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LAW L
 OU 1078

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October 7, 1992

William Honker, Chief
 RCRA Permits Branch
 EPA Region 6
 1445 Ross Ave.
 Dallas, TX 75202-2733

Re: NOD for OU 1078 RFI Work Plan

Dear Mr. Honker:

My staff has reviewed EPA's Notice of Deficiency (NOD) for the Los Alamos National Laboratory (LANL) Operable Unit 1078 (OU 1078) RFI Work Plan. The NOD contains a list of Solid Waste Management Units (SWMUs) that EPA has approved for No Further Action (NFA) as well as conditions that still need to be met for other SWMUs nominated for NFA.

The Hazardous and Radioactive Materials Bureau (HRMB) agrees with the NFA nomination for most of the SWMUs listed in the NOD, however, our review of the Work Plan and the NOD raised concerns regarding the EPA's acceptance of NFA for three (3) SWMUs listed in the NOD. The following SWMUs from that list need more complete documentation of historical use and/or fate of potential releases, or sampling should be required.

SWMU 1-006j, TA-1-53 Storm Drain and Outfall should be sampled because of the possibility that releases occurred from oil drums stored behind S Building. It is also unclear whether any of the "Hillsides Sampling Plans" will effectively sample the canyon wall beneath the SWMU.

SWMU 1-006q, TA-1-64 Storm Drain and Outfall should be sampled for hazardous constituents because a photographic laboratory and silver-soldering operation were contained in T Building which was served by this drain and outfall. Previous sampling at this SWMU apparently only targeted radioactive contamination.

SWMU 1-006s, TA-1-46 Storm Drain and Outfall should be sampled for hazardous contamination. This drain and outfall also served T Building which housed a photographic laboratory and silver-soldering operation.

There are also a number of SWMUs nominated for NFA that are not specifically addressed in the NOD. Those SWMUs all require more complete documentation of historical use in order to justify NFA. In addition, application of the codisposal/colocation hypothesis

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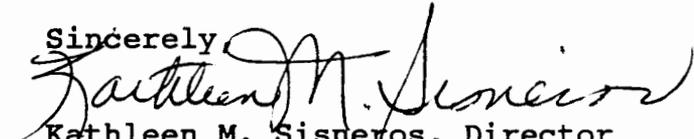
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described in the OU 1078 Work Plan appears intended to allow for NFA nomination for SWMUs or SWMU aggregates based on results obtained from separate, and not necessarily similar, physical settings. Any sampling that is done in attempt to validate the codisposal/colocation hypothesis would be considered as an academic exercise by the NMED, and not applicable for NFA consideration for SWMUs or SWMU aggregates that have not been uniquely sampled.

If you would like to discuss any of these concerns or have any questions, please contact Danny Katzman of my staff at (505) 827-4313 or 655-7127.

Sincerely



Kathleen M. Sisneros, Director
Water and Waste Management Division

cc: Jerry Bellows, DOE Los Alamos Area Office
Ed Horst, Manager, RCRA Enforcement
Barbara Hoditschek, Manager, RCRA Permits
File, LANL, Red '92

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