

File 40

APR 21 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

2361
TA-03

Mr. Jerry L. Bellows
Area Manager
Department of Energy
Los Alamos Area Office
Los Alamos, New Mexico 87544

Re: Revised Sampling and Remediation Plan for Mercury Contaminated
Soils at TA-3-30
Los Alamos National Laboratory
NM0890010515

Dear Mr. Bellows:

The Environmental Protection Agency (EPA) hereby approves your
Sampling and Remediation Plan for Mercury Contaminated Soils at
TA-3-30 dated February 16, 1993 with the enclosed modifications.
You shall immediately initiate the implementation of this approved
work plan.

This Voluntary Corrective Action may not be considered a final
remedy, and these activities when completed, will not necessarily
absolve Los Alamos National Laboratory (LANL) from further cleanup
responsibilities at this Solid Waste Management Unit (SWMU) at a
later date. LANL should follow the appropriate Class III
modification procedures for determination of a final remedy for
this SWMU.

The composite sampling approach proposed in this work plan should
only be used on a very limited basis, discrete sampling is
preferred by EPA in most cases. One of EPA's primary concerns with
the use of composite sampling is the potential lag time for
additional analysis should analysis of a composite sample indicate
the presence of Mercury above the action level, and then the
discrete subsamples making up that composite would also need to be
analyzed.



5415

If you have any questions, please contact Barbara Driscoll of my staff at (214) 655-7441.

Sincerely yours,

Allyn M. Davis, Director
Hazardous Waste Management Division

Enclosure

cc: Kathleen Sisneros, NMED
Al Tiedman, LANL, MS-A120

B Driscoll
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Modifications

1. **5.1 Data Evaluation, p. 5-2** - LANL will explain how it will determine whether the material excavated is mixed waste or not. This procedure shall be provided to EPA within fifteen (15) days of receipt of this approval letter.

2. The primary objective of this voluntary corrective action should be to remove the material contaminated with mercury from the area adjacent to the streambed as quickly as possible; therefore, the schedule presented in Section 6.0 shall be revised to indicate removal of contaminated soil immediately after completion of evaluation of all analytical results. Preparation time for the excavation work can coincide with waiting on analytical results. LANL can also drum the waste while treatment decisions are being made.

FACT SHEET
Voluntary Corrective Action Work Plan
Los Alamos National Laboratory

- * A Solid Waste Management Unit (SWMU) at Los Alamos located adjacent to a streambed was found to contain high concentrations of mercury.
- * The NMED's Surface Water Bureau requested that Los Alamos remove the mercury contaminated area, as the state has a problem with high concentrations of mercury in lakes and rivers.
- * Because this unit is also a SWMU, EPA needed to review and approve the work plan for actions at the SWMU.
- * All comments have been coordinated with NMED. NMED will issue their own approval letter.