



Department of Energy
Field Office, Albuquerque
Los Alamos Area Office
Los Alamos, New Mexico 87544

001 29 1993

Barbara Driscoll
RCRA Permits Branch
Hazardous Waste Management Division
U. S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

Dear Ms. Driscoll:

On September 30, 1993, this office received a Notice of Deficiency (NOD), dated September 28, 1993, for the Resource Conservation and Recovery Act (RCRA) Facility Investigation Work Plan for the Los Alamos National Laboratory Operable Unit 1098, with a list of deficiencies enclosed.

Enclosed is the Department of Energy's response to this NOD. If you have any questions, please call me at 505-665-7203.

Sincerely,

Theodore J. Taylor
Program Manager
Environmental Restoration Program

LESH:3TT-013

Enclosure

cc w/enclosure:

K. Sisneros
NMED
P. O. Box 26110
Santa Fe, NM 87502
S. Slaten, ES&H, LAAO
T. Taylor, ES&H, LAAO
K. Bitner, ERPO, AL

cc w/o enclosure:

R. Harris, EM-452, HQ
J. Shipley, EE-AETO, LANL,
MS-F643
T. Gunderson, EM-DO, LANL,
MS-J591
R. Vocke, EM-13, LANL,
MS-M992
D. Sankey, FIN-18, LANL,
MS-A107



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TL

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violation.

Document Titles:

RFI Work Plan for Operable Unit (OU) 1098

Name:

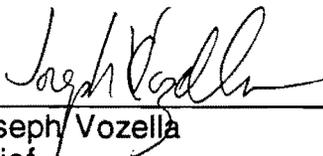


Date:

10/28/93

Allen J. Tiedman
Associate Director for Operations
Los Alamos National Laboratory

Name:



Date:

10/29/93

Joseph Vozella
Chief
Environmental Safety & Health Branch
Los Alamos Area Office

General Comments:

Comment 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."

Response: The schedule has been changed to show that the Phase I Report/Phase II Work Plan will be submitted seven months after completion of field work (see attachment). This will allow sufficient time for receiving and evaluating all Phase I data. The Phase I RFI Report will be submitted to EPA by 30 April 1996. The CMS Plan start date of 23 January 1997 remains unchanged, however, to allow for the Phase 2 RFI to be completed.

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Response: Analyses for the baseline characterization will be done for all RCRA metals using EPA method 6010, ICP and for mercury using EPA Method 7470. The Work Plan text has been changed accordingly.

Comment 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 indicated that only 20% of the samples will be analyzed for SVOCs, VOAs, inorganic 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."

Response: It is possible that pesticides were specifically used or were contained in products used as additives to the cooling tower at TA-2. Aerosol transport and blowdown from the cooling tower may have affected any area within the OU both up canyon and down canyon. Therefore, all baseline sampling will include pesticides.

The Work Plan text has been changed to show that all baseline-characterization samples will be analyzed for RCRA metals, Appendix IX semi-volatiles and pesticides, and the indicator contaminants for both TA-2 and TA-41 on pages 7.1-3 and 7.1-6. Additionally, stream sediment and subsurface samples collected from baseline characterization boreholes will be analyzed for VOCs where field-screening instruments (PID and FID) indicate the possible presence of VOCs. Data gathered from the baseline characterization, in conjunction with PRS-specific archival information, will be used to develop a target list of analytes for each PRS including at a minimum the list of indicator contaminants for TA-2 and TA-41 on pages 7.1-3 and 7.1-6. The target list will be sent to EPA for approval.

Comment 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."

Response: The borehole sampling approach has been changed so that at a minimum one sample will be collected from each interval as follows:

*in each of 6 baseline alluvial characterization boreholes - samples will be taken every 5 feet to 15 feet depth then every 10 feet to 35 feet depth.

*in 1 baseline intermediate characterization borehole - samples will be taken every 5 feet to 15 feet depth, every 10 feet to 35 feet depth, and every 25 feet to a total depth of approximately 400 feet.

*in SWMU-specific characterization boreholes - one to three samples will be taken within every 15-foot interval based on field screening and visual observation. Each borehole will be drilled to a total depth of 15 ft.

In addition, all core will be field screened for organics and radioactivity and examined for lithology and visual evidence of contamination. Additional samples and/or sample location within the above intervals will be adjusted based on the screening results.

