



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
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ES&H DIVISION - LAMAR

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*DO 11/20/11 11:00 AM
H S W A*

Mr. Jerry L. Bellows
Area Manager
Department of Energy
Los Alamos Area Office
Los Alamos, New Mexico 87544

Re: RFI Work Plan for OU 1071
Los Alamos National Laboratory
NM0890010515

Dear Mr. Bellows:

The Environmental Protection Agency has completed a review of the RCRA Facility Investigation (RFI) Work Plan for the Operable Unit 1071 (OU 1071), and has found the work plan to be deficient. You have thirty (30) days from receipt of this letter to address the enclosed list of deficiencies.

Stylistically, the RFI Work Plan for OU 1071 has been more clearly written than the previous work plans reviewed.

not ←

As part of the ongoing RCRA Facility Assessment (RFA) conducted by LANL, the following Solid Waste Management Units (SWMUs) do not appear to require an RFI; therefore, the permit does not need to be modified to include them:

- ~~SWMU 0-008~~ (North Mesa Disposal Area)
- ~~SWMU 0-010~~ (Surface Disposal Area)
- ~~SWMU 0-015~~ (Active Sportsmen's Club Firing Range)
- ~~SWMU 0-025~~ (Tank Mesa "Landfill")
- ~~SWMU 0-026~~ (Gun Mount "Landfill")
- ~~SWMU 0-035 (a)~~ (Surface Disposal)



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List of Deficiencies

Specific Comments

Figure 5-70. Screening and analysis of initial investigations at SWMU Group 19-1. - SWMU Group 19-1 (East Gate Laboratory) pp. 5-143 through 5-155 - All samples should be analyzed for Semivolatile and TAL Metals for Sample Locations 19-002, 19-001 and 19-003 rather than only analyzing 50 % of the samples for these hazardous constituents.

Chapter 6, SWMUs Proposed for No Further Action:

SWMU 0-024 (Cistern on Barranca Mesa) p. 6-3 - Provide the documentation for Aldrich 1991 as to removal of contents of the cistern.

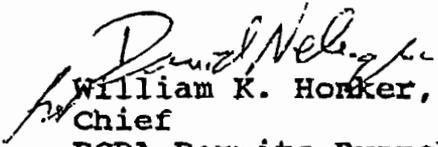
Areas of Concern C-73-001 through C-73-004 - Provide some documentation of removal of tanks and any testing for contamination.

Annex I - Table I-2 p. I-7 through I-9 - Several RFI phase reports are listed as being completed in 1995, it would be preferable if some of these reports were combined into one submittal rather than numerous submittals.

In addition, a Class III modification may be pursued to remove ~~SWMU~~
~~0-005~~ (Mortandad Canyon "Landfill") from the permit.

Should you have any questions or require additional information,
please contact Barbara Driscoll at (214) 655-6785.

Sincerely,


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

Enclosure

cc: Benito Garcia, NMED
Al Tiedman, LANL

TABLE 1-3 (continued)

CURRENT LIST OF SWMUs AND AREAS OF CONCERN
LOCATED IN TECHNICAL AREAS OF OU 1071

Technical Area and SWMU	Title	SWMU, SWMU Aggregate, or SWMU Group	Location of Discussion
0-030(h)	Septic System	0-3	5.10
0-030(i)	Septic System	0-3	5.10
0-030(j)	Septic System	0-3	5.10
0-030(k)	Septic System	0-3	5.10
0-030(l)	Septic System	0-1	5.2
0-030(m)	Septic System	0-1	5.2
0-030(n)	Septic System	0-3	5.10
0-030(o)	Septic System	0-3	5.10
0-030(p)	Septic System	0-3	5.10
0-030(q)	Septic System	0-3	5.10
0-031(a)	Soil Contamination Beneath Former Service Station	0-031(a)	5.11
0-031(b)	Soil Contamination Beneath Former Service Station	0-4	5.12
0-032	Soil Contamination Under Former Motorpool Facility	0-4	5.12
0-033	Soil Contamination Beneath Former Zia Warehouses	0-1	5.2
0-034(a)	"Landfill"	0-5	5.13
0-034(b)	"Landfill"	0-5	5.13
0-035(a)	"Surface Disposal"	0-035(a)	6.8
C-0-020 ^c	Area of Concern—Mortar Impact Area	0-D	5.3
TA-19			
19-001	Septic System	19-1	5.14
19-002	Surface Disposal	19-1	5.14
19-003	Drainline and Outfall	19-1	5.14
C-19-001 ^c	Area of Concern—Potential Soil Contamination Beneath Former Structures	19-1	5.14
TA-26			
26-001	Canyonside Disposal Area	26-1	5.15
26-002(a)	Sump System	26-1	5.15
26-002(b)	Sump System	26-1	5.15
26-003	Septic System	26-1	5.15
TA-73			
73-001(a)	Landfill	73-1	5.16
73-001(b)	Waste Oil Pit	73-1	5.16
73-001(c)	Landfill	73-2	5.17

