



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

Handwritten signatures and initials

SEP 28 1993

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

Re: RFI Work Plan for OU 1098
Notice of Deficiency
Los Alamos National Laboratory NM0890010515

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has reviewed the RCRA Facility Investigation (RFI) Work Plan for Operable Unit 1098 (OU 1098), and found it to be deficient. Enclosed are a list of deficiencies. You have thirty (30) days to respond in full to all deficiencies.

Should you require additional information, please contact Barbara Driscoll at (214) 655-7441.

Sincerely,

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

Enclosure

cc: Benito Garcia, NMED
Al Tiedman, ADO, LANL, MS-A120

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List of Deficiencies

General Comments:

1. The schedule for submittal of the RFI Report is not acceptable considering that RFI field work is to be completed on 12/15/95. The RFI Report must be submitted in a timely fashion. In addition, the schedule for any phased report submittals should also be included in the overall schedule.

2. It is unclear from a comparison of the text and tables whether use of EPA Method 6010, ICP and EPA Method 7470, Cold Vapor means that analysis will be conducted for only total chromium and mercury or for all potential analytes using the above methods. LANL shall clarify what analysis is being proposed.

3. Chapter 6, p. 6-2 and Chapter 7, Section 7.1-1 - It is not appropriate to base analysis on a set of indicator constituents. In Chapter 7.7-1 text indicates that only 20% of the samples will be analyzed for SVOCs, VOAs, inorganics and pesticides. Were pesticides used or stored at these Technical Areas? Sample reduction should only be based on process knowledge or previous sampling results with approval from EPA. Following initial sampling a reduction in analysis may be requested based on results of the phase I sampling.

4. All Subsurface Sampling - Samples should be collected at a preset interval if screening does not detect radioactivity or organics. Samples may be collected based on lithology and visual observation within each preset interval. All core samples should be screened with a PID or FID.

5. In future workplans, for ease in reviewing it would be helpful if LANL would combine SWMU descriptions, history and sampling plans in one section when these units are being investigated at the same time (i.e. Section 7.10 and 7.11).

6. No Further Action Criteria:

NFA Criterion 2 - Unless the permit addresses corrective action for any releases prior to permitting this is not a reason for NFA.

NFA Criterion 3 - The potential release site has been properly closed. This must be defined as being certified or approved by a regulatory agency.

NFA Criterion 4. That a release has not occurred nor is likely to occur from an PRS is a reason for NFA. Institutional control is not a reason for NFA.

All of the sites discussed in Chapter 8 for NFA need not be added to the HSWA permit for investigation.

Specific Comments:

1. 7.1.1 RFI Data Needs, p. 7.1-1 -

a. Change key field objective #2 to read "Define the extent and maximum concentration of constituents...".

b. For all baseline samples taken in Los Alamos Creek downstream from SWMU 2-006(b) analysis should be conducted for Appendix IX.

2. 7.5.3.2 Surface Sampling, p. 7.5-6 and 7.5.3.3 Subsurface Sampling, p. 7.5-7 -

a. Surface and subsurface sampling should be for all RCRA metals using 6010 and not just chromium.

b. If spills were common around the acid pit then more than 2 samples may be appropriate, and the subsurface borehole should probably be slanted under the pit.

3. 7.6.3.1 Surface Sampling, p. 7.6-4 - Could an X-ray Fluorescence instrument be used to help screen this area?

4. 7.7.2 Sampling Objectives and Potential Contaminants, p. 7.7-4 -
An effort should be made to physically locate and sample any outfall from SWMUs 2-006(c) and 2-006(d). Text indicates that engineering diagrams were reviewed; however, there should be a field check and attempt to locate any outfalls not indicated in engineering drawings.

5. 7.15.3.3 Subsurface Sampling, p. 7.15-5 - Borings should be placed as close to SWMU 41-002(a) as possible, or angled under the tank to investigate for potential contamination.

6. 7.16.3.2 Surface Sampling, p. 7.16-4 - Two of the samples collected from the area where the sump is located should be collected at a depth of 2-4 feet.