Comment 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)."

Response: Future phase reports written for OU 1098 will combine SWMU descriptions, history, and sampling plans in one section for units being investigated concurrently.

Comment 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."

Response: NFA Criterion 2 will include the statement that the site has been investigated for releases prior to permitting.

NFA Criterion 3 will include regulatory documentation to show certification and/or approval by a regulatory agency.

NFA Criterion 4 will include the statement that a release has not occurred nor is likely to occur from an PRS.

The sites discussed in Chapter 8 for NFA will not be added to the HSWA permit.

Specific Comments

Comment 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."

Response: Comment 1a is accepted.

Comment 1b is addressed under the response to General Comment #2 which states that RCRA metals, and Appendix IX constituents will be analyzed for in all baseline samples.

Comment 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."

Response: Comment 2a, The list of constituents to be analyzed for at SWMU 2-004 will be changed to include all RCRA metals using EPA Method 6010.

Comment 2b, A total of five boreholes and two surface samples will be taken immediately adjacent to SWMU 2-004 (e) as shown in the revised Figure 7.5-1 (attached). The figure has been changed to label SWMU 2-004(e) as the Acid Pit. The number of samples proposed is judged to be appropriate to address the goal of confirming the presence or absence of contamination associated with this SWMU. If contaminants are confirmed, additional sampling will likely be appropriate in follow up characterization work. The two borings closest to SWMU 2-004(e) (North and South) will be slant-drilled in order to obtain samples from directly beneath the acid pit.

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

Response: X-ray fluorescence is not planned for use in Phase I sampling, because the detection limits are generally much higher than the screening action levels for the contaminants of concern. However, if chromium and/or mercury are detected at levels that exceed SALs, additional sampling may be conducted in phase II to further delineate

the area of contamination and to determine the proportion of the total chromium that is hexavalent chromium as stated on page 7.6-1. At this stage, an XRF instrument may prove useful to help locate areas of relative higher concentrations of chromium and thus guide the selection of sample locations.

Comment 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 2-005 (d). Text indicated that engineering diagrams were reviewed; however, there should be a field check and attempt to locate any outfalls not indicated in engineering drawings."

Response: An initial field survey of the exact locations of outfalls from the SWMUs referenced was conducted during the completion of the work plan. Prior to SWMU-specific sampling, a more detailed field survey will be conducted to look for all outfalls from TA-2 to attempt to locate any outfalls not indicated in the engineering drawings. If there is any indication of past or present outfalls sediments from those outfalls will be sampled. TA-2 is currently not operating but outfalls may have flowing water resulting from seepage or infiltration.

Comment 5. "7.15.3.2 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."

Response: Boreholes will be placed as close to SWMU 41-002(a) as possible assuming that no radiological anomalies are found. If anomalies are found, then borehole locations will be adjusted in order to investigate the anomalies. Given that alluvial ground water exists at shallow subsurface depths of less than 20 feet with ground water flow velocities on the order of 1200 feet per year, and that contamination, if present, is likely to have spread due to interaction with this ground water, angled boreholes are not judged to be necessary for a phase I investigation that is only designed to confirm the presence or absence of contamination.

Comment 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."

Response: Because of reconstruction of the area where the sump was located, the sump area is now covered by approximately 4 feet of fill material. If the intent of the comment is to assure that samples are obtained from a depth of 2 to 4 feet beneath the level of the ground surface where the

sump was formerly located, then boreholes would need to reach a depth of approximately 6 to 8 feet beneath the level of the present ground surface. The 2 soil samples that are to be taken at the location of the former sump are indicated on the unrevised figure 7.16-1 (attached). These soil samples will be sampled from depths of 6 to 8 feet.

