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Official Correspondence Form

U1201056

Name:	U1201056
Title:	SOIL SAMPLING PLAN FOR TECHNICAL AREA 16 OPEN BURNING TREATMENT UNITS LOS ALAMOS NATIONAL LABORATORY (LANL) EPA ID #NM0890010515 HWB-LANL-12-001
Date Received:	5/16/2012
Addressee Name:	Brandt, Michael Smith, Kevin W.
Originator:	Kieling, John E.
Action Item Description:	Changes to acquire additional data
Action Due Date:	
Responsible for Action:	Search Barndt, Michael
Responsible Office:	PADOP
Distribution:	Brandt, M. Gonzales, P. Greiggs, T. Haagenstad, M. Alexander, W. Ancel, C.

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NEW MEXICO ENVIRONMENT DEPARTMENT

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 15, 2012

Kevin W. Smith
Manager
Los Alamos Site Office
Department of Energy/NNSA
3747 West Jemez Road
Los Alamos, NM 87544

Michael Brandt, Associate Director
Environment, Safety, Health & Quality
Los Alamos National Security, LLC
Los Alamos Research Park
P.O. Box 1663, Mail Stop K491
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U1201056

RE: SOIL SAMPLING PLAN FOR
TECHNICAL AREA 16 OPEN BURNING TREATMENT UNITS
LOS ALAMOS NATIONAL LABORATORY (LANL)
EPA ID #NM0890010515
HWB-LANL-12-001

Dear Messrs. Brandt and Smith:

The New Mexico Environment Department (NMED) received the Department of Energy and Los Alamos National Security, L.L.C. (collectively, the Permittees) proposed soil sampling plan for the Technical Area (TA) 16 Open Burning Treatment Units at Los Alamos National Laboratory (Plan) dated March 6, 2012. NMED proposes that the Permittees modify the Plan to support closure activities at the Burn Tray (TA-16-399) in addition to the sampling related to risk evaluation for the Open Burning (OB) treatment area that includes TA-16-388 (flash pad) and TA-16-399. NMED understands that the Permittees treated waste at a higher annual rate at the OB treatment unit since 2010 than the rate of treatment in the preceding years; therefore, the proposed sampling may indicate whether the increased rate of waste treatment has affected surface soils in the vicinity of the treatment units. In addition, the results of sampling may be used to further refine the OB treatment area risk assessment submitted to NMED in January 2010.

The proposed soil sampling appears to be appropriate. NMED requests the following changes to acquire data related to the closure of the Burn Tray (TA-16-399), which NMED understands has ceased operation.

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1. In addition to the locations provided in Figure 2 of the Plan, collect surface samples at the locations specified in the attached figure for use in the closure investigation for the Burn Tray. If the sampling locations marked on the figure are not at the best possible drainage or sediment deposition locations, move the sample locations to more optimal locations within the fence line and provide the rationale for the changes in the closure report.

2. At one location inside the fence line and at one of the six proposed northernmost sample locations outside the TA-16-399 fence, collect an additional sample from 6 to 10 inches below the ground surface. The sample locations must be selected based on their being the most likely locations to receive the highest volume of contaminants based on drainage, downwind air emissions or previously detected constituents. Provide the rationale for the selected locations in the closure report.

3. Analyze the samples collected within the TA-16-399 fence line and the samples collected from the six northernmost proposed sample locations for explosive compounds, semivolatile organic compounds (SVOCs) and perchlorate in addition to the analyses proposed in the Plan.

4. Calculate human health and ecological risk based on the metals and dioxin and furan analytical results. Compare the results to the results included in the January 2010 risk assessment. In addition, combine the data sets and recalculate human health and ecological risk. If explosive compounds or SVOCs are detected in concentrations that would affect the risk assessment, include those compounds in the risk calculation. If SVOCs and explosive compounds are detected and it is determined that detected concentrations do not affect the risk assessment, provide an explanation in the appropriate documents that address risk assessment and closure activities at the OB treatment unit.

5. Ensure that the soil sampling methods correspond to the methods used to collect soil samples at the OB treatment unit in 2009. Include descriptions of all field activities conducted (e.g., sampling methods, decontamination, sample handling [see Permit Section 11]), all statistical and risk calculations, analytical summary tables, laboratory reports, and figures depicting labeled sampling locations in the permit modification application and the TA-16-399 closure report, as appropriate.

