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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Recd 3/8/95

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

MAR 08 1995

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

RE: Additional Sampling Plans for Operable Unit 1114
Los Alamos National Laboratory (NM0890010515)

Dear Mr. Vozella:

The Environmental Protection Agency has reviewed the Sampling and Analysis Plan for Operable Unit 1114 dated March 15, 1994, which addresses solid waste management units (SWMUs) 3-038, 3-026(a) and 3-037. Attached is a list of deficiencies related to this sampling plan, and the additional Notice of Deficiency Response for OU 1114 dated March 2, 1994. Los Alamos National Laboratory should respond to these deficiencies within 45 days from receipt of this letter.

Should you have any questions, please feel free to contact Ms. Barbara Driscoll at (214) 665-7441.

Sincerely,

A handwritten signature in dark ink, appearing to read "William K. Honker".

William K. Honker, P.E., Chief
RCRA Permits Branch

Enclosure

cc: Mr. Benito Garcia
New Mexico Environment Department
Mr. Jorg Jansen
Los Alamos National Laboratory, MS M992



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**Comments on Additional Workplans
Operable Unit 1114**

1. In EPA's Notice of Deficiency dated October 29, 1993, deficiency number 23 indicated that Los Alamos National Laboratory (LANL) needed to supply sampling plans for the portions of SWMU 3-038 which were not previously removed or sampled. In LANL's submittal dated March 15, 1994, sampling plans address more than what EPA has requested. LANL should sample the waste line remaining under the roadways when roadwork makes sampling available. The sampling plans for the waste lines will be approved upon receipt of a schedule for sampling.

2. A review of the information provided for SWMU 3-037 indicates that a release has occurred from the unit. LANL has not provided information related to when this building will be decommissioned. EPA will not make a decision on deferral of this unit until this information is provided. LANL should also provide all analytical data for the sampling which occurred at this site in 1989 and 1991. The data may be presented in a table for any constituent which is above the detection limit. All Extraction Procedure Toxicity data should also be provided.

3. LANL may request a Class 3 permit modification for removal of the following units from the HSWA portion of the RCRA permit:

3-035(b)
3-001(k)
3-009(a, d)

4. LANL may defer action at the following sites until decontamination and decommissioning:

3-056(b)
3-044(a)
61-005
61-006
3-028
3-026(d)

5. In the future, submittals with revised text where the rewrites are more than a few lines, the new material does not need to be underlined. Underlining makes it difficult to read the text. No response needed.