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CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

EDGAR T. THORNTON, III
 DEPUTY SECRETARY

HSWA SNL 1334

March 31, 1998

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

RE: NOTICE OF DEFICIENCY: OU 1334 RFI Work Plan

Dear Mr. Zamorski:

The Hazardous and Radioactive Materials Bureau (HRMB) has reviewed your responses (undated, received December 1, 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 1334, Central Coyote Test Area. HRMB has found that not all responses to the RSI are satisfactory.

Deficiencies noted are enclosed. Please respond to these deficiencies within 30 days of receipt of this letter.

You may 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 Miller, SNL
 David Neleigh, EPA
 File: HSWA, SNL-OU 1334, 98

SNL 1097



Notice of Deficiency

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

Sandia National Laboratories RCRA Facility Investigation
Work Plan for Operable Unit 1334, Central Coyote Test Area

General Deficiencies/Comments

1. *Introduction* -- the Request for Supplemental Information (RSI) (dated August 26, 1997) for the OU 1334 RCRA Facility Investigation (RFI) Work Plan was issued by the New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau, not the NMED Department of Energy (DOE) Oversight Bureau (OB). HRMB is the regulatory authority.
2. *Response 2* -- The scaled maps should be submitted to the HRMB. DOE/SNL may submit the individual site maps with No Further Action (NFA) proposals or with an RFI report.
3. *Response 3* -- DOE/SNL must specify which sites will be, and which sites will not be sampled for *background* gross alpha, gross beta, and gamma spectrum. Sufficient samples of these radiological parameters must be collected to allow a reasonably accurate range of background levels to be established for "order of magnitude screening".
4. *Response 4* -- DOE/SNL are encouraged to seek recommendations from the DOE OB; however, the DOE OB is not the regulatory authority. HRMB may or may not accept any given agreement between the DOE OB and DOE/SNL.
5. *Response 5* -- HRMB will decide on a case-by-case basis whether ground water has been threatened by site testing and/or disposal activities, and whether ground water must be investigated.

Specific Deficiencies/Comments

ER Site 9, Burial Site/Open Dump

1. *Response 1* -- HRMB will not support NFA petitions for sites that have not been fully characterized.
2. *Response 3* -- Background concentrations can only be approved by HRMB.

3. Response 6 -- The waste types found in Mound 2 must be documented by DOE/SNL. SNL must also document the disposition of the debris removed from Mound 2.

4. Response 9 -- Sediment samples from the arroyo channel must also be analyzed for gamma spectrum.

ER Site 11, Explosives Burial Mounds

1. Response 1 -- See Specific Comment 1, ER Site 9.

2. Response 2 -- See Specific Comment 2, ER Site 9.

3. Response 3 -- Samples collected in the bottoms of the depressions must be analyzed for VOC's, gross alpha, gross beta, and gamma spectrum.

ER Site 57A, Workman Site: Firing Area

1. Response 3 -- Information showing that the point source was removed, and the area sources are naturally occurring geologic materials must be presented in the NFA proposal (or RFI report) for the site.

2. Response 4 -- See Specific Comment 2, ER Site 9.

3. Response 7 -- Soil samples must be collected from beneath the floor drain.

4. Response 9 -- The response included the sentence "VOC samples were collected of each mound's soil and the oil (emphasis added) beneath each mound".

HRMB assumes that the word "oil" is a typo; if not, DOE/SNL must characterize the oil-contaminated soil at each mound location.

5. Response 10 -- The pipe should be excavated to prove that it is nothing more than an abandoned electrical conduit.

ER Site 57B, Workman Site: Target Area

1. Response 1 -- See Specific Comment 1, ER Site 9.

2. Response 2 -- Information showing that the four area sources are naturally occurring geologic materials must be presented in the NFA proposal (or RFI report) for the site.

3. Response 3 -- See Specific Comment 2, ER Site 9.

4. Response 4 -- Soil samples must be collected from beneath the bottom of the pits and analyzed for VOC's and SVOC's.

5. Response 5 -- See Specific Deficiency 4 above.

6. Response 6 -- The nonhazardous solid waste should be removed and disposed of in a RCRA Subtitle D landfill. If this is not done, HRMB will ask the NMED Solid Waste Bureau to conduct a compliance inspection of the debris mound. If the debris mound is found to be in violation of the New Mexico Solid Waste Management Regulations, then HRMB will not support a NFA proposal for ER Site 57B.

ER Site 61A, Schoolhouse Mesa Test Site: Blast Area

1. Response 1 -- See Specific Comment 1, ER Site 9.

2. Response 2 -- Information concerning the radiological point and area sources, and remediation, must be presented in the NFA proposal (or RFI report) for the site.

3. Response 3 -- See Specific Comment 2, ER Site 9.

4. Response 9 -- Surface soil in the area northeast of the concrete blocks must be sampled and analyzed for HE.

ER Site 61C, Schoolhouse Mesa Test Site: Schoolhouse Building

1. Response 3 -- See Specific Comment 1, ER Site 9.

2. Response 4 -- The "J-coded" concentrations for V and Cd, and the concentration for nitrate (Table 5-11) exceed approved background levels for these constituents in ground water. Additional data are needed for HRMB review (see Specific Deficiency 3 below).

3. Response 6 -- DOE/SNL must follow the sampling protocol recently established by HRMB for sampling septic systems (see letter from Stu Dinwiddie, NMED, to Mike Zamorski, DOE, dated January 29, 1998).

DOE/SNL must compile all available ground-water quality data for the Schoolhouse Well and submit it to HRMB.

Monitor wells may be needed at the Schoolhouse site to investigate potential ground-water contamination.

4. Response 5 (2nd response 5) -- See Specific Comment 1, ER Site 9 and General Comment 5.

5. Response 6 (2nd response 6) -- See Specific Comment 1, ER Site 9.

6. Response 8 (2nd response 8) -- See Specific Comment 2, ER Site 9.

ER Site 68, Old Burn Site

1. Response 4 -- See Specific Comment 1, ER Site 9.

2. Response 5 -- Information showing that the point sources have been remediated must be presented in the NFA proposal for the site.

3. Response 6 -- See Specific Comment 2, ER Site 9.

4. Response 8 -- The soil samples must be collected and analyzed for VOC's, SVOC's, metals, gross alpha, gross beta, and gamma spectrum.

5. Response 11 -- See Specific Comment 1, ER Site 9.

6. Response 12 -- See Specific Deficiency 4 above.

7. Response 14 -- SNL must investigate the debris mound. This investigation does not have to be done as part of ER Site 68; however, DOE/SNL must submit a schedule showing when the investigation will begin and the anticipated completion date.