6. Include the OB treatment unit risk assessment, including comparisons to the previous data used for the January 2010 risk assessment as an attachment to the permit modification application to add the OB treatment unit to the current LANL Permit.

Should you have any questions, please feel free to contact Dave Cobrain at (505) 476-6055.

Sincerely,

John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
T. Hall, NMED HWB
C. de Saillan, NMED OGC
S. Yanicak, NMED DOE OB, MS J993
T. Skibitski, NMED DOE OB
L. King, EPA 6PD-N
G. Turner, NNSA LASO, MS A316
Tony Grieggs, LANS, MS-K490
M. Haagenstad, LANS, MS K490

file: Reading and LANL TA-16 and RCRA Permit

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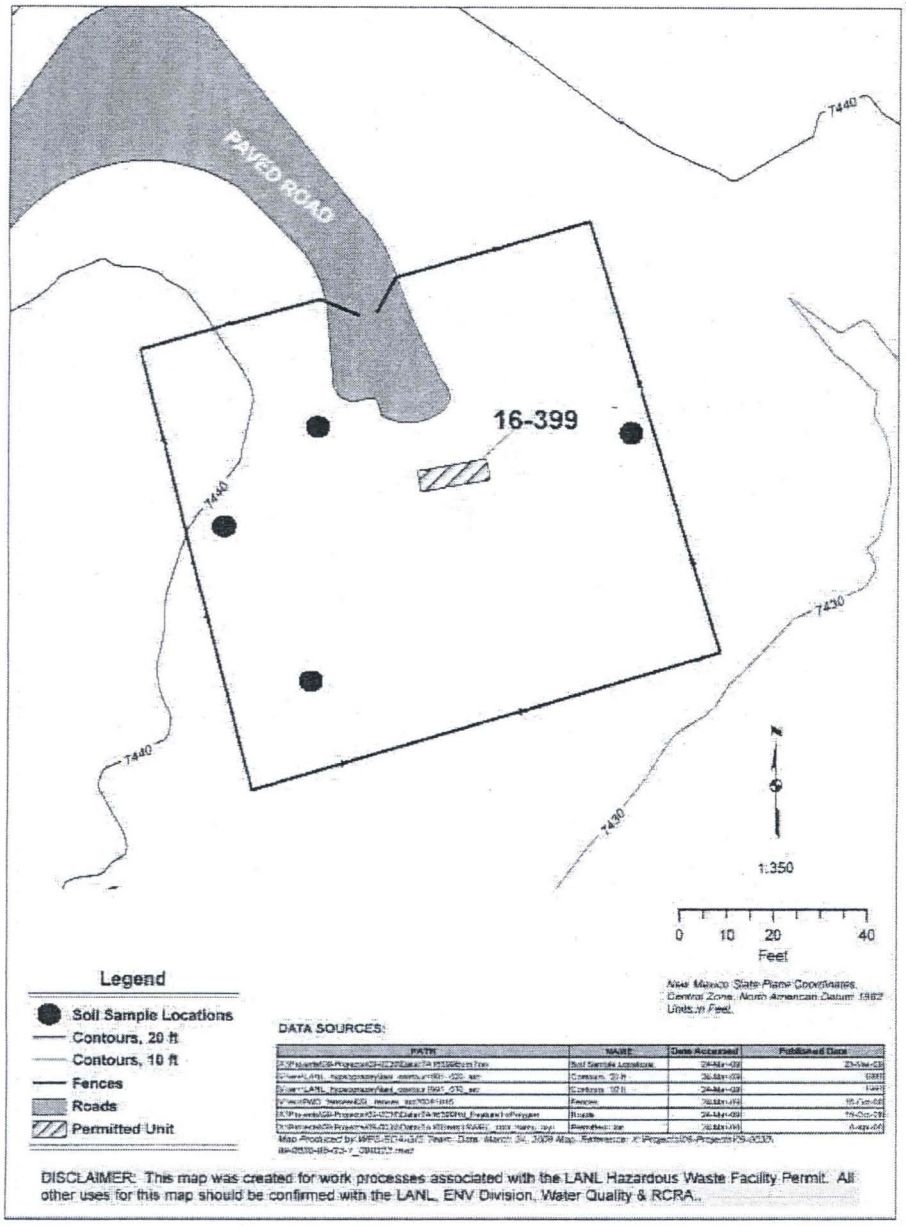


Figure G.3-1: Technical Area (TA) 16-399 Outdoor Treatment Unit Soil Sampling Locations

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