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MISCELLANEOUS:



LOS ALAMOS NATIONAL LABORATORY

12

United States Government

Department of
Energy

memorandum

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

DATE: JAN 23 1996

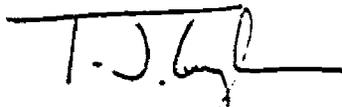
REPLY TO
ATTN OF: LAAMEP:2ET-007

SUBJECT: Notice of Deficiency for RCRA Facility Investigation (RFI) Report for OU-1132, TA-39
Submitted to the Environmental Protection Agency (EPA) on April 28, 1995

TO: Jorg Jansen, Project Manager, EM/ER, LANL, MS-M992

The EPA has reviewed the RFI Report for Technical Area 39, submitted on April 28, 1995, and found it to be deficient. Attached is the list of NODs in which Field Unit 2 must respond. LAAO is requesting a draft response be submitted for Field Project Coordinator review on March 12, 1996. The response is due to EPA on April 9, 1996. Please have Field Unit 2 coordinate with Everett Trollinger of my staff for this response.

Should you have any questions, please contact Everett Trollinger at 667-5801.



Theodore J. Taylor
Program Manager
Environmental Restoration Program

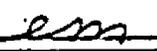
Attachments

cc w/attachments:

B. Garcia, Bureau Chief
Hazardous and Radioactive Materials
Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, New Mexico 87505

N. Weber, Bureau Chief
Agreement in Principle, DOE Oversight
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, New Mexico 87505

N. Naraine, EM-453, HQ
T. Taylor, AAMEP, LAAO
E. Trollinger, AAMEP, LAAO
J. White, ESH-19, LANL, MS-K490
G. Gould, ESA-DE, LANL, MS-G787

Received by ER-RPF
JAN 26 1996


Jorg Jansen

2

JAN 23 1996

S. Yanicak, DOE Oversight Bureau
NMED, LANL, MS-J993
S. Anderson, DOE Oversight Bureau
NMED, LANL, MS-J993
~~RPE:LANL, MS-M707~~
D. Griswold, ERD, AL

cc w/o attachments:

W. Spurgeon, EM-453, HQ
J. Vozella, AAMEP, LAAO
T. Baca, EM-DO, LANL, MS-J591
G. Rael, ERD, AL

10-00000000-0000



file 1,4,2,6,1,20,1,4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 6
 1445 ROSS AVENUE, SUITE 1200
 DALLAS, TX 75202-2733

DEC 31 1995

Mr. Theodore J. Taylor
 Program Manager
 Department of Energy
 Los Alamos Area Office
 Los Alamos, NM 87544

Rec'd at
 LAAO
 11/10/92
 2:32 p.m.

Elliott - Pls
 draft memo to
 Jorg and work
 with Gene to
 identify any
 major issues
 :: "show steps"

Re: Notice of Deficiency, RFI Report Technical Area 39
 Los Alamos National Laboratory (NM0890010515)

Dear Mr. Taylor:

The Environmental Protection Agency (EPA) has reviewed the RCRA Facility Investigation (RFI) Report for Technical Area 39, and found it to be deficient. Enclosed is a list of deficiencies which Los Alamos National Laboratory has ninety (90) days from the date of this letter to respond to.

Should you have any questions, please feel free to contact Ms. Barbara Driscoll at (214) 665-7441.

Sincerely,

David W. Neleigh
 David W. Neleigh, Chief
 New Mexico and Federal
 Facilities Section

Enclosure

cc: Mr. Benito Garcia
 New Mexico Environment Department
 Mr. Jorg Jansen
 Los Alamos National Laboratory, MS M992

Ted

P.S. Pls

work with
 Bonnie on
 any inconsistencies
 with the RFI
 report guidance
 that has been
 issued.

cc JST

locations this PRS may not characterize the complete nature and extent of contamination.

Provide additional information concerning the physical characteristics of, and the waste handling practices at, PRS 39-002(c). Information concerning physical characteristics should include historical drainage pathways, previous structures, and the addition or removal of paved parking or storage areas. Waste information should include waste types, rates of waste generation, the ultimate fate of waste materials, and references to—or records of—these activities. If no records are available, LANL should so state.

18. Chapter 4, PRS 39-002(c), Section 4.1.3.5, page 4-20

Based on the elevated concentrations of uranium, lead, and PCBs the report recommends a voluntary corrective action (VCA) for this PRS. The report indicates that concentrations of uranium are 38 times greater than their SAL, and that lead concentrations are about 400 times greater than their SAL. At PRS 39-002(a), contamination of similar magnitude was recommended for expedited corrective action (ECA). Consequently, the report should explain the recommendation of a VCA, instead of an ECA, at this PRS.

19. Chapter 4, PRS 39-002(d), Section 4.1.4, page 4-20

The report does not include sufficient background information to support the limited "biased" sampling strategy used to characterize the potential contamination at this PRS. Although current physical characteristics generally support the selection of these biased sampling locations, the existing conditions may not be representative of historical conditions. Therefore, biased sampling locations this PRS may not characterize the complete nature and extent of contamination.