TABLE EXEC-2

SCHEDULE OF PHASE I FIELD WORK (FY 94, AND FY 95) AND
TECHNICAL MEMORANDA/ WORK PLAN MODIFICATION REPORTS FOR THE TA-2 and TA- 41 RFI

Results of RFI field work will be presented in three principle documents: quarterly technical progress reports, phase reports/work plan modifications, and the RFI Report. The schedule below summarizes the future documents associated with implementation of this OU work plan that are deliverables to EPA and DOE.

| <u>Document</u> | <u>EPA</u> | <u>DOE</u> | <u>Date Due</u> |
|-----------------|------------|------------|--------------------------------|
| Monthly | X | X | 25th of the following month |
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| <u>Chapter and Section</u> | <u>Phase I Field Work</u> | <u>RFI Report Publication Date Phase I RFI Report</u> |
|----------------------------------|-------------------------------|---|
| 7.1 Baseline Characterization | Oct. 1, 1993 – Sept. 29, 1994 | |
| 7.4- 7.13 TA-2 | Oct. 1, 1993 – Sept. 29, 1995 | Apr. 30, 1996 |
| 7.14 7.16 TA-41 | Oct. 1, 1993 – Sept. 29, 1995 | |

**TABLE EXEC-3
ESTIMATED COSTS OF BASELINE ACTIVITIES AT OU 1098**

| Task | Budget* | Scheduled Start | Scheduled Finish |
|---|----------------|------------------------|-------------------------|
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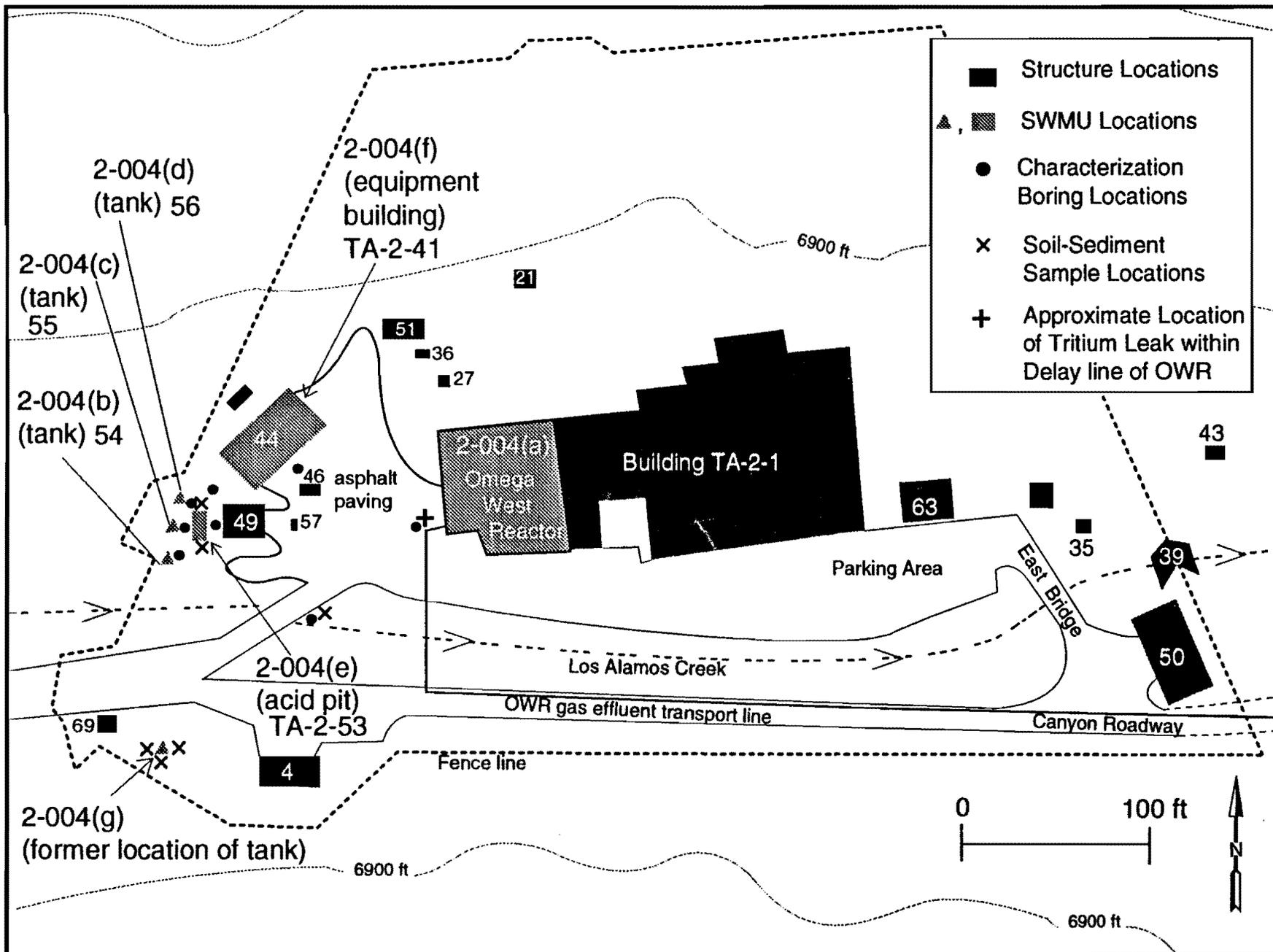


