



State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
 Hazardous & Radioactive Materials Bureau  
 2044 Galisteo  
 P.O. Box 26110  
 Santa Fe, New Mexico 87502  
 (505) 827-1557  
 Fax (505) 827-1544



GARY E. JOHNSON  
 GOVERNOR

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

MARK E. WEIDLER  
 SECRETARY

EDGAR T. THORNTON, III  
 DEPUTY SECRETARY

March 31, 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  
 M.S. 0101, Org. 00001  
 P. O. Box 5800  
 Albuquerque, NM 87185

**RE: NOTICE OF DEFICIENCY: OU 1333 RFI Work Plan**

Dear Mr. Zamorski and Mr. Robinson:

The Hazardous and Radioactive Materials Bureau (HRMB) has reviewed your responses (undated, received November 21, 1997) to NMED's Request for Supplemental Information (RSI) regarding the DOE/SNL submittal Sandia National Laboratories RCRA Facility Investigation Work Plan for Operable Unit 1333, Canyons Test Area. HRMB has found that not all responses to the RSI are satisfactory.

Deficiencies remain and are noted in Enclosure A. Please respond to these deficiencies within 30 days of receipt of this letter.

Please contact William Moats of my staff at 841-9471 if you have any questions or comments.

Sincerely,

Benito Garcia  
 Chief

Hazardous and Radioactive Materials Bureau

Enclosure

cc: Robert S. (Stu) Dinwiddie, NMED/HRMB  
 Roger Kennett, NMED/DOE OB  
 Mark Jackson, DOE  
 Dick Fate, SNL  
 David Neleigh, EPA  
 File: HSWA, SNL-OU 1333, 98



**Enclosure A**  
**Notice of Deficiency**

Department of Energy (DOE)/Sandia National Laboratories (SNL)

*Sandia National Laboratories RCRA Facility Investigation  
Work Plan for Operable Unit 1333, Canyons Test Area*

**General Deficiencies/Comments**

**1. Response 2a** -- See letter from Robert (Stu) Dinwiddie (HRMB/NMED) to Mike Zamorski (DOE), dated January 5, 1998. HRMB will not require that all references in the OU 1333 RFI Work Plan be revised to meet the standards in this letter. Instead, HRMB insists that references in future documents should meet these standards.

**Response 2b** -- NMED reserves the right to require expedited characterization/remediation at any site where conditions are such that they represent (or potentially represent) an immediate and serious threat to human health and the environment.

**2. Response 5** -- HRMB is aware that the new monitor well at the "narrows" location has been installed. Ground water at the "narrows" location must be monitored for nitrate, radionuclides, and hazardous constituents (VOC's, SVOC's, metals, and HE). Low flow pumps can not be used to collect ground-water samples at this location.

Sampling is to be done once every 3 months. After three rounds of sampling, and if warranted, DOE/SNL may request that the list of analytes be reduced.

**3. Response 7** -- When they become available, SNL/DOE must submit the results of the soil sampling that is to be conducted after demolition of the Bomb Burner Unit.

**4. Response 8** -- HRMB must know whether ground water has been contaminated due to testing activities at ER Site 81. At least one ground-water monitor well must be installed approximately 500 ft north of ER Site 81.

**5. Response 9** -- See General Comment 1 above concerning Response 2b.

## Specific Deficiencies/Comments

### ER Site 13, Oil Surface Impoundment

Response 1 -- The response is not adequate, and the proposed new language is identical to that in the RFI Work Plan (Page 5-140, Section 5.4.1.3, last paragraph). The current chemistry of waste water in the tanks may not represent a worst-case scenario for metals and VOC's.

SNL/DOE must either revise the language or remove it.

### ER Site 65B, Lurance Canyon Explosive Test Site, Primary Detonation Area

Response 1 -- HRMB prefers the use of test pits to differentiate between cut and fill areas. Except for any fill areas that have depths greater than 12", the proposed sampling depths of 0-6" and 6-12" are acceptable.

### ER Site 65D, Lurance Canyon Explosive Test Site, Near Field Dispersion Area

Response 1 -- HRMB prefers the use of test pits to differentiate between cut and fill areas. Except for any fill areas that have depths greater than 12", the proposed sampling depths of 0-6" and 6-12" are acceptable.

### ER Site 81B, New Aerial Cable Site, Pad

Response 3 -- Four sediment samples must be collected at a depth of 6-12" from the main arroyo channel of Sol se Mete Canyon. The samples must be analyzed for VOC's. The four samples must be collected at the locations shown as blue squares on Figure 5-59, page 5-181, of the RFI Work Plan.

### ER Site 94A, Lurance Canyon Burn Site, Above-Ground Tanks

Response 1 -- SNL must submit the analytical data for the soil samples collected in May 1990.