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U. S. Department of Energy
 Los Alamos Area Office, MS A316
 Environmental Restoration Program
 Los Alamos, New Mexico 87544
 505-667-7203/FAX 505-665-4504

Date: November 6, 1996
 Refer to: EM/ER:96-573

Mr. Ed Kelley
 NMED-HRMB
 P.O. Box 26110
 Santa Fe, NM 87502

SUBJECT: CLARIFICATION REQUEST FOR THE EPA DISAPPROVAL LETTER FOR OU 1114 RFI WORK PLAN, ADDENDUM 1, NOD RESPONSE

Dear Mr. Kelley:

The Los Alamos National Laboratory's Environmental Restoration (ER) Project staff contacted Mr. Stuart Dinwiddie with the Laboratory's need for clarification on the Environmental Protection Agency's (EPA's) and New Mexico Environment Department's (NMED's) Disapproval Letter of the Resource Conservation and Recovery Act Facility Investigation (RFI) Work Plan for Operable Unit (OU) 1114, Addendum 1, Notice of Deficiency (NOD) Response. The Disapproval Letter is dated August 26, 1996. The Laboratory noted the need for clarification of the Disapproval Comments. This would allow us to address the regulator's concerns. Mr. Dinwiddie suggested that we provide NMED with a list of Disapproval Comments that need clarification and request an extension to respond to the Disapproval Letter. Listed below, please find those items where clarification is necessary from NMED. We would also like, at this time, to request an extension for response submittal to 15 working days after we receive clarification.

The following are the Disapproval Letter Comments which need some clarification:

DISAPPROVAL LETTER COMMENT #1

Please clarify for DISAPPROVAL LETTER COMMENT #1, what type of schedule the reviewer would like if the previous attachment was unacceptable. An excerpt from the baseline concerning the schedule for the potential release sites (PRSs) in question was submitted as Attachment 1 in the original NOD response. The exact dates for the schedule were in the GANTT chart provided.



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DISAPPROVAL LETTER COMMENT #2

Please clarify for DISAPPROVAL LETTER COMMENT #2, if the reviewer is suggesting the ER Project change the standard operating procedure (SOP) to mandate logging of PID/FID readings for all surface samples. LANL-ER-SOP 01.04, R2, SAMPLE CONTROL AND FIELD DOCUMENTATION addresses providing soil descriptions and PID/FID readings in Section 6.1.3, "Sample Collection Logs." PID/FID readings are seldom collected for surface samples unless the sampling plan specifically identified using the readings to bias a sample location. The ER Project has and continues to follow the procedure referenced above. The referenced SOP is included as Attachment A.

DISAPPROVAL LETTER COMMENTS #3, #4, #5, AND #6

Please clarify for DISAPPROVAL LETTER COMMENTS #3, #4, #5, and #6, why the response provided to Deficiencies #1, #2, #3, and #4 did not adequately address all of the reviewer's concerns. In addition, please clarify why the reviewer is prescribing arbitrary sampling depths for Deficiencies #2 and #4.

In the Laboratory response to Deficiency # 2, it states that we would collect samples in 2-ft intervals up to a 10-ft depth, which will total five samples per location; this is beyond what EPA suggested. As stated in the response to Deficiency #4, the Laboratory intends to collect a surface sample and a soil/tuff interface sample whether the soil/tuff interface occurs at 2 ft, 4 ft, 8 ft, or 20 ft. In all cases, samples will continue to be collected to depths greater than the soil/tuff interface if contamination continues to be detected.

DISAPPROVAL LETTER COMMENTS #9, #10, #11, #12, #13, #14, AND #15

Please clarify for DISAPPROVAL LETTER COMMENTS #9, #10, #11, #12, #13, #14, and #15, why the response provided to Deficiencies #12, #16, #17, #18, #19, #20, and #22 did not adequately address all of the reviewer's concerns. The Laboratory would like to continue to pursue no further action (NFA) as stated in the NOD responses listed above for the aboveground storage tanks [PRSS 3-043(a,b,d,f,g,h) and 3-036(a,c,d)], and the landfill (PRS 3-029) at the Asphalt Batch Plant. The Laboratory believes the NOD response answered EPA's concerns adequately and would like the reviewer to clarify why the Laboratory's responses were not sufficient.

Furthermore, the Laboratory would like to invite the reviewer to tour the Asphalt Batch Plant to observe the day-to-day operations and general plant upkeep. In addition, an ER representative will be available to point out all of the current and previous PRS locations addressed in the NOD Response.

DISAPPROVAL LETTER COMMENTS #15, #16, AND #17

Please clarify for DISAPPROVAL LETTER COMMENTS #15, #16, and #17, why the response provided to Deficiencies #22, #23, and #24, did not adequately address all of the reviewer's concerns. Is the reviewer

concerned that potential contaminants may be leaving the site via storm water runoff from the entire Asphalt Batch Plant, or perhaps specifically from PRSs 3-029, 3-045(g), and C-3-016 at the Asphalt Batch Plant?