Figure 7.5-1 Proposed SWMU no. 2-004, storage pits and tanks of the Omega West Reactor, RFI boring-soil sampling locations.

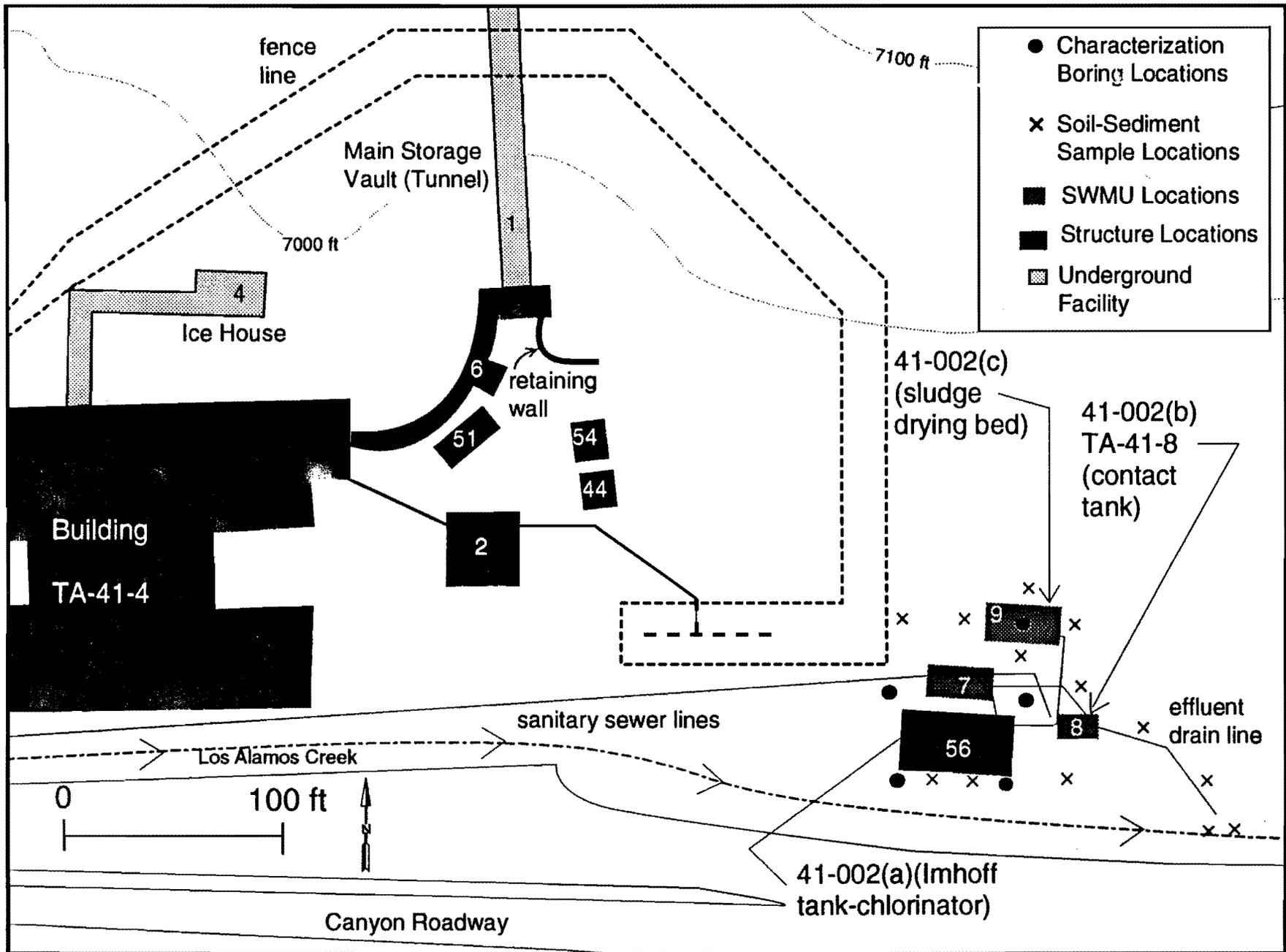


Figure 7.15-1 Proposed SWMU no. 41-002, sewage treatment plant, RFI boring-soil sampling locations.

