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LANL

March 4, 1994

Ms. Diana Webb, LANL/AIP/POC
LAAO, 528 35th Street
Los Alamos, NM 87544

RE: Review of LANL's June 1993 RCRA Facility Investigation
(RFI) Work Plan for Operable Unit [REDACTED]

Dear Ms. Webb:

The enclosed attachment provides the Department of Energy (DOE) the Agreement-In-Principle's (AIP) technical comments for the above referenced RFI Work Plan as received by the Hazardous and Radioactive Materials Bureau (HRMB) Technical Compliance Program. Thank you for your prompt attention to this matter.

Sincerely,

Bruce Swanton, Program Manager, DOE/EM Oversight
Hazardous and Radioactive Materials Bureau

BS/sy
Attachment

- cc: Benito Garcia, HRMB Bureau Chief
- Steve Alexander, HRMB
- [REDACTED]
- Neil Weber, DOE Oversight Bureau Chief
- Steve Yanicak, HRMB AIP/LANL
- File LANL/RED/94
- Glen Saums, SWQB Program Manager
- Dennis McQuillan, GWPRB Program Manager
- Barbara Driscoll, EPA Region 6
- Patrick Longmire, LANL OUPL

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MEMORANDUM

TO: Steve Alexander, Program Manager, NMED/RCRA Technical Program

THROUGH: Bruce Swanton, Program Manager, DOE/EM Oversight
Teri Davis, Supervisor, AIP/LANL

FROM: Steve Yanicak, NMED AIP/LANL

DATE: February 10, 1994

SUBJECT: Review Of LANL's Operable Unit 1098 RFI Work Plan,
submitted June 1993.

The Hazardous and Radioactive Materials Bureau (HRMB) Agreement in Principle (AIP) staff have completed the review of the operable unit (OU) 1098 RCRA facility investigation (RFI) work plan. This memo details the comments stemming from the review. For clarity, the memo contains numbered items listing comments that are keyed to a specific section number or figure in the RFI, as well as to the paragraph, e.g., Item 2. (4.4.4.4 p2). The AIP program is submitting these comments and technical recommendations to the HRMB's Enforcement/Technical Programs because of eventual New Mexico HSWA authorization.

Item

1. **SPECIFIC COMMENT** (Table EXEC-2 on page E-13) A more detailed tentative Phase I sampling schedule involving Engineering and Geophysical Surveys should be included because some SWMU's haven't been located yet and the proposed sampling plans to address them are dependent on their exact location.
2. **GENERAL COMMENT** (5.3 p1, 5.4.2 p1, and 5.6.2.3 p1) Evaluation of future land use, contaminants of concern (COC) pathways, and COC potential migration off a site should be based on the possibility of transfer of contaminants to the environment over the life of the contaminants rather than for a period of 100 years.
3. **GENERAL COMMENT** (4.4.3.1 p13 on page 4-28 p2) AIP staff strongly agree with the data needs presented here concerning the groundwater characterization of Los Alamos Canyon near TA-2 and TA-41.

4. **GENERAL COMMENT** (Table 4.4-8 on page 4-30) It is generally known that for LANL (the Pajarito Plateau region), there exists insufficient well data and too many inconsistencies with available data to produce the generalized main aquifer contours shown.
5. **SPECIFIC COMMENT** (Table 5.7-1 on page 5-25) AIP staff agree that the general data needs listed for the 1098 RFI such as tuff in-situ moisture characteristics, geologic uncertainties, delineation of fracture and fault zones, and mineralogic and chemistry characteristics of the soil/tuff are an integral part of the hydrogeologic regulatory requirements outlined in ~~Table 5.6-1 pg. 5-14 - 5-17~~ ~~RCRA Part B permit~~. Data generated by the above mentioned site-specific studies might affect or modify the geologic/hydrologic/contaminant migration pathways conceptual model for ~~Table 5.6-1 pg. 5-14 - 5-17~~ as well as the facility-wide conceptual model. The RFI data needs outlined above, are also important for the purpose of setting OU-wide data quality objectives (DQO). ~~1098 RFI it is generally unclear where and when these data needs should be included in the Phase I baseline investigations.~~ It is recommended that the RFI include an overall schedule of projects with clearly defined objectives designed to meet the deficiencies mentioned in Table 5.7-1.
6. **SPECIFIC COMMENT** In Annex I, there is no Table I.1.2 which is referred to in the text on page I-6 section I.2 p1.
7. **SPECIFIC COMMENT** (6.1.2 p1, 7.4.2 p2, 7.5.2 p2, 7.6.4 p1, 7.7.4 p1, and 7.8.4 p1) ~~It is recommended that if a site is identified as a SWMU, the SWMU should be tested for RCRA Appendix VIII or IX constituents along with suspected Rad substances.~~ It is recommended that a target indicator constituent list be selected only after Phase I sampling of all the SWMU's in the work plan and in conjunction with the baseline study.
8. **SPECIFIC COMMENT** (7.5.1 p6) ~~A 170 gallon storage tank (170 gallon UST) directly south of TA-2-1, first mentioned in 3.4 p6, is not described as a AOC/SWMU or addressed in the Phase I sampling activities. It is suggested that this tank be addressed in the RFI Phase I investigation.~~

Steve Alexander
February 10, 1994
Page 3.

SWMU'S PROPOSED FOR NO FURTHER ACTION (NFA)

9. SPECIFIC COMMENT (8.2 p1 [~~MSR 2-001, Burn Site~~]) It is recommended that ~~additional site workers from the early/late 1950's be interviewed for an archival review of this SWMU before considering it as a candidate for NFA.~~ The burn pit was mentioned to be active during the late 1940's and early 1950's, but the only site worker referenced (Glen Neely) worked from 1960 to 1976.
10. SPECIFIC COMMENT (8.6.3 [C-41-003, ~~Industrial Waste Tank~~]) It ~~is recommended that geophysical methods be used to locate or disprove the existence of this PRS before considering it as a candidate for NFA.~~
11. SPECIFIC COMMENT (8.6.4, [C-41-005, ~~CA 41-146, Fuel Tank~~]) ~~See item 10 above.~~