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M E M O R A N D U M

TO: STEVE ALEXANDER, RCRA TECHNICAL COMPLIANCE PROGRAM  
MANAGER

THROUGH: BRUCE SWANTON, POC  
AIP DOE/LANL

FROM: TIM MICHAEL, AIP

DATE: OCTOBER 25, 1993

RE: REVIEW OF THE LOS ALAMOS NATIONAL LABORATORY RCRA  
FACILITY INVESTIGATION WORK PLAN FOR OPERABLE UNIT 1129

~260+ Summary

The Hazardous and Radioactive Materials Bureau (HRMB), under the Agreement in Principle (AIP) program, has reviewed the subject Work Plan. This memo documents the comments and concerns of the AIP.

The RFI Work Plan for this Operable Unit (OU) was completed in May 1992. Subsequently, the EPA issued a Notice of Deficiency (NOD). Final response to the NOD was submitted by Los Alamos National Laboratory (LANL) on September 30, 1993. Many of the concerns of the AIP were addressed in the NOD response. However, in order to maintain a complete record, all of the AIP comments are listed in this document.

The following comments are related to HSWA issues, and are being submitted in anticipation of eventual New Mexico HSWA authorization. Specific comments are keyed to the section and page number of the Work Plan, and to the page number of the NOD response, if applicable.

General Comments

1. A tour of No Further Action <sup>(NFA)</sup> units by NMED/AIP, possibly supplemented by an NMED/AIP review of archival data, will be necessary before NMED/AIP can comment on the adequacy of NFA recommendations. Observations made at NFA units by AIP staff will be reported as an addendum to this review.  
/RFI/GEN/HS/N/
2. Random sampling may not be the best way to locate contaminants in soil and sediments. Soil and sediment sampling locations should be based on known or potential pathways, defined drainages, fall lines, and field observations.  
/RFI/GEN/HS/N/

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Specific Comments

3. According to the LANL response to NOD Comment No.2, an addendum to the original RFI Work Plan for OU 1129 was sent to DOE/LAAO on or about March 24, 1993. A copy of this addendum should be provided to the Hazardous and Radioactive Materials Bureau.  
/NOD/SPE/HS/Y/

*Specific to Hazard Comment 2*

4. According to the LANL response to NOD Comment No. 3.d., SWMUs 48-004 (a through c) are considered to be under operational control. Perhaps these sumps and tanks should not be listed as SWMUs. Also, it is our understanding that a site can only be approved for No Further Action if 1) the site is not a Solid Waste Management Unit, 2) there is no potential for release of hazardous substances, or 3) a documented and acceptable remedial action has been completed. Institutional control, and decontamination, and decommissioning activities are not acceptable reasons for NFA approval. See also comment No. 1.  
/NOD/SPE/HS/Y/

*Do not list sumps and tanks as SWMUs*

*Are these FCLAs?*

5. [5.1, page 5-2 and 5.2.7 page 5-9] OU 1129 Technical Approach  
These sections state that analytical sample means are compared to action levels. According to Proposed Subpart S, sample concentrations, not mean sample concentrations, should be compared to action levels. Also, EPA risk assessment guidance calls for calculating the 95 percent upper confidence limit (UCL) on the arithmetic mean of site contamination rather than the 90 percent confidence interval.  
/RFI/SPE/HS/N/

*Mean? Separate Comment SA*

*be a little more specific*

6. [7.3.2, page 7-10 and 11]  
Random samples should be augmented by samples based on historical information, known or potential migration pathways, and field observations.  
/RFI/SPE/HS/Y/

*[Handwritten mark]*

7. [7.5.2, page 7-17 (7-18)] Phase I Field Activities

SWMU 4-002 Canyonside Disposal Area

Because surface <sup>samples</sup> surveys may not be adequate for locating COCs in the canyonside disposal area, subsurface samples should be collected regardless of field screening investigations.

← Samples should also be collected from sediment catchment areas on the canyonside beneath the debris pile.

/RFI/SPE/HS/Y/

8. [7.6.2, page 7-22] Phase I Field Activities

SWMU 5-002 Canyonside Disposal Area

See Comment No. ~~8~~ 7.  
/RFI/SPE/HS/Y/

9. [7.7.3, page 7-31] Sample Screening and Analysis

SWMU 5-005 French Drain

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.

/RFI/SPE/HS/Y/

10. [7.8.2, page 7-35] Phase I Field Activities

SWMUs 35-003 (a,b,c and n)

Response to NOD Comment No. 9.a. states that LANL will notify the EPA as soon as a SAP is complete for these SWMUs as an addendum to the RFI Work Plan for OU 1129. A copy of this addendum should be provided to the Hazardous and Radioactive Materials Bureau.

/NOD/SPE/HS/Y/

11. [7.9.2, page 7-48 (7-50)] Phase I Field Activities

SWMU 35-008 Canyonside Disposal Area

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.

/RFI/SPE/HS/Y/

← ?  
Voluntary Corrective Action

← Comment No. 9

← see side note

← see page 22

12. [7.10.1, page 7-52 (7-54)] Sampling Plan Rationale and Objectives

SWMUs 35-009(a-d) Septic Systems

Because of the limited knowledge on the range of possible COCs associated with the septic systems, field screening should be conducted for VOCs, and sampled where field screening indicates VOCs should be analyzed.  
 /RFI/SPE/HS/Y/

*2 samples should be collected  
 from elevated levels*

13. [7.11.2, page 7-69 (7-70)] Subsurface Investigation

SWMU 35-010 Sanitary Lagoons and Sand Filters

One borehole may not be sufficient to assess the potential for contaminant migration beneath the lagoons.  
 /RFI/SPE/HS/Y/

*?? -> optimal??*

14. [7.13.3, page 7-79] Sample Screening and Analysis

SWMU Aggregate I

Samples should also be analyzed for metals.  
 /RFI/SPE/HS/Y/

*collected type - total dissolved  
 metals*

*OK* 15. [7.14, page 7-82] SWMU Aggregate J, Phase I

SWMUs 42-001, 2 and 3

Refer to response to NOD Comment No. 17. Please provide a copy of the revised RFI Work Plan for OU 1129 or the interim investigation when it becomes available.  
 /NOD/SPE/HS/Y/

If you have any questions regarding this review, please contact Tim Michael with the Agreement in Principle program at the Hazardous and Radioactive Materials Bureau of the New Mexico Environment Department at (505) 827-4308.

*EX/Investigation*

SOURCE	TYPE 1			TYPE 2			RESPONSE	
/RFI WKPLN	NOD/GENERAL	SPECIFIC	NFA/HSWA	NON-HSWA	RESPONSE REQD/			
RFI	NOD	GEN	SPE	NFA HS	NHS	Y	N	