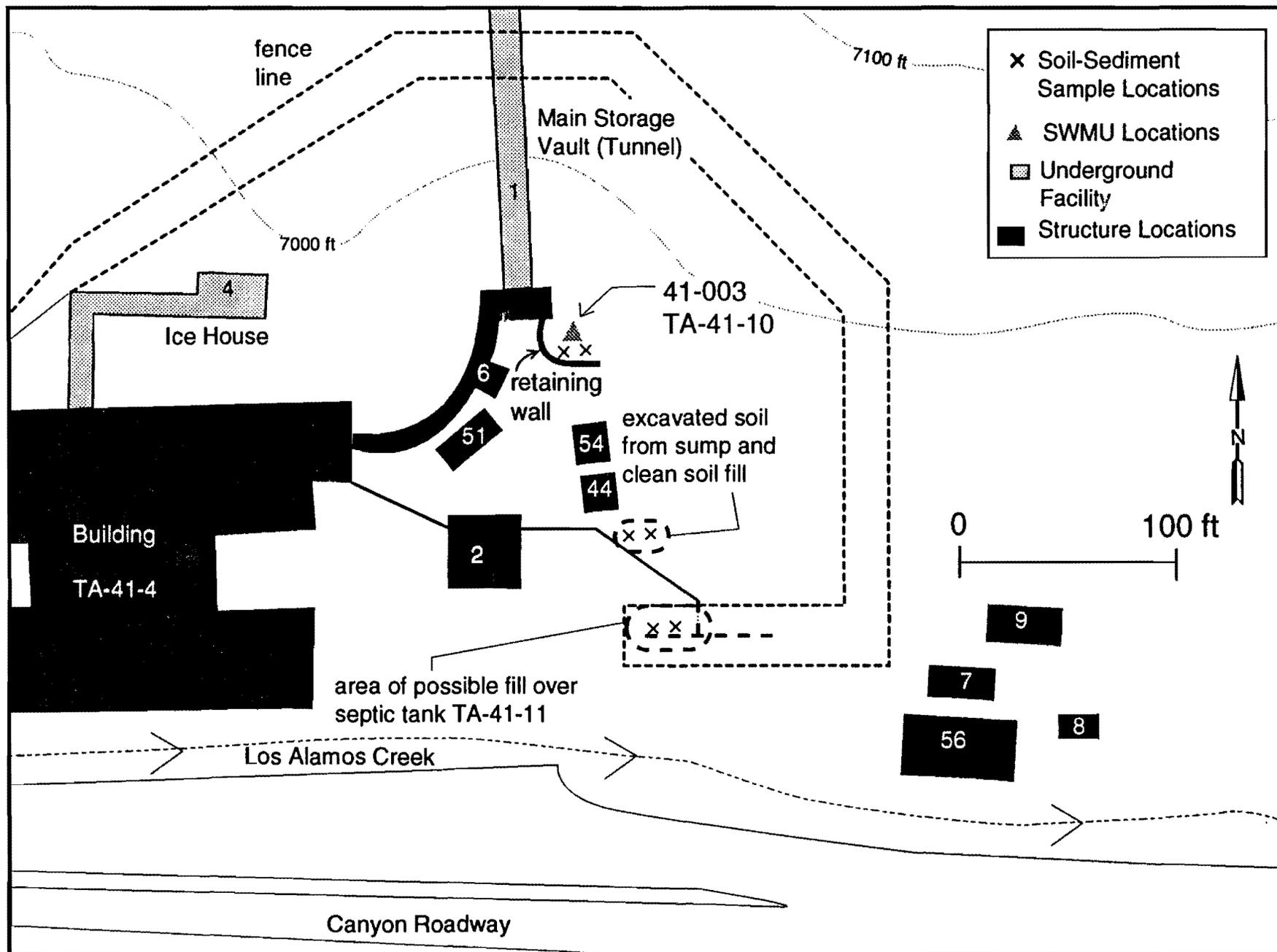


Figure 7.16-1 Proposed SWMU no. 41-003, sump, RFI soil sampling locations.

