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RON CURRY
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 14, 2004

Patty Wagner
Manager
Sandia Site Office/NNSA
U.S. Department of Energy
P.O. Box 5400, MS 0184
Albuquerque, NM 87185-5400

Peter B. Davies
Director, Geoscience and Environment
Center (6100)
Sandia National Laboratories
P.O. Box 5800, MS 0701
Albuquerque, NM 87185-0701

RE: THIRD NOTICE OF DEFICIENCY: RESPONSE TO COMMENTS ON JULY 12, 2004 NMED NOTICE OF DEFICIENCY, POST-CLOSURE CARE PLAN FOR THE CORRECTIVE ACTION MANAGEMENT UNIT, TECHNICAL AREA 3, SANDIA NATIONAL LABORATORIES/NEW MEXICO ENVIRONMENTAL RESTORATION PROJECT, MARCH 2004
SANDIA NATIONAL LABORATORIES NM5890110518
HWB-SNL-03-025

Dear Ms. Wagner and Mr. Davies:

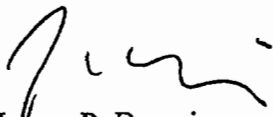
The New Mexico Environment Department (NMED) has reviewed the subject document submitted by the U.S. Department of Energy (DOE)/Sandia National Laboratories (SNL) on August 31, 2004. The responses are not adequate. The enclosed Notice of Deficiency (NOD) contains comments that must be addressed. DOE/SNL must make the changes discussed above and incorporate them into a final version of the PCCP. All other NMED comments from July 12, 2004 have been satisfactorily addressed. DOE/SNL must submit the requested information within sixty (60) calendar days from the date of receipt of this letter.



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If you have any questions, please contact Mr. William Moats of my staff at (505) 284-5086.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc: W. Moats, NMED HWB
D. Strasser, NMED HWB
C. Amindyas, NMED HWB
C. Voorhees, NMED DOE OB
~~W. Moats, SNL, MS 1087~~
J. Estrada, DOE NNSA/SSO
L. King, EPA-Region 6 (6PD-N)

File: Reading and SNL, CAMU, 2004

SEP 15 2004

THIRD NOTICE OF DEFICIENCY

U.S. Department of Energy (DOE) / Sandia National Laboratories (SNL)
Response to July 12, 2004 NMED Notice of Deficiency for
Post-Closure Care Plan (PCCP) for the Corrective Action Management Unit (CAMU)
Technical Area 3
March 2004

1. Response to Comment #7. This NMED comment required that Figure 2-6, Detail 10, Plan of Leachate Collection and Storage Area, be revised to reflect that the leachate collection tank and appurtenances are no longer in use and that it should be shown as a less-than-90-day drum storage area with the appropriate controls.

In response to this comment, DOE/SNL provided an updated Figure 2-6 to reflect all changes occurring since CAMU closure. These updates included deleting Detail 10, as requested, as well as deleting Details 1 and 3, relating to the now-removed decontamination pad, and Detail 11, relating to the now-removed leachate collection pad.

After deleting these particulars, the remaining detail section numbers were changed to detail sections #1 through #7. In doing so, these detail section numbers no longer match the detail sections that they refer to in Figure 2-4, which is the CAMU Containment Cell Site Plan.

DOE/SNL must correct this discrepancy in detail section numbers. In addition, DOE/SNL must add a detail section of the less-than-90-day area showing a cross-section of the secondary containment pallets on the 3-inch-deep gravel base course.

2. Response to Comment #9. This NMED comment required that Section 2.2 of the Waste Analysis Plan, *Description of Hazardous Remediation Waste*, provide a description of the hazardous waste constituents that potentially could be detected in leachate.

In response to this comment, DOE/SNL indicated that laboratory analysis of the leachate would be performed to evaluate compliance with City of Albuquerque sanitary sewer discharge limits; a list of constituents to be sampled for prior to said discharge to the sanitary sewer was provided. DOE/SNL further indicated that a complete list of potential constituents is found in Table 3-1 of the existing CAMU permit (SNL/NM, September 1997).

DOE/SNL is herein again requested to provide a description in the PCCP of the hazardous waste constituents that potentially may be found in the leachate, not what will be sampled for prior to discharge into the sanitary sewer system. In addition, NMED expects RCRA waste-contaminated leachate to be managed as F039 listed waste, which should be sent to an off-

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site RCRA Subtitle C facility for treatment and disposal, as applicable. The NMED is concerned that leachate sampled for the purpose of discharge into the sanitary sewer system will not be fully characterized to determine if the leachate should be managed as hazardous waste from "cradle to grave". DOE/SNL are reminded here that the CAMU permit currently requires leachate from the containment cell to be disposed of at an off-site RCRA Subtitle C facility.