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

August 11, 1994

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

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) hereby approves the Installation Work Plan (IWP) for Environmental Restoration with the enclosed modifications, and the exception of the items discussed below. The approved work plan consists of the IWP received November 29, 1993, the Notice of Deficiency (NOD) Response dated March 2, 1994 and the enclosed modifications. Los Alamos National Laboratory (LANL) shall implement this work plan immediately.

The schedules for work and deliverables in this version of the IWP are not approved, as they do not reflect the site prioritization work which was agreed to by EPA. The schedules from the prioritization will be approved as a separate document. In addition, the voluntary corrective action (VCA) procedures as outlined are not approved by EPA, as they do not include a request for a Class 3 permit modification. EPA will approve the VCA procedures as a separate document.

If you have any questions, please contact David Neleigh of my staff at (214) 665-6785.

Sincerely yours,

Allyn M. Davis, Director
Hazardous Waste Management Division

Enclosure (1)

cc: Ms. Kathleen Sisneros, Director
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department

Mr. Jorg Jansen, Program Manager
Environmental Restoration Program
Los Alamos National Laboratory, M992

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List of Modifications

1. LANL shall note that EPA's comment in deficiency # 5 has not changed. LANL may use the SAFER approach to decision making; however, for any site the primary purpose of the RCRA facility investigation (RFI) is still to characterize the nature, extent, direction, rate of movement and concentration of releases from a site. This objective should be included in any decision making process for corrective action.

2. Appendix H, 4.2 Binomial Sampling Strategy, p. H-8 and H-9 - EPA has reviewed several work plans in which this binomial strategy was employed, and there was no consistency in usage of the method. There is often no explanation as to how LANL picked the percentage of the site which is potentially contaminated or picked the confidence interval used. If LANL proposes to employ this sampling strategy then staff should be trained in the proper usage, and some attempt at consistency across the lab should be made. EPA will review each individual sampling strategy, and will determine if the number of samples proposed is adequate independent of whether this sampling strategy is used or not.

3. Text as revised in response to deficiency #10 is not approvable. LANL may not use composite sampling to compare against screening action levels (SALs) for a determination of no further action (NFA). Composite samples yield an average or mean value for a site, and therefore make a comparison with action levels difficult. The maximum observed concentration of each constituent of concern should be compared with SALs. EPA will evaluate the maximum and minimum concentrations of each constituent, and compare that concentration to the action levels in order to determine if additional sampling, a Corrective Measure Study (CMS) or no further action is required. The use of discrete samples allows for this type of comparison.

LANL shall note that if the concentrations of all the samples is below SALs, but above background then further sampling in order to delineate the extent of contamination may be required. In order to make this determination, EPA needs to evaluate all the analytical data from a sampling event, and not just the areas where SALs are exceeded. LANL shall revise the second paragraph on page 11 accordingly.