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November 10, 1993

Ms. Diana Webb, LANL/AIP/POC  
 LAAO, 528 35th Street  
 Los Alamos, NM 87544

RE: Review of LANL's RCRA Facility Investigation (RFI) Work Plan  
 for Operable Unit (OU) 1129

Dear Ms. Webb:

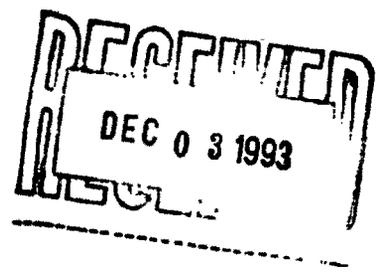
The enclosed attachment provides to the Department of Energy the Agreement-in-Principle's technical comments for the above referenced RFI Work Plan as received by the Hazardous and Radioactive Materials Bureau's Technical Compliance Program.

Sincerely,

*Tim Thibodeau* FOR BRUCE SWANTON  
 Bruce Swanton, LANL/AIP/POC, Program Manager  
 Hazardous and Radioactive Materials Bureau

BS/tm  
 Attachment

- cc: Benito Garcia, HRMB Bureau Chief
- Steve Alexander, Technical Compliance Program Manager
- Barbara Hoditscheck, RCRA Program Manager
- Neil Weber, DOE Oversight Bureau Chief
- Tim Michael, DOE Oversight AIP Technical Staff
- Glen Saums, SWQB Program Manager
- Dennis McQuillan, GWPRB Program Manager
- Barbara Driscoll, EPA Region 6
- Allyn Pratt, LANL OUPL
- File LANL/RED/93



LANL/OU1129/COVER LETTER



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MEMORANDUM

TO: STEVE ALEXANDER, RCRA TECHNICAL COMPLIANCE PROGRAM  
MANAGER

THROUGH: BRUCE SWANTON, POC  
AIP DOE/LANL

FROM: TIM MICHAEL, AIP

DATE: NOVEMBER 10, 1993

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

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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 (NFA) 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.
2. Although random sampling may be an un-biased method of characterizing contaminants in soil and sediments, additional samples based on known or potential pathways, defined drainages, fall lines, or other field observations may be necessary to complete a Phase I investigation.

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.

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. Should these units be covered under the RCRA operating permit, and therefore not be SWMUs at all?

The response goes on to say "The tanks and sumps of SWMU Nos. 48-004(a through c) have been inspected, and there is no physical evidence of releases or external contamination. A SWMU can be considered for NFA if site design, conditions, or operational controls preclude any release from the SWMU that would pose a threat to human health or the environment. SWMU Nos. 48-004(a through c) are recommended for NFA." According to a LANL memorandum dated September 2, 1993, Results of Lessons Learned Meeting, acceptable criteria for an NFA decision include 1) evidence that a potential release site is not a solid waste management unit, 2) information that there is no potential for release of hazardous substances, or 3) documentation that a remedial action already has occurred. The memo goes on to say that institutional control and decontamination and decommissioning activities are not acceptable reasons.

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.

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.

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

SWMU 4-002 Canyonside Disposal Area

Because surface surveys may not be adequate for locating contaminants of concern in the canyonside disposal area, subsurface samples should be collected regardless of field screening investigations. Soil samples should also be collected from sediment catchment areas on the canyonside beneath the debris pile.

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

SWMU 5-002 Canyonside Disposal Area

See Comment No. 7.

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

SWMU 5-005 French Drain

Field screening for volatile organic compounds should be included in subsurface investigations at SWMUs 5-004 and 5-005(a). If elevated levels are detected using screening instrumentation, soil samples should be collected and analyzed for volatile organic compounds.

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.

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 until the concentration of contaminants does not exceed detection limits or natural background levels.

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 volatile organic compounds, and samples should be collected and analyzed where indicated by screening.

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.

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

SWMU Aggregate I

Samples should also be analyzed for metals.

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.