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Date: March 16, 2007
Refer To: EP2007-0155

Mr. James Bearzi
NMED-Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Response to the Approval with Modifications for the Investigation Work Plan for Cañon de Valle Aggregate Area, Los Alamos National Laboratory, EPA ID #NM0890010515, HWB-LANL-06-021, Dated February 9, 2007

Dear Mr. Bearzi:

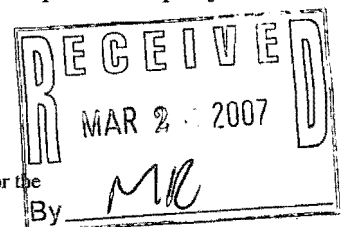
To facilitate review of this response, the New Mexico Environment Department's (NMED's) comments requiring a response are included verbatim. Los Alamos National Laboratory's (LANL's or the Laboratory's) responses follow each NMED comment. A meeting held between LANL and NMED on March 9, 2007, addressed a number of NMED comments. Responses are provided to those comments where NMED indicated a response is necessary.

I.9 Schedule of Investigation Report Submittals:

NMED Comment

I.9 NMED concurs with the proposed submittal of multiple investigation reports for the Cañon de Valle Aggregate Area (one report for the TA-16 subaggregate, one for the TA-15 subaggregate, and one for the TA-14 subaggregate). NMED suggests that the submittals be staggered to expedite the review with due dates of January 15, June 15, and December 15, 2012 for the Investigation Reports for TA-16, TA-15 and TA-14, respectively.

The Permittees must confirm their agreement to modify the Order schedule in writing within 30 days of the receipt of this letter. NMED will adjust the Order schedule upon receipt of written agreement.



In addition, NMED recommends that the Permittees submit the risk assessments for the investigations following approval of the investigation Reports. This will eliminate the need to revise the risk assessment if additional work is required to define nature and extent of contamination.

LANL Response

I.9. LANL agrees to the submission of multiple investigation reports and requests the following schedule for delivery, as discussed during the meeting of March 9, 2007:

- TA-14, due January 15, 2012
- TA-15, due June 15, 2012
- TA-16, due December 15, 2012

II.1. References Missing from Administrative Record:

NMED Comment

II.1 The following references included in the Plan were not found in the Administrative Record:

- a. *LANL, May 2004. "Final Well CdV-16-3(i) Completion Report," Los Alamos National Laboratory, Los Alamos, New Mexico. (LANL 2004, 87645)*
- b. *LANL, September 1997. "Voluntary Corrective Action Completion Report for Potential Release Sites 14-002(a) Firing Site 010 Sump Field Unit 2," Los Alamos National Laboratory document, Los Alamos, New Mexico. (LANL 1997, 56611)*
- c. *USAF (U.S. Air Force), November 22, 1958. TA-9 and TA-6 Aerial Photograph, Los Alamos National Laboratory Environmental Programs Records Processing Facility, Los Alamos, New Mexico. (USAF 1958, 05855)*

The Permittees must submit the above documents to NMED within 30 days of the receipt of this letter to be included in the Administrative Record.

LANL Response

II.1 The requested references are provided on the CD that accompanies this response.

- Note that the correct reference for the final well CdV-16-3(i) completion report is as follows: Kleinfelder, May 2004, "Final Borehole CdV-16-3(i) Status Report, Los Alamos National Laboratory, Los Alamos, New Mexico," report prepared Los Alamos National Laboratory, Project No. 37151/11.12, Albuquerque, New Mexico. (Kleinfelder 2004, 087845).
- Note that the correct ER ID number for the TA-09 and TA-06 aerial photograph is 015855.

II.2 Section 2.2 Surface Water, page 7, paragraph 2:

Permittees' Statement

II.2 "HE...and RDX...were also detected at gauging stations E256, E257, and E262 (LANL 2006, 92600, Attachment 2, Table A9). RDX did not exceed the wSAL, no wSAL is available for the other HE...."

NMED Comment

II.2 Table A-9 of the Storm Water Pollution Prevention Plan (SWPP vol. 1) reports that RDX was detected at the gauging stations listed above, but Table A9 does not have a column for wSALs. Table 3-3 (p. 3-9 of the SWPP vol. 1) provides a summary of LANL Storm Water Screening Action levels (wSALs), but does not include RDX. The permittees must submit a copy of the appropriate table in the SWPP or other applicable document within the 30 days of receipt of this letter.

LANL Response

II.2 Table 3-3 in volume 1 of the Stormwater Pollution Prevention Plan (SWPPP) includes RDX (see p. 3-11, the third page of Table 3-3).

II.3 Section 2.5.1, Site Description and Operational History, page 17, paragraphs 1-3:

NMED Comment

II.3 A report prepared by Border Demolition and Environmental, Inc. (2005, 92461) has been provided as a reference for removal of buildings 16-224, 16-226 and 16-220. The Report documents work performed at TA-15, not TA-16. The Permittees must provide the correct reference that includes work at TA-16 within 30 days of receipt of this letter.

LANL Response

II.3 The correct reference to this report, which is included on the attached CD, is as follows: LANL, October 2003. "TA-16-220 Complex D&D Demolition Completion Report," Los Alamos National Laboratory document, Los Alamos, New Mexico. (LANL 2003, 092460)

If you have any questions, please contact John McCann at (505) 665-1091 or (jmccann@lanl.gov).

Sincerely,



Carolyn A. Mangeng, Acting Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,



George J. Rael, Assistant Manager
Department of Energy
Los Alamos Site Office

Mr. James Bearzi
EP2007-0155

March 16, 2007

CAM/GJR/JM:ew

Attachment: CD of requested references

Cy: (w/att.):

G. Rael, DOE-LASO, MS A316 (w/CD)
D. Gregory, DOE LASO, MS A316 (w/CD)
R. Navarez, OST, Service Center-1 (w/CD)
J. McCann, EP-CAP, MS M992 (w/CD)
EP-CAP File, MS M992 (w/CD)
RPF, MS M707 (w/two CDs)

Cy: (letter and CD only)

L. King, EPA Region 6
P. Reneau, EP-ERSS, MS M992

Cy: (w/o att.)

T. Skibitski, NMED OB
C. Mangeng, ADEP, MS J591
A. Dorries, EP-ERSS, MS M992
P. Reneau, EP-ERSS, MS M992
G. Dover, EP-CAP, MS M992
D. McInroy, EP-CAP, MS M992
ADEP File, MS J591
IRM-RMMSO, MS A150
Public Reading Room, MS J591

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Subject: Response to the Approval with
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Plan for Cañon de Valle Aggregate
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