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sump was formerly located, then boreholes would need to reach a depth of approximately 6 to 8 feet beneath the level of the present ground surface. The 2 soil samples that are to be taken at the location of the former sump are indicated on the unrevised figure 7.16-1 (attached). These soil samples will be sampled from depths of 6 to 8 feet.

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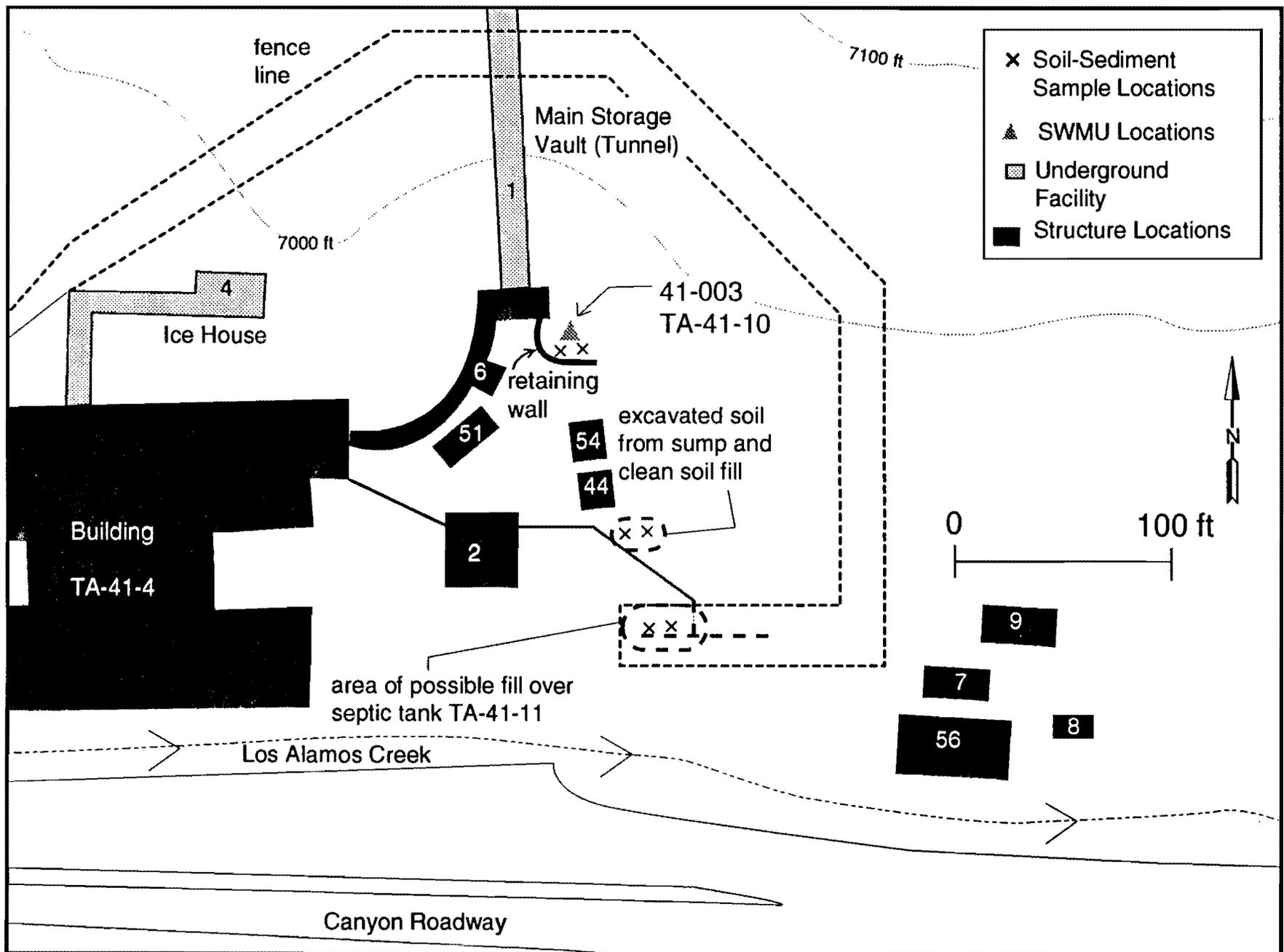


Figure 7.16-1 Proposed SWMU no. 41-003, sump, RFI soil sampling locations.

