

# Los Alamos National Laboratory

ENVIRONMENTAL RESTORATION

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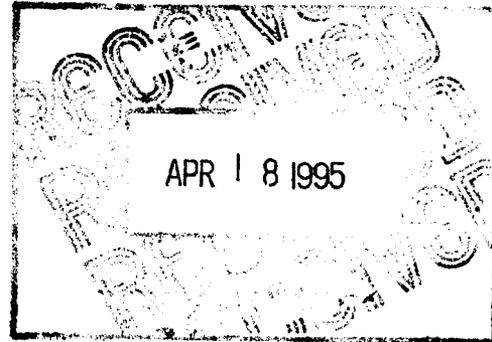
U. S. Department of Energy  
Los Alamos Area Office, MS A316  
Los Alamos, New Mexico 87544  
505-665-7203  
FAX 505-665-4504

APR 12 1995

Date:

Refer to: EM/ER:95-148

Ms. Barbara Driscoll  
RCRA Permit Branch  
US Environmental Protection Agency, Region 6  
1445 Ross Ave., Suite 1200  
Dallas, TX 75202-2733



Dear Ms. Driscoll:

**SUBJECT: NOTICE OF DEFICIENCY (NOD) RESPONSE FOR OPERABLE UNIT 1114**

Enclosed please find the Los Alamos National Laboratory's (the Laboratory's) response to a NOD received March 8, 1995. Both of the Environmental Protection Agency's comments are listed in bold, followed by the Laboratory's response. Also enclosed is a signed certification form.

1. **Solid Waste Management Unit (SWMU) 3-038(a,b). The Laboratory should sample the waste line remaining under the roadways (intersection of Diamond Drive and West Jemez Road), when roadwork makes sampling available. The sampling plans for the waste lines will be approved upon receipt of a schedule for sampling.**

There currently is no road or underground utility work scheduled to be performed at the above mentioned intersection in the foreseeable future. However, emergency repairs to utilities is a possibility at anytime, and utility workers may potentially be exposed to contaminants if they exist. Therefore, we will be sampling to determine if concentrations of potential contaminants of concern exist above screening action levels at this site.

The sampling is scheduled to start the first quarter of FY96. Adherence to this schedule will largely depend on Environmental Restoration Project budget allocations for FY96. A proposed schedule is enclosed as Addendum A.

2. **SWMU 3-037. The Laboratory has not provided information related to when this building (TA-3-66) will be decommissioned. EPA will not make a decision on deferral of this unit until this information is provided. The Laboratory 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.**

The Decontamination and Decommissioning program does not have any decommissioning activities scheduled for this building in their current 5 year plan. It is suspected that this building will be in use for at least the next 10-20 years.



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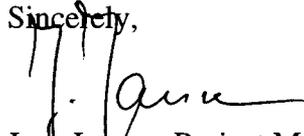
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The tables listing the analytical data collected from this site in 1989 and 1991 is enclosed as Addendum B.

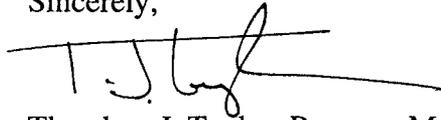
Should you have any questions, please contact Garry Allen, the Field Project Leader responsible for these three sites, at (505) 667-3394, or Bonnie Koch at (505) 665-7202.

Sincerely,



Jorg Jansen, Project Manager  
Environmental Restoration

Sincerely,



Theodore J. Taylor, Program Manager  
Los Alamos Area Office

JJ/TT/bp

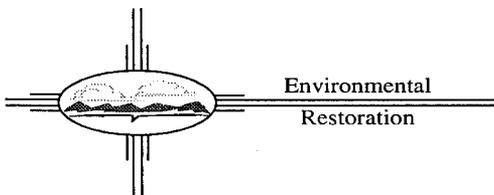
Enclosures: (1) Addendum A  
(2) Addendum B  
(3) Signed Certification Form

Cy: (w/enc.)

