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Date: October 1, 2007
Refer To: EP2007-0589

James P. Bearzi, Bureau Chief
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Submittal of the Plan to Investigate the Source of Polychlorinated Biphenyls at LA-SMA-2

Dear Mr. Bearzi:

Los Alamos National Laboratory (the Laboratory) has assessed the New Mexico Environment Department's (NMED) requirements, outlined in a letter dated August 30, 2007, approving with direction the "Supplemental Investigation Report for Los Alamos and Pueblo Canyons." In this approval letter, NMED directs the Laboratory to submit a plan to "investigate the source of PCBs at LA-SMA-2." The implementation of the "Investigation Work Plan for Upper Los Alamos Canyon Aggregate Area," which was approved by NMED on November 6, 2006, will characterize potential sources of polychlorinated biphenyls (PCBs) in the area of former Technical Area (TA) 01. This letter outlines the initial plan for investigating the source of PCBs in LA-SMA-2.

All TA-01 solid waste management units (SWMUs) that are not administratively complete, including SWMU 01-001(f), will be investigated during this effort. Nearly 500 samples will be collected, all of which will be analyzed for PCBs. This effort will allow the Laboratory to assess historical PCB use in the area and to determine if residual concentrations persist. To identify potential sources of PCBs for LA-SMA-2, 43 of the TA-01 samples are to be collected within the footprint of SWMU 01-001(f) and associated outfall, located directly upgradient of and within the LA-SMA-2 watershed. In addition to the abovementioned samples, grab samples will be collected from soil located at the head of drainage areas within the LA-SMA-2 watershed and analyzed for PCBs. These drainage locations are not associated with a TA-01 SWMU or area of concern; however, data from the drainage area(s) may help identify the source of PCBs. Research will also be conducted to determine if any available data exist that will help identify the source of PCBs at LA-SMA-2.

Samples will be collected using a spade and scoop or hand auger to characterize surface and near-surface contaminant sources with the potential to impact stormwater runoff. A hollow-stem auger drill rig may be used to collect samples from former subsurface sources that may have discharged to the canyon, such as sanitary sewers and storm drains.

The TA-01 sampling locations are shown on the attached plate. Note that the area of former TA-01 is now densely developed with roads, structures, and utilities, thus limiting the areas available for sampling. Furthermore, much of the area is privately owned, and therefore sampling is subject to approval by property owners.

The Laboratory believes that implementation of the approved Upper Los Alamos Aggregate Area work plan, scheduled to be implemented during fiscal year 2008, is the best first step to identifying the source of PCBs in the TA-01 area. Following review of PCB data, additional focused soil and/or stormwater sampling may be proposed, as necessary, to satisfy NMED's requirement to determine the source of PCBs at LA-SMA-2. If additional sampling is needed, it will be planned in conjunction with, and approved by, NMED.

If you have any questions, please contact Becky Coel-Roback at (505) 665-5011 (becky_cr@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (crodriguez2@doeal.gov).

Sincerely,

Susan G. Stiger, Associate Director
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David R. Gregory, Project Director
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