Response to the "Approval with Modifications Interim Measures Completion Report Solid Waste Management Unit 73-001(a) at Technical Area 73 Los Alamos National Laboratory EPA ID #NM0890010515, HWB-LANL-04-007," Dated April 19, 2007

INTRODUCTION

To facilitate review of this response to the notice of approval with modifications, the New Mexico Environment Department's (NMED's) comments are included verbatim. The U.S. Department of Energy's (DOE's) responses follow each NMED comment.

COMMENTS

NMED Comment

1. *Section 6.0 Regulatory Criteria, page 14*

   The Permittees state that items which were greater than 50 percent buried were left in place provided they could not be potentially mobilized by runoff. The Permittees must explain if any of the items greater than 50 percent buried exhibit signs of potentially contaminating the environment at a future date. The Permittees must also explain if they intend to return to the site at a later date and remove those buried items or provide for monitoring of contaminant transport from these locations. If monitoring will occur, the Permittees must provide a monitoring schedule and locations, and define action levels if contaminant migration is observed.

DOE Response

1. Los Alamos National Laboratory (the Laboratory) collects samples of runoff from Solid Waste Management Unit (SWMU) 73-001(a) as part of Site Monitoring Area (SMA) P-SMA-1. Runoff is collected from a monitoring point at a representative location at the lower portion of the SWMU. Monitoring is being conducted on a quarterly basis under the current Federal Facilities Compliance Agreement/Administrative Order (FFCA/AO). Monitoring at gage station E060 in lower Pueblo Canyon is also being conducted under the FFCA/AO. Future site-specific monitoring for SWMU 73-001(a), and potential associated stormwater management actions (e.g., best management practices) will be guided by the requirements and applicable standards in the pending National Pollutant Discharge Elimination System Individual Permit for stormwater discharges. In 2006, four stormwater samples were collected by the laboratory. Analytical data from these four sampling events were included in the 2007 Storm Water Pollution Prevention Plan.

   Additional monitoring is occurring semiannually in the canyon at surface water baseflow locations "Pueblo 3" and "Pueblo above SR-502" under the Interim Facility-wide Groundwater Monitoring Plan and will be reported in periodic monitoring reports.

NMED Comment

2. Section 7.3.2 Analytical Data Summary, page 21:

The Permittees state that two compounds (endosulfan sulfate and endrin ketone) do not have NMED or EPA published SSLs. The Permittees provide the surrogate for endrin ketone but not for endosulfan sulfate. The Permittees must state the surrogate used. The suggested surrogate is endrin.

DOE Response

2. DOE and Los Alamos National Security agree that the appropriate surrogate for endosulfan sulfate is endrine. Page 21 and the first page of Table 12 (p. 53) have been revised and are included in Attachment 1.

NMED Comment

3. Table 13 Field Duplicate Variability Determination, page 95:

It is not clear what the units are for the data presented in this table. The "Concentration" column says the units are mg/kg but the "Units" column says µg/kg. The Permittees must clarify this discrepancy.

DOE Response

3. DOE agrees that the data presented in Table 13 are inconsistent with respect to the units shown. Table 13 has been revised and is included in its entirety in Attachment 1.

NMED Comment

4. Appendix E Photographs:

The appendix shows photographs of sample locations and field activities. Photographs 2, 4, 5, 6, 7, and 8 are identical to photographs 31, 32, 33, 34, 35, and 36, respectively; however, the captions indicate that the author of the Interim Measures Completion Report intended them to be different. The Permittees must submit the photographs with the correct corresponding captions.

DOE Response

4. DOE recognizes the error of duplicated photographs as stated in the approval with modifications. Our contractor is working diligently to recover the photographs from archives and make corrections to the captions. DOE will revise Appendix E as needed for accuracy and submit it to NMED by June 8, 2007.