H. Decker, NMED-AIP, MS J993  
B. Garcia, NMED-HRMB  
D. Griswold, ERD, AL, MS A906  
J. Jansen, EM/ER, MS M992  
B. Koch, AAMEP, LAAO, MS A316  
E. Merrill, EM-453, HQ  
T. Taylor, AAMEP, LAAO, MS A316  
B. Swanton, NMED-HRMB  
J. White, ESH-19, MS K498  
RPF, MS M707

Cy w/o enc.):

T. Baca, EM, MS J591  
G. Rael, ERD, AL, MS A906  
W. Spurgeon, EM-453, HQ  
J. Vozella, AAMEP, LAAO, MS A316  
EM/ER File, MS M992  
LAAO File, MS A316



## CERTIFICATION

I certify under penalty of law that these documents 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 Title:

Notice Of Deficiency (NOD) Response For Operable Unit 1114

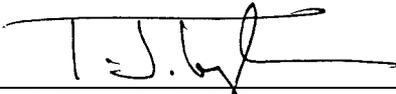
Name:

  
Tom Baca, Program Director  
Environmental Management  
Los Alamos National Laboratory

Date:

4/11/95

Name:

  
Joseph Vozella, Chief  
Environment, Safety, and Health Branch  
DOE-Los Alamos Area Office

Date:

4/11/95

or

Theodore J. Taylor  
Program Manager  
Environmental Restoration Program  
DOE-Los Alamos Area Office

### Addendum A

FU 1 Diamond Dr. and West Jemez Rd. Investigation Schedule

Name	Duration	Scheduled Start	Scheduled Finish	1995				1996				1997				1998				1999		
				Q1	Q2	Q3	Q4	Q1	Q2													
<b>TA-3: Conduct WP#1 Phase I Diamond/Jemez Waste Line Field Investigations</b>	227d	Oct 1 '95	Aug 13 '96																			
TA-3: Start WP#1 NOD Field Operations for Diamond/Jemez Waste Line [PRSs 3-038(a,b)]	0d	Oct 1 '95	Oct 1 '95					◆														
<b>TA-3: Prepare for WP#1 NOD Diamond/Jemez Waste Line Field Operations</b>	17d	Oct 2 '95	Oct 24 '95																			
<b>TA-3: Conduct WP#1 NOD Diamond/Jemez Waste Line Field Operations</b>	50d	Oct 25 '95	Jan 2 '96																			
<b>TA-3: Perform WP#1 NOD Diamond/Jemez Waste Line Sample Analysis</b>	160d	Nov 22 '95	Jul 2 '96																			
<b>TA-3: Manage WP#1 NOD Diamond/Jemez Waste Line Investigation Derived Waste</b>	190d	Nov 22 '95	Aug 13 '96																			
<b>TA-3: Perform WP#1 NOD Diamond/Jemez Waste Line Data Assessment</b>	190d	Nov 22 '95	Aug 13 '96																			
TA-3: WP#1 NOD Diamond/Jemez Waste Line Field Work Complete [PRS 3-038(a)]	0d	Aug 13 '96	Aug 13 '96									◆										
<b>TA-3: Prepare WP#1 NOD Diamond/Jemez Waste Line RFI Report [PRS 3-038(a)]</b>	209.9d	Jun 19 '96	Apr 8 '97																			

Date 3/30/95

Critical



Noncritical



Progress



Milestone



Summary



Rolled Up



# Addendum B

## RESULTS FROM CONCRETE AND SOIL SAMPLES COLLECTED IN 1989 FROM THE AREA ASSOCIATED WITH THE RADIOACTIVE LIQUID WASTELINE IN THE BASEMENT OF TA-3-66