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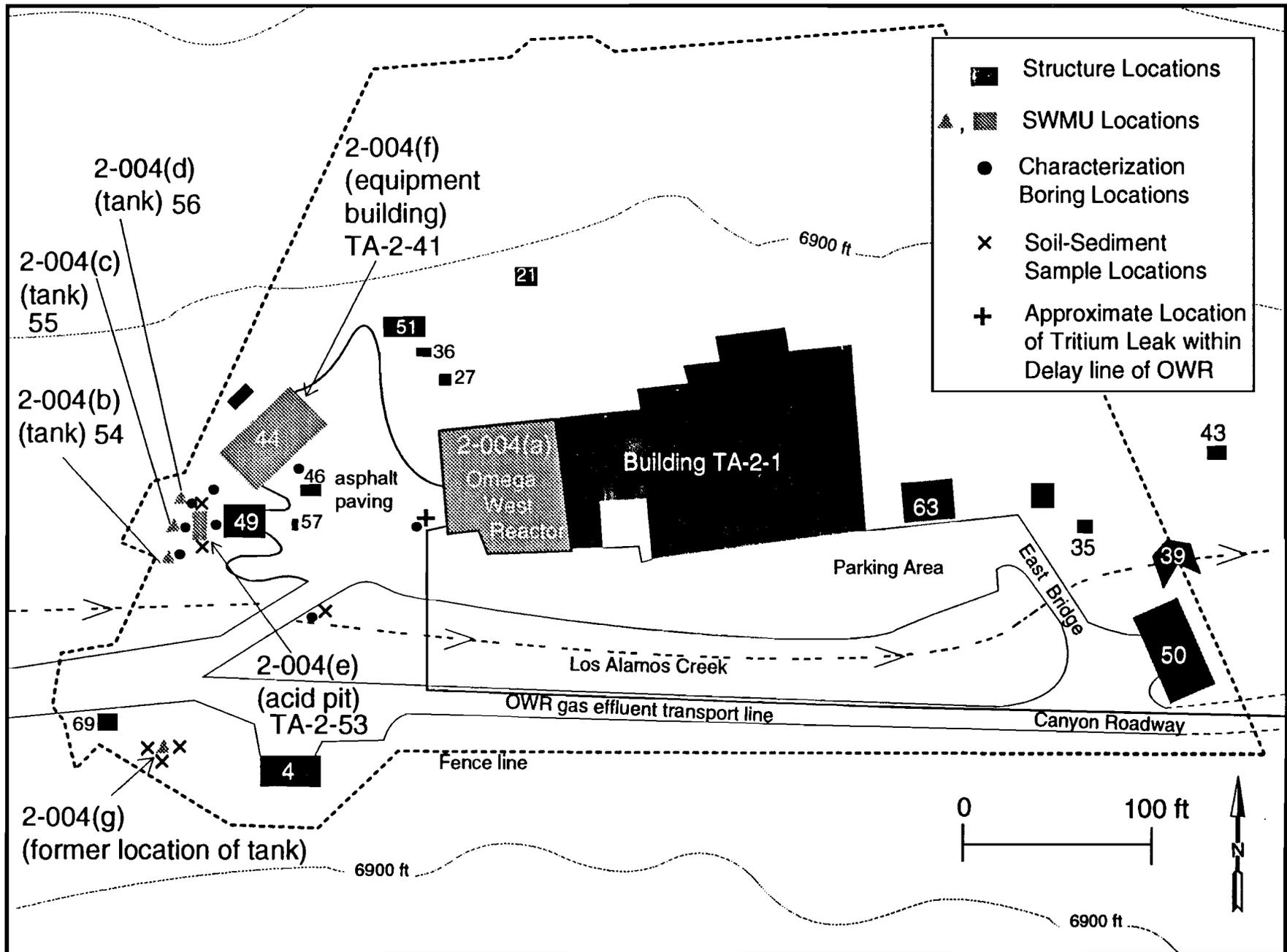


Figure 7.5-1 Proposed SWMU no. 2-004, storage pits and tanks of the Omega West Reactor, RFI boring-soil sampling locations.

