

JFA 03



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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

August 26, 1996

Mr. G. Thomas Todd
DOE/LAAO
538 35th Street
Los Alamos, New Mexico 87544

Dear Mr. Todd:

**RE: Disapproval of the RCRA Facility Investigation Workplan
Operable Unit 1114
Los Alamos National Laboratory (NM0890010515)**

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has received the United States Environmental Protection Agency's (EPA) review of the Department of Energy/Los Alamos National Laboratory's (DOE/LANL) Resource Conservation and Recovery Act Facility Investigation (RFI) Workplan for Operable Unit (OU) 1114 and the Response to the Notice of Deficiency (NOD). NMED HRMB agrees that the Workplan and Response are insufficient. Remaining deficiencies in the Workplan and the Response to the NOD are in Attachment A. DOE/LANL have 60 days to submit a new workplan which addresses the concerns of this disapproval.

Should you or your staff have any questions concerning this disapproval, please contact either Mr. Benito Garcia or Ms. Barbara Hoditschek my staff at 505/827-1557 or 505/827-1561.

Sincerely,

Ed Kelley Ph. D., Director
Water and Waste Management Division
New Mexico Environment Department

cc: J. Vozella, DOE LAAO
T. Taylor, DOE LAAO
J. Jansen, LANL
D. Neleigh, EPA
Neil Weber, NMED DOE OB
R. Dinwiddie, NMED HRMB
T. Davis, NMED HRMB
LANL HSWA OU1114 File



ATTACHMENT A
Disapproval of the RFI Workplan for OU 1114
Los Alamos National Laboratory

General Comment:

1. LANL needs to provide exact dates when RFI Reports will be provided to NMED for the sites discussed in this RFI Work Plan. The schedule for these sites will need to be approved by NMED.
2. **Page 1, Deficiency 1:** The reviewer is not familiar with the specifics of LANL-ER-SOP 01.04, R2, ICN, Sample Control and Field Documentation; however, LANL must provide soil descriptions and indicate the PID/FID readings for all surface samples.

Specific Comments Related to the NOD Response:

3. **Page 2, Response 1:** The response provided to Deficiency #1 did not adequately address all concerns. LANL shall collect a sample at the outfall to catchment basin 1 even if the material appears to be bedrock and a sample at the head of catchment basin no. 2.
4. **Page 3; Response 2:** The response provided to Deficiency #2 did not adequately address all concerns. LANL shall collect 2 additional samples at each sampling location. One sample shall be 3 feet below the soil-interface and the other sample at 5 feet.
5. **Page 4; Response 3:** LANL shall analyze the 3 soil sampling locations after the outfall for trichloroethane and trichloroethene. LANL shall analyze the 3 soil sampling locations after the weir for trichloroethane and trichloroethene.
6. **Page 5; Response 4:** The response provided to Deficiency #4 did not adequately address all concerns. LANL must take 2 vertical soil samples per boring at the outfall area, with a minimum vertical depth of 5 feet.
7. **Page 6; Response 5A:** EPA will require that 20% of the VOC samples be submitted for fixed laboratory analysis. LANL has identified problems with their mobile laboratories in the past.
8. **Page 6; Response 5B:** LANL's response in the first sentence of the paragraph to be added to the workplan is confusing and does not correlate with other parts of the workplan. For each boring, LANL must sample additional vertical intervals if the 1-2 foot interval is contaminated in a boring. Analysis shall be identical to the 0-12 inch interval. In this phase, each boring shall go to at least five feet. Please note that LANL must determine the vertical extent of contamination for each boring. The horizontal language contained in the response is acceptable.
9. **Page 10; Response 12:** EPA will still require investigation of PRSs 3-043(a,f,g) and PRSs 3-036(c,d). Please revise the workplan to include the investigation requirements.
10. **Page 13; Response 16:** This unit (3-043(a)) should be investigated. Please revise the workplan to include the investigation requirements.
11. **Page 13; Response 17:** This unit (3-043(b)) should be investigated. Please revise the workplan to include the investigation requirements.
12. **Page 14; Response 18:** These units, 3-043(f) and 3-036(c), should be investigated. Please revise the workplan to include the investigation requirements.

13. **Page 14; Response 19:** These units, 3-043(g) and 3-036(d), should be investigated. Please revise the workplan to include the investigation requirements.

14. **Page 14; Response 20:** These units, 3-043(d,h) and 3-036(a), should be investigated. Please revise the workplan to include the investigation requirements.

15. **Page 16; Response 22:** This unit, 3-029, should be investigated. Please revise the workplan to include the investigation requirements.

16. **Page 17; Response 23:** EPA recommends sampling initially to determine if there is a problem and then later during D & D. Please revise the workplan to include the investigation requirements.

17. **Page 17; Response 24:** EPA recommends sampling initially to determine if there is a problem and then later during D & D. Please revise the workplan to include the investigation requirements.

18. **Page 20; Response 27:** LANL needs to submit an investigation plan for the 79 linear ft. of pipe not enclosed within secondary containment. Please revise the workplan to include the investigation requirements.

19. **Page 21; Response 29:** LANL must investigate the oil/water separator to determine whether leaks have occurred. In addition, for operating SWMUs, EPA may require periodic monitoring. Please revise the workplan to include the investigation requirements.

20. **Page 22; Response 32:** This attachment is missing most of the pages. Please provide these pages in the revised workplan.

21. **Page 23; Response 33:** EPA will require investigation of this unit, 3-041, due to past and present spills. Please revise the workplan to include the investigation requirements.

22. **Page 25; Response 36:** EPA will require additional inspections to ensure no future releases during the operational period of the unit. Please revise the workplan accordingly.

23. **Page 27; Response 39:** EPA will require that these tanks be investigated. Please revise the workplan to include the investigation requirements.

24. **Page 28; Response 41:** EPA will not agree to a no further action decision until the TSCA officials approve of those actions.

25. **Page 29; Response 43:** Is the acid line in the blueprint drawings the same as the industrial waste line? Please clarify.