Customer ID Number	Lab ID Number	Date Collected	VOC	SVOC	EP TOX Metals	Results (mg/L)	Radio-activity	Result
89.00248	89.13686	7/05/89	None Detected	NA	NA	NA	NA	NA
89.00249	89.13687	7/05/89	None Detected	NA	NA	NA	NA	NA
89.00250	89.13688	7/05/89	NA	None Detected	NA	NA	NA	NA
89.00251	89.13689	7/05/89	NA	None Detected	NA	NA	NA	NA
89.00252	89.13694	7/05/89	NA	NA	Ag As Ba Cd Cr Hg Pb	0.060 ± 0.02 <0.2 0.5 ± 0.05 <0.09 0.38 ± 0.04 0.00061 ± 0.00020 0.5 ± 0.05	NA	NA
89.00253	89.13695	7/05/89	NA	NA	Ag As Ba Cd Cr Hg Pb	0.030 ± 0.02 <0.2 0.7 ± 0.07 <0.09 0.4 ± 0.04 0.00054 ± 0.00020 0.8 ± 0.08	NA	NA
89.00256	89.13696	7/05/89	NA	NA	Ag As Ba Cd Cr Hg Pb	<0.020 <0.2 1.0 ± 0.1 <0.09 0.1 ± 0.02 0.00028 ± 0.00020 0.6 ± 0.06	NA	NA
89.00254	89.13692	7/05/89	NA	NA	NA	NA	Alpha Beta Gamma	23 ± 5 pCi/L 48 ± 5 pCi/L 20 ± 2 pCi/g
89.00255	89.13693	7/05/89	NA	NA	NA	NA	Alpha Beta Gamma	13 ± 3 pCi/L 47 ± 5 pCi/L 17 ± 2 pCi/g

NA = Not Applicable; no analyses performed for specific analyte

## Addendum B

RESULTS FROM CONCRETE AND SOIL SAMPLES COLLECTED IN 1991  
FROM THE AREA ASSOCIATED WITH THE RADIOACTIVE LIQUID WASTELINE IN THE BASEMENT OF TA-3-66

Location ID - Depth	Lab ID Number	Date Collected	SVOC	Result (ug/kg)	Total Lead (ug/g)	Total U (ug/g)	TCLP Metals	Results (mg/L)
PF-66-1 (SE corner) Concrete	91.03288	4/19/91	Bis(2-ethylhexyl)phthalate Di-n-butyl phthalate	1900 ± 570 2500 ± 750	NA	2 ± 0.2	Ag As Ba Cd Cr Hg Pb Se	0.017 ± 0.010 <0.02 0.3 ± 0.03 <0.01 <0.01 <0.0002 <0.05 <0.02
PF-66-1 8 in. soil	91.03289	4/19/91	Bis(2-ethylhexyl)phthalate Di-n-butyl phthalate	450 ± 135 650 ± 195	77 ± 15	10.9 ± 1.1	Ag As Ba Cd Cr Hg Pb Se	0.117 ± 0.012 <0.02 0.8 ± 0.08 <0.01 <0.01 0.00045 ± 0.0002 <0.05 <0.02
PF-66-1 (QA/QC) 8 in. soil	91.03291	4/19/91	Bis(2-ethylhexyl)phthalate	890 ± 267	NA	13.4 ± 1.3	Ag As Ba Cd Cr Hg Pb Se	0.037 ± 0.010 <0.02 0.6 ± 0.06 <0.01 <0.01 <0.0002 <0.05 <0.02
PF-66-1 3 ft soil	91.03290	4/19/91	Bis(2-ethylhexyl)phthalate Di-n-butyl phthalate	1900 ± 570 2900 ± 870	46 ± 9.2	4.5 ± 0.5	Ag As Ba Cd Cr Hg Pb Se	0.338 ± 0.034 <0.02 0.7 ± 0.07 <0.01 <0.01 0.0006 ± 0.0002 5.0 ± 0.50 <0.02
PF-66-1 (QA/QC) 3 ft soil	91.03292	4/19/91	Bis(2-ethylhexyl)phthalate Butylbenzyl phthalate Di-n-butyl phthalate	2900 ± 870 400 ± 120 4600 ± 1380	NA	3.9 ± 0.4	Ag As Ba Cd Cr Hg Pb Se	0.413 ± 0.041 <0.02 0.9 ± 0.09 <0.01 <0.01 0.0007 ± 0.0002 2.0 ± 0.20 <0.02

