



IRM-RMMSO Official Correspondence Form

Name:	U1101673													
Title:	Second Notice of Disapproval Investigation Report Lower Sandia Canyon Aggregate Area Los Alamos National Laboratory EPA ID #NM0890010515 HWB-LANL-11-019													
Date Received:	9/9/2011													
Addressee Name:	Michael J. Graham, ADEP													
Originator:	John E. Kieling, NMED, Santa Fe, New Mexico													
Action Item Description:	The Permittees must address all comments and submit a response by 9/19/2011													
Action Due Date:	9/19/2011													
Responsible for Action:	Search <u>Graham, Michael J</u> 													
Responsible Office:	PADCAP													
Distribution:	<table><tr><td>Michael Graham</td><td>Deborah K. Woitte</td></tr><tr><td>Charles McMillan</td><td>William Alexander</td></tr><tr><td>Isaac RichardsonIII</td><td>Phoebe K. Suina</td></tr><tr><td>Richard Marquez</td><td>Anthony R. Grieggs</td></tr><tr><td>Paul Henry</td><td>Tina Sandoval</td></tr><tr><td>James Cantwell</td><td>Scotty Jones</td></tr></table> 		Michael Graham	Deborah K. Woitte	Charles McMillan	William Alexander	Isaac RichardsonIII	Phoebe K. Suina	Richard Marquez	Anthony R. Grieggs	Paul Henry	Tina Sandoval	James Cantwell	Scotty Jones
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DAVE MARTIN
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BUTCH TONGATE
Acting Deputy Secretary

EP2011-5422

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 8, 2011

George J. Rael, Assistant Manager
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Department of Energy/National
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Los Alamos, NM 87544

Michael J. Graham, Associate Director
Environmental Programs
Los Alamos National Security, LLC
P.O. Box 1663, MS M991
Los Alamos, NM 87545

**RE: SECOND NOTICE OF DISAPPROVAL
INVESTIGATION REPORT
LOWER SANDIA CANYON AGGREGATE AREA
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-11-019**

Dear Messrs. Rael and Graham:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and the Los Alamos National Security, LLC (LANS) (collectively, the Permittees) the *Investigation Report for Lower Sandia Canyon Aggregate Area, Revision 1* (Report) dated August 2011 and referenced by LA-UR-11-4795 and EP2011-0261 and response to the Notice of Disapproval (NOD). NMED hereby issues this second NOD with the following comments. The comment numbers correspond to the original NOD comments.

3. Section 6.4.1.4, Site Contamination, Soil and Rock Sampling, page 32:

The NOD response states that the results of geophysical survey did not identify any landfill boundaries or buried waste at Solid Waste Management Unit (SWMU) 20-001(c). Because tuff was encountered at a very shallow depth (less than 1-2 ft bgs), it was

decided the samples above the soil-tuff interface would not provide meaningful characterization data for the site. The sampling for SWMU 20-001(c) was not conducted in the proper locations during 1995 investigations. The results of geophysical survey conducted in 2010 did not identify the landfill boundaries. The Permittees propose to collect additional samples during a second phase of investigation to define the extent of contamination. Before collecting additional samples, the Permittees must conduct a historical document search to ensure that the samples collected during 2010 investigations are indeed from the location of former landfill.

17. Section 9.1.1, Conclusions, Former TA-20, page 106:

NMED does not concur with the response to this comment. Polychlorinated biphenyls (PCBs) were detected at several locations at TA-20 and must be retained as chemicals of potential concern (COPCs) for risk evaluation purposes. Regardless of the source of the contamination, PCBs are present at the site and do contribute to the overall risk. If PCBs drive risk above target levels, the Permittees may wish to consider tying the remediation costs to the source area, but the fact that PCBs are present at TA-20 cannot be ignored and PCBs cannot be excluded from the site risk assessments.

18. Section B-5.3, Subsurface Tuff Sampling Methods, page B-4:

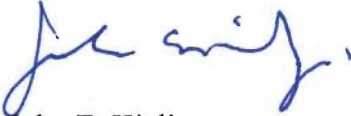
The response to this comment is not adequate. The Permittees have not demonstrated that appropriate methods have been used to collect samples for volatile organic compounds (VOCs) analysis. The Permittees must specifically describe the methods used to collect samples for VOCs. The Permittees must describe in detail the methods used to collect the samples from the sampling device, the procedures used to transfer the samples to sampling containers, the types of sample containers used, how the sample containers were filled to eliminate headspace, and the method of storage for the sample containers. Methods used to collect samples for different media such as soil, sediment, and tuff, must be described separately. The Permittees state that sample material had to be broken to fit into sample containers. It is not clear from the text that after samples were transferred into appropriate containers, how the samples were "broken" and whether there was any head space in the sample container after it was filled. The Permittees must describe every step of sample collection in detail so NMED can determine the validity of VOC data.

The Permittees must address all comments and submit a response by **September 19, 2011**. The Permittees must submit replacement pages with the response. The Permittees must include a table that details where all revisions have been made to the Report and that cross-references NMED's numbered comments. The replacement pages must be in the form of two paper copies and one electronic copy in accordance with Section XI.A of the Order. In addition, the Permittees must submit a redline-strikeout version of the replacement pages that includes all changes and edits to the Report (electronic copy) with the response to this second NOD.

Messrs. Rael and Graham
September 8, 2011
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Please contact Neelam Dhawan of my staff at (505) 476-6042 should you have any questions.

Sincerely,



John E. Kielling
Acting Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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File: LANL, Lower Sandia Canyon Aggregate Area IR, 2011.
LANL 11-019

NAME Edwin Lucero
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DATE 9/9/11

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Hazardous Waste Bureau
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09/08/2011

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