DISAPPROVAL LETTER COMMENT #18

Please clarify for DISAPPROVAL LETTER COMMENT #18, whether the reviewer is asking the Laboratory to create a new solid waste management unit (SWMU). The SWMU response to Deficiency #27 came from 3-025(a), an active sump in the basement of SM-102. The active waste lines going to, or leading from, this sump called out in the Disapproval Letter is not part of the SWMU, and is dealt with by the Radioactive Liquid Waste Treatment Facility group (CST-13) since it is an active waste line.

DISAPPROVAL LETTER COMMENT #19

Please clarify for DISAPPROVAL LETTER COMMENT #19, why the Laboratory proposal for sampling after Decontamination and Decommissioning at this active oil/water separator does not adequately address the reviewer's requirement for investigation.

DISAPPROVAL LETTER COMMENT #21

Please clarify for DISAPPROVAL LETTER COMMENT #21, what past and present spills the reviewer is referring to. Please clarify why the Laboratory is being asked to sample a PRS that has never been used. It clearly states in both the RFI Work Plan for OU 1114, Addendum 1 (LANL 1995, 17-1275), and in the response to Deficiency #33 that this double encased vault associated with the Radioactive Liquid Waste Line has never been used.

DISAPPROVAL LETTER COMMENT #22

Please clarify for DISAPPROVAL LETTER COMMENT #22, why the NOD response did not adequately answer the reviewer's concerns. As the response to NOD Deficiency #36 states, the sumps look intrinsically sound. Since there are no drains from these sumps (as stated in the OU 1114 RFI Work Plan, Addendum 1), as oil/water/grease accumulates in the sumps it is pumped out and appropriately disposed of through an oil/water separator at the main motorpool. Also, please clarify why inspections are being required at this PRS, what kind of inspections EPA will require, at what frequency, and in what manner the inspections should be reported.

DISAPPROVAL LETTER COMMENT #23

Please clarify for DISAPPROVAL LETTER COMMENT #23, why the reviewer requires a sampling plan for the abandoned underground storage tanks (USTs). These tanks contained dielectric oil for experiments, the oil was removed when the tanks were filled with sand and abandoned; therefore, there is no longer a potential source of contamination. In addition, a building wing has been erected over the UST location.

Your indulgence in clarifying some of the Disapproval Letter comments is appreciated. We would like to ensure that we address the intent of the reviewers comments. For reviewing ease, we have included a copy of the original EPA NOD containing the Laboratory's responses coupled with the Disapproval Letter as Attachment B, and a copy of Chapter 6 from the OU 1114 RFI Work Plan, Addendum 1, as Attachment C.

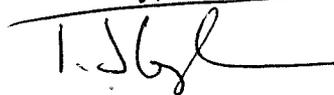
If you have questions regarding this request, or would like to set up site visits to any of the PRSs addressed in the Disapproval Letter or associated NOD response, please contact Garry Allen at (505) 667-3394 or Bonnie Koch at (505) 665-7202.

Sincerely,



Jörg Jansen, Program Manager
LANL/ER Project

Sincerely,



Theodore J. Taylor, Program Manager
DOE/LAO

JJ/TT/bp

- Enclosures: (1) Attachment A
(2) Attachment B – including Attachments 1-11, NOD Response for OU 1114, Addendum 1
(3) Attachment C

Cy (w/ encs.):

- G. Allen, CST-18, MS E525 (Attachment B only)
- T. Baca, EM, MS J591 (Attachment B only)
- S. Dinwiddie, NMED-HRMB (All Attachments)
- T. Glatzmaier, DDEES/ER, MS M992 (Attachment B only)
- B. Koch, LAAO, MS A316 (Attachment B only)
- D. McInroy, EM/ER, MS M992 (Attachment B only)

Cy (w/o encs.):

- D. Griswold, AL-ERD, MS A906
- J. Harry, EES-5, MS M992
- M. Leavitt, NMED-GWQB
- N. Naraine, DOE-HQ, EM-453
- D. Neleigh, EPA, R.6, 6PD-N (2 copies)
- C. Rodriguez, CIO, MS M707
- T. Taylor, LAAO, MS A316
- N. Weber, NMED-AIP, MS J993
- J. White, ESH-19, MS K498
- S. Yanicak, NMED-AIP, MS J993
- J. Levings, AL-ERD, MS A906
- W. Spurgeon, DOE-HQ, EM-453
- J. Vozella, LAAO, MS A316
- K. Zamora, LAAO, MS A316
- EM/ER File, MS M992
- RPF, MS M707