NA = Not Applicable; no analyses performed for specific analyte

## Addendum B

RESULTS FROM CONCRETE AND SOIL SAMPLES COLLECTED IN 1991  
FROM THE AREA ASSOCIATED WITH THE RADIOACTIVE LIQUID WASTELINE IN THE BASEMENT OF TA-3-66, CONTINUED

Location ID - Depth	Lab ID Number	Date Collected	SVOC	Result (ug/kg)	Total Lead (ug/g)	Total U (ug/g)	TCLP Metals	Results (mg/L)
PF-66-2 (NW center) Concrete	91.03293	4/19/91	None detected		NA	2 ± 0.2	Ag As Ba Cd Cr Hg Pb Se	0.013 ± 0.010 <0.02 0.3 ± 0.03 <0.01 <0.01 <0.0002 <0.05 <0.02
PF-66-2 8 in. soil	91.03294	4/19/91	Di-n-butyl phthalate	510 ± 153	48 ± 9.5	11.1 ± 1.1	Ag As Ba Cd Cr Hg Pb Se	0.030 ± 0.010 <0.02 0.7 ± 0.07 <0.01 <0.01 <0.0002 <0.05 <0.02
PF-66-2 3 ft soil	91.03295	4/19/91	None detected		120 ± 24	8.7 ± 0.9	Ag As Ba Cd Cr Hg Pb Se	0.037 ± 0.010 0.02 0.7 ± 0.07 <0.01 <0.01 <0.0002 <0.05 <0.02
PF-66-3 (NE corner) Concrete	91.03296	4/19/91	None detected		NA	2.2 ± 0.2	Ag As Ba Cd Cr Hg Pb Se	0.016 ± 0.010 0.02 0.3 ± 0.03 <0.01 <0.01 <0.0002 <0.05 <0.02
PF-66-3 8 in. soil	91.03297	4/19/91	None detected		220 ± 45	22.3 ± 2.2	Ag As Ba Cd Cr Hg Pb Se	0.017 ± 0.010 0.02 0.8 ± 0.08 <0.01 <0.01 <0.0002 <0.05 <0.02

NA = Not Applicable; no analyses performed for specific analyte

## Addendum B

RESULTS FROM CONCRETE AND SOIL SAMPLES COLLECTED IN 1991  
FROM THE AREA ASSOCIATED WITH THE RADIOACTIVE LIQUID WASTELINE IN THE BASEMENT OF TA-3-66, CONTINUED

Location ID - Depth	Lab ID Number	Date Collected	SVOC	Result (ug/kg)	Total Lead (ug/g)	Total U (ug/g)	TCLP Metals	Results (mg/L)
PF-66-3 5 ft. soil	91.03298	4/19/91	None detected		250 ± 50	17.1 ± 1.7	Ag	<0.010
							As	<0.02
							Ba	0.5 ± 0.05
							Cd	<0.01
							Cr	<0.01
							Hg	<0.0002
							Pb	0.1 ± 0.01
							Se	<0.02
PF-66-Clay (clay = mixture of concrete and soil cuttings from holes 1,2, and 3)	91.03299	4/19/91	None detected		NA	2 ± 0.2	Ag	0.030 ± 0.010
							As	0.02
							Ba	0.4 ± 0.04
							Cd	<0.01
							Cr	<0.01
							Hg	<0.0002
							Pb	<0.05
							Se	<0.02

NA = Not Applicable; no analyses performed for specific analyte