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February 18, 1994

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

RE: Review of LANL's RCRA Facility Investigation (RFI) Work Plan
for Operable Unit (OU) 1114

Dear Ms. Webb:

The enclosed attachment provides to the Department of Energy the Agreement-in-Principle's technical comments for the above referenced RFI Work Plan as received by the Hazardous and Radioactive Materials Bureau's Technical Compliance Program.

Sincerely,

Bruce Swanton, LANL/AIP/POC, Program Manager
Hazardous and Radioactive Materials Bureau

BS/tm
Attachment

cc: Benito Garcia, HRMB Bureau Chief
Steve Alexander, Technical Compliance Program Manager
Barbara Hoditscheck, RCRA Program Manager
Neil Weber, DOE Oversight Bureau Chief
Tim Michael, DOE Oversight AIP Technical Staff
Glen Saums, SWQB Program Manager
Dennis McQuillan, GWPRB Program Manager
Barbara Driscoll, EPA Region 6
Garry Allen, LANL Project Leader OU 1114
File LANL/RED/94

LANL/OU1114/COVER LETTER



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M E M O R A N D U M

TO: STEVE ALEXANDER, RCRA TECHNICAL COMPLIANCE PROGRAM
MANAGER

THROUGH: BRUCE SWANTON, POC
AIP DOE/LANL

FROM: TIM MICHAEL, AIP

DATE: FEBRUARY 9, 1994

RE: REVIEW OF THE LOS ALAMOS NATIONAL LABORATORY RCRA
FACILITY INVESTIGATION WORK PLAN FOR OPERABLE UNIT 1114

The Hazardous and Radioactive Materials Bureau (HRMB), under the Agreement in Principle (AIP) program, has reviewed the subject Work Plan. This memo documents our review.

The RFI Work Plan for this Operable Unit (OU) was completed in July 1993. Subsequently, the EPA issued a Notice of Deficiency (NOD) dated October 29, 1993. Many of the concerns of the AIP were addressed in the NOD or in the Los Alamos National Laboratory (LANL) response dated December 3, 1993.

The OU was inspected by Tim Michael of the HRMB on January 6, 1994. In the EPA's October NOD, the EPA withheld approval of No Further Action (NFA) or Deferred Action (DA) for six Solid Waste Management Units (SWMUs) pending concurrent approval from the New Mexico Environment Department. These SWMUs were numbered:

3-056(b)	61-005	3-035(b)
3-044(a)	61-006	3-001(k)

This memo documents our inspection of these SWMUs as well as our acceptance or rejection of technical adequacy of NFA or DA proposals. There are no comments on the Work Plan except regarding Chapter 6, Potential Release Sites Recommended for No Further Action or Deferred Action. These comments are listed in the following pages.

PRSS PROPOSED FOR NO FURTHER ACTION OR DEFERRED ACTION

1. 3-001(k) Paved area on south side of Van de Graff building, TA-3-16. According to the work plan, the area was used for the storage of fresh vacuum pump oil, empty drums for salvage, empty drums to be filled with wastes, empty tar-lined 55 gallon drums for tritium storage, and a few drums containing used solvents. On inspection (1/6/94), the concrete and asphalt appeared weathered but clean.

NFA proposal acceptable to AIP.

2. 3-009(a) Fill area (30 x 300 feet) on the rim of Sandia Canyon south of the asphalt batch plant. Depth of the fill consists of soil fill generated by concrete and building materials. The area has operated from 1961 to the present. There is apparently no way to positively demonstrate that only soil fill and construction debris were deposited at this site. There is also no sampling plan designed to monitor potential discharges caused by washwaters and drainages at the asphalt batch plant. A work plan for this SWMU should be submitted as part of the asphalt batch plant aggregate in the Part II OU 1114 RFI Work Plan as described in the LANL NOD response.

NFA proposal not acceptable to AIP.

3. 3-009(d) Asphalt and metal debris located southwest of transportable building TA-3-1572. The site was screened for radioactivity by LANL.

NFA proposal acceptable to AIP.

4. 3-010(a) Mercury surface disposal from vacuum pump repair shop. Currently undergoing VCA. EPA and NMED awaiting sample results before commenting on Deferred Action (DA).

5. 3-013(c) Cable cleaning area in use from the 1960's until 1991. Kerosene was used in the cleaning operation which was done on a paved asphalt area or on a plastic lined sand bed which has been removed. Runoff flows to a storm drain outfall which will be sampled as SWMU 3-013(a).

NFA proposal acceptable to AIP.

6. 3-026(d) Sump in the basement of the Van de Graff building that received sanitary wastes and liquids from floor drains. Visual inspection by LANL indicated no leaks.

DA proposal acceptable to AIP.

7. 3-035(b) Underground storage tank. Tank was removed and site was closed September 1993.

NFA proposal acceptable to AIP.

8. 3-044(a) Decommissioned drum storage located southeast of TA-3-70, near asphalt batch plant.

DA proposal acceptable to AIP.

9. 3-056(b) Decommissioned drum storage located southeast of TA-3-70, near asphalt batch plant.

DA proposal acceptable to AIP.

10. 60-006(c) Septic system. This is listed as a duplicate of 60-006(a), for which a sampling plan is listed in Section 5.6.4.

NFA acceptable to AIP.

11. 61-005 Active Los Alamos County/Laboratory landfill.

DA proposal acceptable to AIP.

12. 61-006 Active waste oil recycling area within Los Alamos County/Laboratory landfill.

DA proposal acceptable to AIP.

If you have any questions on this review, please contact Tim Michael of the New Mexico Hazardous and Radioactive Materials Bureau at (505) 827-4308.