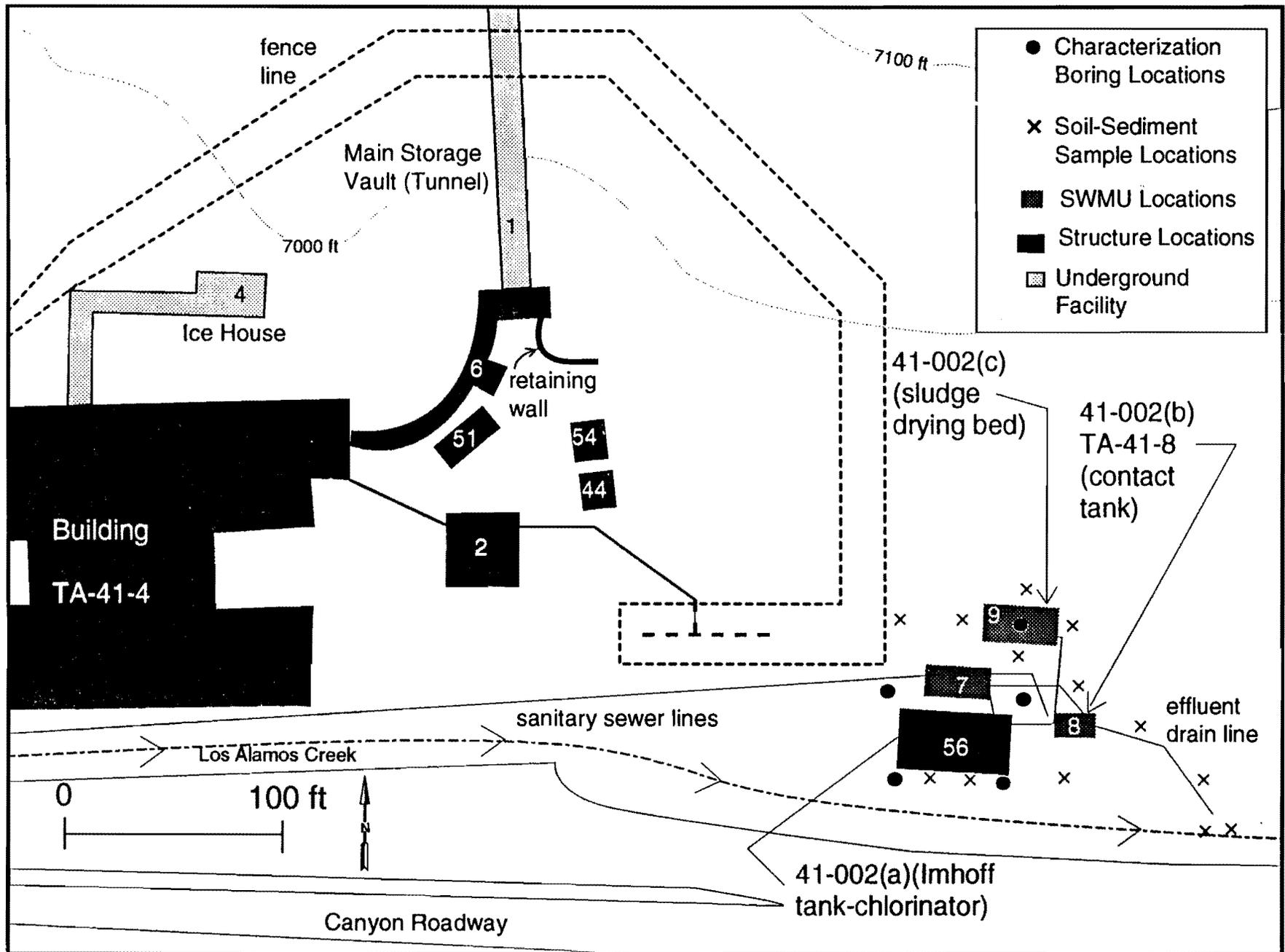


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