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August 11, 1992

Mr. Jerry L. Bellows, Area Manager
Los Alamos Area Office
528 35th Street
Los Alamos, New Mexico 87544

RE: AIP Review of the Operable Unit 1078
RCRA Facility Investigation Workplan

Dear Mr. Bellows:

My Agreement In Principle (AIP) staff have reviewed the RCRA Facility Investigation (RFI) workplan for the Los Alamos townsite (Operable Unit 1078). Staff have concluded that the workplan is not complete. Our response to this workplan is particularly important inasmuch as Los Alamos National Laboratory (LANL) has already implemented it and also because a cursory review of several other RFI's (of the eight so far submitted) indicates they share some of the same problems identified in the OU1078 RFI.

The approach in the workplan seems designed to determine whether a 1974-76 decontamination effort (based solely on radiological survey methods) adequately addressed all residual contamination in the Townsite. It attempts to determine whether surficial surveys for radiological contaminants will be sufficient to discover any significant nonradiological contamination, based on the premise that all chemical contamination was disposed of in combination with radiological contaminants ("codisposal") and has migrated substantially identically with these radiological contaminants ("colocation"). AIP staff concludes that 1) there is no complete data to support codisposal and 2) the colocation premise is technically insupportable.

The essential problems with the Workplan are as follows:

1. The Workplan does not provide the Environment Department with individual Solid Waste Management Unit (SWMU) sampling plans.
2. The Workplan includes no mechanisms for determining the vertical extent of contamination at any site, and particularly avoids deep surface investigation at sites where disposal was associated with a saturated waste stream (e.g., septic tanks, drain lines, etc.).

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3. Chemical analyses are limited to semi-volatiles in spite of the fact that data do not appear to be available regarding the nature of the waste streams which produced the SWMUs.
4. Sites which do not include contamination at the surface are designated as candidates for No Further Action. Such sites include soils under Trinity Drive, parking lots, commercial and residential structures. The AIP staff recommends against this conclusion.
5. The Workplan establishes acceptable levels of residual contamination in part based on the zoning size of the property in question. Contaminant concentrations are averaged over this area. In contrast, the proposed Subpart S regulations (as well as historical RCRA practice) assume direct ingestion of the soil left in place at the zone of highest contamination.

The complete AIP staff recommendations are attached. If you have any questions, please contact Danny Katzman of my staff at 827-4313.

Sincerely,



Kathleen M. Sisneros, Director
Water and Waste Management Division

KMS/bas

cc: Neil Weber, DOE Oversight Bureau Chief
Bruce Swanton, DOE/LANL Program Manager
RCRA Technical Enforcement Group
Barbara Driscoll, EPA Region VI
File, LANL, Red, '92