

ATTACHMENT LIST

A) Form TO: L. Slater FROM: _____ SYMBOL: _____
 SUBJECT: Task Assignment / Information Form for NOD
for 041129
 DATED: 06/28/93

B) Letter TO: Mr. Joseph C. Vozeella FROM: William K. Honker SYMBOL: _____
 SUBJECT: Notice of Deficiency for RFI Work Plan Operable
Unit 1129 OASD NM0890100515
 DATED: 06/15/93

C) List TO: _____ FROM: _____ SYMBOL: _____
 SUBJECT: List of Deficiencies
 DATED: _____

D) _____ TO: _____ FROM: _____ SYMBOL: _____
 SUBJECT: _____
 DATED: _____

E) _____ TO: _____ FROM: _____ SYMBOL: _____
 SUBJECT: _____
 DATED: _____

F) _____ TO: _____ FROM: _____ SYMBOL: _____
 SUBJECT: _____
 DATED: _____

G) _____ TO: _____ FROM: _____ SYMBOL: _____
 SUBJECT: _____
 DATED: _____

memorandum

(9)

DATE: JUL 01 1993

REPLY TO

ATTN OF: LESH:788-032

SUBJECT: Operable Unit (OU) 1129 Notice of Deficiency (NOD)

TO: Robert Vocke, EM-13, LANL, MS-M992

Attached is the NOD for OU 1129 received from the Environmental Protection Agency on June 22, 1993, which requires a response within 30 days of receipt.

Please arrange a meeting to discuss the responses by July 8, 1993, in order to have the final formal response to my office by July 15, 1993.

Ted Taylor, Manager
Environmental Restoration Program
Environment, Safety, and Health
Branch

Attachment

cc w/o attachment:

A. Pratt, EES-13, LANL, ✓

MS-J521

J. Aldrich, EES-1, LANL, ✓

MS-D462

K. Bitner, ERPO, AL

ASAP

C1

Paul
RPF

Pat Shanley

7-6

RWV at 1/6 noon

Plan Phase as appropriate

Received by EG-RPF
JUL 06 1993
YCB

LOS ALAMOS AREA OFFICE
ENVIRONMENTAL RESTORATION PROGRAM

TASK ASSIGNMENT/INFORMATION FORM

TITLE: NOD For OU 1129
DATE RECEIVED: 6-22-93

DATE DUE: 6-28-93

NAME	ACTION	INFO
C. Fesmire		✓
K. Schenck		✓
S. Slaten	✓	
T. Taylor		✓
P. Treat		✓
J. Vozella		✓
K. Bitner		✓

ACTION: Prepare memo, TT to Vocke,
requesting formal response by
7-15-93, and meeting to discuss
NOD by 7-8-93.

SIGNATURE: CF SS TT JV

CONCURRENCE: CF SS TT PT JV
OTHER: _____

NOTES: Carolyn faxed the NOD to Vocke on 6-22-93.

RESPONSE: _____



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

[JUN 15 1993]

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. Joseph C. Vozella
Acting Chief
Environment, Safety
and Health Branch
Department of Energy
Los Alamos Area Office
Los Alamos, New Mexico 87544

Re: Notice of Deficiency for RFI Work Plan Operable Unit 1129
Los Alamos National Laboratory (LANL)
NM0890100515

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has reviewed your RCRA Facility Investigation (RFI) for Operable Unit 1129 (OU 1129), and has found the work plan to be deficient. You have thirty days from receipt of this letter to address the enclosed list of deficiencies.

This work plan was stylistically more difficult to review than previous workplans, and there were numerous inconsistencies between text and tables. When LANL pursues a Class III Modification for withdrawal of potential "No Further Action" (NFA) Solid Waste Management Units (SWMUs) from the HSWA permit, LANL should reference the SWMUs by the numbers as they are used in the HSWA permit.

Should you have any questions or comments, please contact Barbara Driscoll at (214) 655-7441.

Sincerely,

William K. Honker
William K. Honker, P.E., Chief
RCRA Permits Branch (6H-P)

cc: Benito Garcia, NMED
Al Tiedman, LANL

Enclosure

JUN 22 10 01 AM '93

List of Deficiencies

General Comments:

