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M E M O R A N D U M

To: Steve Alexander, Manager
RCRA Technical Section

Through: Bruce Swanton, AIP POC/LANL

From: Danny Katzman, AIP/LANL

Date: June 6, 1993

Re: Review of LANL's Operable Unit 1129 RFI Work Plan

LANL 6211 00/33/747

The Hazardous and Radioactive Materials Bureau's (HRMB's) Agreement in Principle (AIP) personnel have completed their review of the Operable Unit (OU) 1129 RCRA Facility Investigation (RFI) Work Plan. This memo contains AIP questions and comments on the Work Plan. The AIP is submitting the enclosed HSWA-related comments to the HRMB's RCRA Permits and Enforcement/Technical Programs because of eventual New Mexico HSWA authorization.

General Comments

- covered in General Comment No. 2*
- 1). In general, soil and sediment sampling locations should be evenly-spaced and based on known or potential pathways, defined drainages, fall lines, and expert judgement.

Specific Comments

- covered in Comment No. 5*
- 2). Section 5.2.7, Decision Point 4, Bullet 1
"... the mean sample concentration for any listed COC does not exceed the risk-based action levels for that COC,".
SALs should be compared to discreet sample concentrations and not mean sample concentrations.
- covered in Comment No. 2*
- 3). Section 7.3.1
Regarding randomly-generated sample locations, See General comment #1.

SWMU Aggregate A

- covered in Comment No. 7*
- 4). Section 7.5.2, Phase I Field Activities Investigation
Surface radiological surveys may not be adequate for characterizing the



- ✓ potential for COCs in the canyonside disposal area. Subsurface samples should be collected in SWMU 4-002 (Canyonside Debris Pile) regardless of field screening indications in order to confirm the presence or absence of COCs. Samples should also be collected from sediment catchment areas on the canyon side beneath the debris pile.

SWMU Aggregate B

- ✓ 5). Section 7.6.2, Phase I Field Activities Investigation *Covered in Comment No. 7*
Surface radiological surveys may not be adequate for characterizing the potential for COCs in the canyonside disposal area. Subsurface samples should be collected in SWMU 5-002 regardless of field-screening indications in order to confirm the presence or absence of COCs. Samples should also be collected from sediment catchment areas on the canyon side beneath the debris pile.

✓ **SWMU Aggregate C**

- 6). Section 7.7.3, Sample Screening and Analysis *Covered in Comment No. 9*
Field screening for VOCs should be included in subsurface investigations at SWMUs 5-004 and 5-005(a). If elevated levels are detected using screening instrumentation, samples should be collected and analyzed for VOCs.

SWMU Aggregate E

- 7). Section 7.9.2, Phase I Field Investigation Activities *Covered in Comment No. 11 (para 7-46)*
If field screening or analytical results show contamination at the bottom of the 2-foot auger holes, augering should continue in order to detect the extent of contamination prior to the implementation of a VCA.

SWMU Aggregate F

- 8). Section 7.10.1, Sampling Plan Rationale and Objectives *Covered in Comment No. 12*
Because of the limited knowledge as to the range of possible COCs associated with the septic systems, field screening should be conducted for VOCs, and all samples where field screening indicates the presence of VOCs should be sent for lab analysis.

SWMU Aggregate G

- 9). Section 7.11.2, Subsurface Investigation *Covered in Comment No. 13*
Additional boreholes are necessary to assess the potential for contaminant

migration beneath the lagoons.

SWMU Aggregate I

- Covered in Comment No. 14*
10). Section 7.13.3, Sample Screening and Analysis
Metals should be included in the list of contaminants to be analyzed for.

SWMU Aggregate J

- Covered in Comment No. 15*
11). Section 7.14.2, Phase I Field Investigations Activities
Additional information from the previous D & D operations at SWMU Aggregate J should be provided in order to verify past clean-up activities.
- Covered in Comment No. 15*
12). Section 7.14.3, Sample Screening and Analysis
Since the full range of potential COCs associated with "sanitary and industrial wastes from incineration and decontamination activities" is unknown, some percentage of the samples collected should be analyzed for PCBs in Phase I.

SWMU Aggregate N

- 13). Section 7.18.2, Waste Lines Subsurface Investigation
This sampling plans states that "One soil sample will be collected from each test pit at anomalous areas identified during the radiation and surveys. If no anomalies are identified during the field surveys, samples will be collected from the approximate depth of the former waste line (i.e. the fill/natural soil contact)." It is recommended that additional samples be collected from the test pits in order to assess the possible presence of residual contamination.
These are inside the test pits. There is no need to collect additional samples

SWMUs Recommended for No Further Action

- Covered in Comment Nos 1*
14). The AIP will be assessing archival information and conducting site visits in order to evaluate the suitability of each NFA nomination. Upon completion of the NFA review process, a separate memo will be delivered by the AIP to the NMED RCRA Technical Compliance Program and RCRA Permits Program

If you have any questions, please contact Bruce Swanton at 672-0447.