considered to be a reasonable excuse for the purpose of abandoning site-characterization efforts.

ER Site 111, TA-III: Building 6715 Sump/Drain

1. DOE/SNL must provide the complete data set (hard copy form), including the analytical results for all QA/QC samples.
2. DOE/SNL must revise Figures 18-1 and 18-2 such that they show the locations of the steel tank, PVC discharge pipe, the drain pit, and sample locations.
3. What was the estimated total discharge (by volume) over the life of the unit?
4. Analytical results in Table 18.1 indicate that soil at ER Site 111 is contaminated with silver in excess of the approved background level. HRMB will not support a NFA petition at this time, as further site characterization may be required. Additionally, because contaminated soil remains at the site, a risk assessment must be done after the site is fully characterized.
5. Page 18-4, Section 18.2.1 -- DOE/SNL must submit a map showing the location of the 1.5 acre excavation site located 500 ft west of ER Site 111. The site must be investigated as a potential new solid waste management unit. DOE/SNL must provide a sampling and analysis plan to the NMED for review and approval prior to carrying out this investigation.

ER Site 196, TA-V: Building 6597 Cistern

DOE/SNL must provide the complete data set (hard copy form), including the analytical results for all QA/QC samples.

ER Site 240, TA-III: Short Sled Track

1. DOE/SNL must submit to NMED the complete data set (hard copy form) for all discrete samples for all analytes. DOE/SNL must also submit to NMED the corresponding QA/QC data set.
2. DOE/SNL compared sample results to TA III/V - specific background UTLs/95th percentiles. NMED has not approved TA III/V - specific background UTLs/95th percentiles. DOE/SNL must compare results from discrete samples to Site-Wide UTLs/95th percentiles.

ER Site 241, TA-III: Storage Yard

1. The number of samples analyzed in the laboratory are inadequate for such a large site. Additional surface-soil samples must be collected and analyzed for all of the constituents of concern.

2. The sample-location map (Figure 23-3) is not adequate. DOE/SNL must submit a revised sample-location map that is generated using a scale such that individual sample locations can be identified.

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