1. LANL shall provide information on which miscellaneous analytes will be analyzed and which methods will be used for the analysis.
2. All the SWMUs discussed in Chapter 3, should be addressed either by sampling plans in Chapter 7, or by the No Further Action Recommendations in Chapter 6. LANL needs to submit the sampling information for the SWMUs as soon as possible.
3. Chapter 6, SWMUs Recommended for No Further Action:
 - a. SWMU 5-003, Calibration Chamber - LANL shall test the bricks for TCLP. EPA recommends that LANL remove the bricks and recycle them using their Lead Decontamination trailer if necessary.
 - b. SWMU 35-002 - Additional information needs to be submitted concerning this SWMU. What were the hazardous constituents of concern? Who at EPA concurred on the decontamination and decommissioning effort and soil sampling plan? Was a plan submitted to EPA for approval? When will the results of the completed project be submitted to EPA?
 - c. SWMU 42-004, Canyon Disposal - Sampling locations and information should be submitted to EPA for review prior to a decision being made on this unit.
 - d. SWMU 48-004(a-c), Sumps and Tanks - Any decision related to these units will be deferred until D&D has been completed. When is D&D scheduled to occur for this building? LANL has not determined whether a release has occurred from these units.
 - e. SWMU 52-003(b), Industrial Waste Lines - More information needs to be submitted, including sampling data and depth of sampling prior to a decision on this unit.
 - f. All other SWMUs for which no further action (NFA) was requested, and that are not currently in the HSWA permit, do not need to be added to the permit. For SWMUs currently in the permit for which a NFA decision is required LANL must submit a Class III permit modification prior to removal of those SWMUs from the permit.

Specific Comments:

1. SWMU Nos. 52-002(a-g), p. 3-114 - Text on page 3-115 identifies SWMU No. 52-002(e) as now being SWMU No. 63-001(a) while Table 1-1, Current Listing of Operable Unit 1129 SWMUS and AOCs as of 1990 lists SWMUS 52-00(k) as being SWMU 63-001(a-b). Please clarify the SWMU numbers and text.

2. **5.1 Summary of OU 1129 Technical Approach, p. 5-2** - As part of the technical approach, one of the listed approaches indicates that "SWMUs are recommended for CMS when the analytical sample mean exceeds action levels for individual components". Under the proposed Subpart S Regulations, when concentrations of hazardous constituents in ground water, surface water, soils or air exceed an action level, and there is reason to believe that such hazardous constituents have been released from a solid waste management unit at the facility, EPA may require a corrective measure study (CMS). The use of a sample mean for determination of a CMS is not acceptable. This comment also applies to Section 5.2.7 Decision Point 4 on page 5-9. In addition, EPA risk assessment guidance calls for calculating the 95 percent upper-confidence limit (95% UCL) on the arithmetic mean of site contamination rather than the 90 percent confidence interval used by LANL.

3. **7.5.2 Phase I Field Activities Investigation, SWMU Aggregate A, p. 7-17** -

a. Soil samples should be analyzed for metals as well as radioactive components, as indicated in section 7.5.3.

b. SWMU 4-002, the canyonside disposal area, should have at least one corehole through the debris material which is sampled at several intervals, as continuous bulldozing of material may have covered contaminated material. High Explosive (HE) spot testing should also be conducted if possible.

4. **7.6 SWMU Aggregate B, Phase I, p.7-20** -

a. Samples should be analyzed for metals as is indicated in Section 7.6.3. Analysis for metals was left out of Section 7.6.2.

b. Additional sampling should be conducted for SWMU 5-002, Canyonside Disposal as this SWMU is subject to additional erosion due to location on the canyon-side. LANL shall submit an additional work plan for both SWMUs 4-002 and 5-002.

5. **SWMU No 5-004, Septic Tank - Subsurface Investigation p. 7-30**

a. This borehole should be field screened for VOCs and samples should be analyzed for VOCs.

b. It is unclear from the text, the number of samples which will be collected if no radioactivity is encountered. Table 7-2 shows that two samples will be collected, one each at the 5-10 foot depth and the 10-15 foot depth. The tables should be consistent with the text.

c. There is no reason to believe that hazardous constituents are collocated with the radioactive constituents for this liquid discharge area. A sample from each 5-foot section of core should be analyzed for VOCs, SVOCs, and metals.

as located for outfalls from lines 71 and 95.

12. SWMU Nos. 35-003 (e, f, g, m, and o) Surface and Subsurface Investigation, p. 7-44 - Was contamination found when SWMUs 35-003 e, f, g, and o were removed? More information from the previous D&D (p. 3-75) should be provided and this information should be used to create a sampling plan. Boreholes should be located based on best professional judgement where previous spills may have occurred. The area designated as SWMU 35-003(m) should be sampled to a depth of 30 feet, or until field screening indicates no contamination whichever is deeper. Sampling should begin below fill material or at fill/tuff interface.

13. Statement on page 7-45 - The statement beneath Table 7-5 is contradictory to the Table. The Table indicates that all samples will be analyzed for all the contaminants of concern (COC) while the statement indicates that 10 percent of the samples will be analyzed for COCs. All the samples collected from the boreholes should be analyzed for VOCs, metals, PCBs and SVOCs. A reduction in analysis may be requested from EPA after initial results are reviewed.

14. SWMU No. 35-003(r) Surface and Subsurface Investigation, p. 7-46 - Text indicates that "To complement the samples taken at the prescribed intervals, samples will be collected from any sections indicating contamination from field screening techniques". Will these additional samples be analyzed for all potential contaminants? Samples which indicate contamination should be analyzed preferentially.