Provide additional information concerning the physical characteristics of, and the waste handling practices at, PRS 39-002(d). Information concerning physical characteristics should include (1) historical drainage pathways, (2) previous structures, (3) whether the electric closet was used to house PCB-containing transformers, (4) whether the electric closet is connected to a drainage system, and (5) the addition or removal of paved parking or storage areas. Waste information should include waste types, rates of waste generation, the ultimate fate of waste materials, and references to—or records of—these activities. If no records are available, LANL should so state.

this magnitude is not considered to constitute a potential human health risk." Any concentration over the SAL should be considered a potential risk, because the SAL is a breakpoint. EPA recommends that copper be evaluated as a potential health risk.

24. Chapter 4, PRS 39-007(a), Section 4.1.7, page 4-32

According to the report, transformer oil was stored at this PRS. LANL should provide historical and current information concerning the handling and disposal of PCBs at this PRS.

Also, provide additional information concerning the physical characteristics of, and the waste handling practices at, PRS 39-007(a). Information concerning physical characteristics should include historical drainage pathways, previous structures, and the addition or removal of paved parking or storage areas. Waste information should include waste types, rates of waste generation, the ultimate fate of waste materials, and references to—or records of—these activities. If no records are available, LANL should so state.

25. Chapter 4, PRS 39-007(a), Figure 4-7, page 4-34

The figure does not clearly show whether soil samples were collected from the stained soil. LANL should modify the figure to show the area of stained soil. LANL should also justify its selection of sampling locations, because sediment/soil samples were not collected from drainage pathways as they were at PRS 39-002(e) and 39-002(f).

26. Chapter 4, PRS 39-007(a), Section 4.1.7.5, page 4-36

According to the report, LANL recommends VCA, instead of ECA, for this PRS. High concentrations of PCBs were discovered at this site; based on the information presented in the report, this contamination may have resulted from transformer oil spills. According to TSCA (OFR 1995), cleanup of PCB spills must begin within 24 hours of the discovery of the spill. LANL should explain the delay in cleaning up the PCBs found at this PRS.

27. Chapter 4, PRS 39-007(d), Section 4.1.8, page 4-37

Justify the selection of analyses for the soil samples collected at this storage area. VOC analysis was not conducted for samples collected at this PRS, although the report indicates that (1) acetone, oil, and kerosene have been stored at this area, and (2) releases of these solvents have stained the soil next to the east side of the storage area. EPA recommends that the stained soil be analyzed for VOCs.

4-11111 • 1111111111 • 1111

28. Chapter 4, PRS 39-007(d), Figure 4-8, page 4-38

The figure does not clearly show whether soil samples were collected from the stained soil. Modify the figure to show the area of stained soil.

29. Chapter 4, PRS 39-006(a), Section 4.2.1.1.1, page 4-45

Justify the changes to the RFI work plan sampling strategy for the active sand filter. Based on the information presented in the report, EPA has determined that LANL has failed to adequately characterize the depth of contamination. According to the report, LANL determined the sampling depth from engineering drawings. However, the work plan required subsurface sampling to a depth of 2 feet below the sand-tuff interface. Subsurface samples should have been (1) collected continuously from ground surface the total depth of the boring, and (2) field-screened until clean soil was encountered. Then, the samples for analysis should have then been selected from the soil that was most contaminated.

30. Chapter 4, PRS 39-006(a), Section 4.2.1.3.1, page 4-52

See deficiency #29.

Also, according to the report, LANL collected no samples from the sand media within the inactive sand filter. The filter has accumulated potentially hazardous contaminants and may be a source of contamination. EPA recommends that samples from within the inactive sand filter be collected to properly characterize its potential as a source of contamination.

31. Chapter 4, PRS 39-006(a), Section 4.2.1.3.6, page 4-54

The no further action recommendation for this PRS is based on partial data, because additional samples are needed to adequately characterize the inactive sand filter. After samples have been collected, the recommendations in this section should be modified to reflect the results of the additional sampling data.

32. Chapter 4, PRS 39-006(a), Section 4.2.1.4.1, page 4-55

According to the report, samples AAA6289 and AAA6290 were collected from boring ID# 39-1088. However, Figure 4-11 indicates that samples AAA6291 through AAA6294 were collected from this boring; Figure 4-10 indicates that samples AAA6289 and AAA6290 were collected from boring ID# 39-1087. Explain these discrepancies.

33. Chapter 4, PRS 39-006(a), Section 4.2.1.5.1, page 4-60

According to the report, LANL collected no samples from the contents of the septic tank. Potentially hazardous contaminants may have accumulated in this area. EPA recommends that additional subsurface soil samples be collected to adequately characterize the active septic tank.

34. Chapter 4, PRS 39-006(a), Section 4.2.1.5.5, page 4-62

The no further action recommendation for this PRS is based on partial data, because additional samples are needed to adequately characterize the active septic tank. After samples have been collected, the recommendations in this section should be modified to reflect the results of the additional sampling data.

35. Chapter 4, PRS 39-005, Section 4.2.3.1, page 4-66

According to the RFI report, "because the precise location of the former pit is not known, samples were collected from the location thought most likely to have been the site of the pit." No HE or HE metabolites were measured in the samples collected. Justify the selected sampling locations. Also, explain why a geophysical survey was not used to determine the location of the pit before sampling.