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United States Government

Department of Energy

memorandum

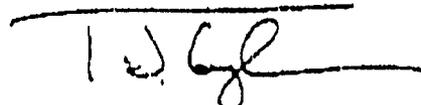
Field Office, Albuquerque
Los Alamos Area Office
Los Alamos, New Mexico 87544

DATE:
REPLY TO: LESH,TJT,NOD1098.ACTION94.10.01.93.001
ATTN OF:
SUBJECT: Notice of Deficiency for Work Plan for Operable Unit 1098

TO: R. W. Vocke, Program Manager, UC-LANL, EM-13, MB M992

The Los Alamos Area Office (LAO) received the attached (unsigned) letter from William K. Honker, U.S. Environmental Protection Agency, dated September 28, 1993, which is the Notice of Deficiency (NOD) for the Work Plan for Operable Unit 1098. Please consider the comments in the NOD, and submit a draft response to me by October 19, 1993.

If you have questions, please call me at 565-7203 or ask your staff to call Mike Gilgosh of Sciencetech at 567-5794.



Theodore J. Taylor
Program Manager
Environmental Restoration Program

Attachment

cc w/ attachment:
T. Taylor, LAO
K. Bitner, ERPO, AL, MB A906
K. Schenck, Sciencetech/LAO

cc w/o attachment:
J. Vozella, LAO
C. Peemire, LAO
S. Slaten, LAO
R. Harris, EM-452, HQ
J. Shipley, EE-AETO, UC-LANL, MB F641
D. Bankey, FIN-18, UC-LANL, MB A107

DARAP 20-1
Gy Paul
RPF
Pat Shanley
RWV



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Received by ER-RPF
OCT 04 1993
YCG

List of Deficiencies

General Comments:

1. The schedule for submittal of the RFI Report is not acceptable considering that RFI field work is to be completed on 12/18/93. The RFI Report must be submitted in a timely fashion. In addition, the schedule for any phased report submittals should also be included in the overall schedule.
2. It is unclear from a comparison of the text and tables whether use of EPA Method 8010, ICP and EPA Method 7470, Cold Vapor means that analysis will be conducted for only total chromium and mercury or for all potential analytes using the above methods. LANL shall clarify what analysis is being proposed.
3. Chapter 6, p. 6-1 and Chapter 7, Section 7.1-1 - It is not appropriate to base analysis on a set of indicator constituents. In Chapter 7.7-1 text indicates that only 20% of the samples will be analysed for SVOCs, VOAs, inorganics and pesticides. Were pesticides used or stored at these Technical Areas? Sample reduction should only be based on process knowledge or previous sampling results with approval from EPA. Following initial sampling a reduction in analysis may be requested based on results of the phase I sampling.
4. All Subsurface Sampling - Samples should be collected at a preset interval if screening does not detect radioactivity or organics. Samples may be collected based on lithology and visual observation within each preset interval. All core samples should be screened with a PID or FID.
5. In future workplans, for ease in reviewing it would be helpful if LANL would combine SWMU descriptions, history and sampling plans in one section when these units are being investigated at the same time (i.e. Section 7.10 and 7.11).
6. No Further Action Criteria:

NFA Criterion 2 - Unless the permit addresses corrective action for any releases prior to permitting this is not a reason for NFA.

NFA Criterion 3 - The potential release site has been properly closed. This must be defined as being certified or approved by a regulatory agency.

NFA Criterion 4. That a release has not occurred nor is likely to occur from an PRS is a reason for NFA. Institutional control is not a reason for NFA.

All of the sites discussed in Chapter 9 for NFA need not be added to the NSWA permit for investigation.