15. SWMU Nos. 35-009(a-d) -Subsurface Investigations p. 7-60 - Text on this page indicates that the initial 10 percent of sample locations from each SWMU will be analyzed for Level III VOCs, SVOCs, metals, and radioactive contamination and then analysis may be reduced based on results. Table 7-9 and Section 7.10.3 indicate that all samples will be analyzed for Level III VOCs, SVOCs, metals and radioactive constituents. LANL shall clarify what analysis will be conducted.

16. 7.12 SWMU Aggregate B, Phase I, p. 7-71 - Text on page 3-70 indicates that nonradioactive hazardous material may have been emitted from the stack; although, this cannot be verified. What are the possible nonradioactive contaminants of concern? If this SWMU 35-014(a) only has a radioactive component then it should not be listed as a SWMU.

17. 7.14 SWMU Aggregate J, Phase I p. 7-82 - SWMUs 42-001(a-c), 42-002(a,b,) and 42-003 are not listed in the HSWA Module VIII.

18. SWMU Nos. 42-001(a) and 42-002(a) -Subsurface Investigation p.7-87 -

a. Table 7-13, indicates that analysis will be conducted for constituents other than radioactive constituents, while text

d. What are the miscellaneous analytes being analyzed, and what are the analytical methods being used?

6. **SWMU No 5-004, Septic Tank - Surface Investigation p. 7-30 -**

a. What miscellaneous analytes are being analyzed, and what are the methods used in analysis?

b. At what depth will surface samples be collected?

7. **SWMU 5-005(a), French Drain - Subsurface Investigation p. 7-31 -** At least 10 percent of the samples should be analyzed for VOCs.

8. **SWMU 5-005(a) Surface investigation p. 7-31 -** At what depth will samples be collected?

9. **SWMU Nos. 35-003 (a, b, c, and n) Surface and Subsurface Investigations p. 7-35 -**

a. Boreholes should be located based on best judgement rather than randomly from a grid. If the pit and tanks were removed in 1991, it should have been determined at that time whether there was any leakage. If this removal has not been conducted then boreholes should be placed next to the pits where the connection with the inflow and outflow lines occurs. Additional boreholes may be required for the pit. Can the pit be inspected for leaks? Did overflows occur?

b. It is unclear by comparing the text with Table 7-3 which intervals will be sampled. Text indicates samples will definitely be collected within the top 2 feet and at the bottom 5-foot interval. Text then indicates samples will be collected at two areas determined by random generation, at the interval with the highest contamination from radioactive field screening, and if no radioactive contamination is found then at the section's midpoint. Sampling locations need to be clarified and match the Table.

10. **SWMU Nos. 35-003(a-q) Wastewater Treatment Plant: p. 3-38 -** What is the construction of the phase separator pit? Was this an open pit, and did it overflow?

11. **SWMU Nos. 35-003(d, l and q) Surface and Subsurface Investigations, p. 7-42 -** The history of this area and the previous D&D work should be utilized in developing the sampling plan for these SWMUs rather than using a grid and random boreholes. Boreholes should be located preferentially in areas where spills occurred if these are known.

In the area which underwent D&D, contaminated soil was removed to a depth of around 20 feet. The first borehole sample should be collected around the interval where the backfill meets original soil or tuff. Samples should then be collected on 10-15 foot intervals down to 50 feet, and then at total depth unless field screening (radioactive and VOCs) or visual inspection indicates contamination below 50 feet. Boreholes B-11 and B-12 should remain

indicates that sample analysis will be limited to radiological constituents. LANL should clarify what analysis will be conducted. Table 7-13 should be corrected to indicate actual analysis planned for all SWMUs in TA-42.

b. Was there leakage from the influent line to the septic system? If so, then borehole, B-4, should have the same analysis as boreholes, B-12 and others, for the septic tank system.

19. SWMU No. 42-003-Subsurface Investigation, p. 7-95 - Were metals previously analyzed at this SWMU? Text on page 7-95 indicates that SVOCs were previously encountered, and text on page 3-82 indicates that possible contaminants included solvents, acids and greases. For these reasons, a percentage (20%) of the samples collected should be analyzed for metals and SVOCs.

20. 7.13 SWMU Aggregate K, Phase I, p. 7-99 - SWMU 48-0001 is not listed in the HSWA Module VIII.

21. 7.14.3 Sample Screening and Analysis, p. 7-112 - LANL might consider using an X-Ray Fluorescence for screening metals.

UNCLASSIFIED
FACSIMILE TRANSMITTAL SHEET



U. S. DEPARTMENT OF ENERGY
LOS ALAMOS AREA OFFICE
ENVIRONMENT, SAFETY AND HEALTH BRANCH

FAX Number: (505) 665-4504 (Unclassified), Voice Confirm Number: (505) 667-5288

DATE: 6-22-93 # PAGES TO FOLLOW: 6

TO: Bob Vocke FAX NO. S-4747

ORGANIZATION: _____

FROM: Joe Vozella
DEPT. / ROUTE: _____

REMARKS: This is a "heads up"