TABLE 1-3
CURRENT LIST OF SWMUs AND AREAS OF CONCERN
LOCATED IN TECHNICAL AREAS OF OU 1071

Technical Area and SWMU	Title	SWMU, SWMU Aggregate, or SWMU Group	Location of Discussion
TA-0 ^a			
✓ 0-003 ✓	Decommissioned Container Storage Area	0-A	5.1
✓ 0-004 X	Active Container Storage Area	0-1	5.2
✓ 0-005 X	Mortandad Canyon "Landfill" b	0-005	6.1
✓ 0-008 X	North Mesa Surface Disposal	0-008	6.2
✓ 0-010(a) X	Surface Disposal	0-010	6.3
✓ 0-010(b) X	"Landfill" b	0-C	5.2
✓ 0-011(a) X	Mortar Impact Area	0-D	5.3
✓ 0-011(c) X	Mortar Impact Area	0-D	5.3
✓ 0-011(d) X	Mortar Impact Area	0-D	5.3
✓ 0-011(e) X	Mortar Impact Area	0-D	5.3
✓ 0-012 X	Western Steam Plant	0-A	5.1
✓ 0-015 X	Active Firing Range	0-015	6.4
✓ 0-016 X	Inactive Firing Range	0-016	5.4
✓ 0-017 X	Waste Lines	0-017	5.5
✓ 0-018(a) X	Active Wastewater Treatment Plant	0-2	5.6
✓ 0-018(b) X	Active Wastewater Treatment Plant	0-2	5.6
✓ 0-019 X	Decommissioned Wastewater Treatment Plant	0-2	5.6
✓ 0-024 X	Cistern	0-024	6.5
✓ 0-025 X	Tank Mesa "Landfill" b	0-025	6.6
✓ 0-026 X	Gun Mount "Landfill"	0-026	6.7
✓ 0-027 X	DP Road Storage Area	0-F	5.7
✓ 0-028(a) X	Los Alamos County Recreation Area	0-3	5.8
✓ 0-028(b) X	Los Alamos County Recreation Area	0-E	5.8
✓ 0-029(a) X	Leakage from PCB Transformers	0-G	5.9
✓ 0-029(b) X	Leakage from PCB Transformers	0-G	5.9
✓ 0-029(c) X	Leakage from PCB Transformers	0-G	5.9
✓ 0-030(a) X	Septic System	0-F	5.7
✓ 0-030(b) X	Septic System	0-1	5.2
✓ 0-030(c) X	Septic System	0-3	5.10
✓ 0-030(d) X	Septic System	0-3	5.10
✓ 0-030(e) X	Septic System	0-3	5.10
✓ 0-030(f) X	Septic System	0-3	5.10
✓ 0-030(g) X	Septic System	0-3	5.10

TABLE 1-3 (concluded)**CURRENT LIST OF SWMUs AND AREAS OF CONCERN
LOCATED IN TECHNICAL AREAS OF OU 1071**

Technical Area and SWMU	Title	SWMU, SWMU Aggregate, or SWMU Group	Location of Discussion
73-001(d)	Landfill	73-1	5.16
73-002	Airport Incinerator/Surface Disposal	73-2	5.17
73-003	Garbage Truck and Can Cleaning	73-2	5.17
73-004(a)	Inactive Septic System	73-2	5.17
73-004(b)	Inactive Septic System	73-2	5.17
73-004(c)	Inactive Septic System	73-2	5.17
73-004(d)	Inactive Septic System	73-1	5.16
73-005	Surface Disposal	73-2	5.17
73-005	Surface Disposal	73-2	5.17
73-006	Airport Building Outfalls	73-2	5.17
C-73-001 ^c	Area of Concern—Fuel Tank	C-73-001	6.9
C-73-002 ^c	Area of Concern—Fuel Tank	C-73-002	6.9
C-73-003 ^c	Area of Concern—Fuel Tank	C-73-003	6.9
C-73-004 ^c	Area of Concern—Fuel Tank	C-73-004	6.9

a. SWMU 0-001, Surface Impoundments in Mortandad Canyon, will be addressed as part of the Canyons Study (OU 1049). SWMUs 0-007, 0-014, 0-020, and 0-021 have been renumbered and are addressed in this work plan as part of TA-73. (Table 1-2 gives new SWMU numbers). The following SWMUs have been renumbered and are no longer part of OU 1071: 0-002, 0-006, 0-009, 0-013, 0-022, and 0-023.

b. Quotation marks are used in a SWMU title when the title contains a misnomer.

c. SWMU 0-11(e) is the same site as SWMU 0-011(b); therefore, 0-011(b) has been eliminated as a SWMU number.

d. Areas of concern are identified in Appendix C of the SWMU report (LANL 1990, 0145).

1.3 Installation Work Plan

The HSWA Module requires that the Laboratory prepare a master plan, called the Installation Work Plan (IWP), to describe the Laboratory-wide system for accomplishing all RFIs and corrective measures studies (CMSs). The IWP (LANL 1990, 0144; 1991, 0553) has been prepared in accordance with the HSWA Module and is consistent with EPA's interim final RFI guidance (EPA 1989, 0088) and proposed Subpart S of 40 CFR 264 (EPA 1990, 0432), which, when adopted, will implement the cleanup program mandated in Section 3004(u) of RCRA.

The IWP (LANL 1990, 0145; 1991, 0553) identifies the Laboratory's SWMUs (Appendix G) and describes their aggregation into 24 OUs (Subsection 3.4.1). It presents a facilities description in Chapter 2 and a description of the Laboratory's Environmental Restoration (ER) Program in Chapter 3. Annexes I-V contain the Program Management Plan, Quality Program Plan, Health and Safety Program Plan, Records Management Program Plan, and the Community Relations Program Plan, respectively. The document also contains a proposal to integrate RCRA closure and corrective action and a strategy for identifying and implementing interim