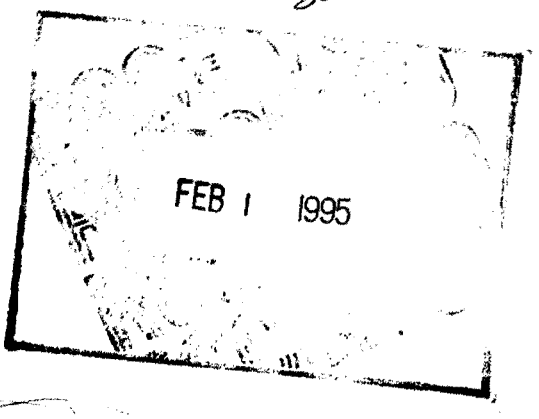
Ron K
Barbara —
Teri —
Susan ✓

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JAN 23 1995




Mr. Joseph C. Vozella
Assistant Area Manager
Environment, Safety and Health Branch
Department of Energy
Los Alamos Field Office
Los Alamos, NM 87544

c/NC

Re: RFI Work Plan Addendum for Operable Unit 1129
Los Alamos National Laboratory (NM0890010515)

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has reviewed the final addendum for RCRA Facility Investigation Work Plan for Operable Unit 1129, and found it to be deficient. Enclosed is a list of deficiencies which should be responded to within forty-five days of receipt of this letter.

Should you have any questions, please feel free to contact Ms. Barbara Driscoll at (214) 665-7441.

Sincerely,

WK Honker

William K. Honker, P.E., Chief
RCRA Permits Branch

Enclosure

cc: Mr. Benito Garcia
New Mexico Environment Department
Mr. Jorg Jansen
Los Alamos National Laboratory

2725

**List of Deficiencies**
**Operable Unit 1129**
**Workplan Addendum dated June 29, 1994**

**General Comments:**

1. LANL shall provide a schedule for fieldwork start, fieldwork completion and RFI report dates for each SWMU.

2. In the Sampling and Analysis Tables for metals, LANL indicates analysis will be conducted by XRF or ICPES. LANL needs to demonstrate the equivalency of an XRF with SW 846 method 6010 prior to substituting XRF use for laboratory analysis.

3. In several instances LANL has subdivided SWMUs by using subscripts such as SWMU 35-014($g_1$, $g_2$ and $g_3$) while the SWMU listed in the HSWA portion of the permit is not subdivided (35-014(g)). LANL needs to apply for a Class 1 modification to the permit for any of these units which are subdivided.

4. The following units do not need to be added to the HSWA portion of the RCRA permit:

| | | | | | |
|---|---|---|---|---|---|
| C-4-001 | 5-006(f) | C-35-003 | 35-004(o) | 48-007(e) | 55-002(c) |
| C-5-001 | 5-006(g) | C-35-004 | 35-014(c) | 48-009 | 55-010 |
| 5-006(a) | C-35-001 | 35-004(i) | 35-018(b) | C-52-001 | 55-012 |
| 5-006(d) | C-35-002 | 35-004(j) | 48-002(c) | C-52-002 | 63-002 |

**Specific Comments:**

1. **7.21 SWMU Aggregate Q, Phase I, p. 7-129** - LANL needs to provide additional information concerning what type of work occurred in laboratory control building TA-4-3 in order for EPA to make a determination concerning which hazardous constituents may have been present.

2. **7.21.2 Phase I Field Investigation Activities, p. 7-130 -**

a. LANL needs to elaborate on actual sampling being conducted at SWMU 4-004. How are samples being composited? EPA would prefer discrete sampling.

b. Sample analysis for the photographic outfall, SWMU 4-003(a) should also include SVOCs and VOCs (at sampling intervals deeper than 6 inches).

3. **7.22 SWMU Aggregate R, Phase I, p. 7-137** - SWMU 5-006(h) - What is the function of an x-unit chamber?

4. **7.22.2 Phase I Field Investigation Activities, p. 7-138 -**

a. SWMU 5-006(c) and 5-005(b)- LANL needs to explain what interval is being composited, and if more than one sample is being combined for the composite sample.

b. If high explosives (HE) are a potential contaminant at these sites, would the HE spot test kit be useful for Composition "B", primacord detonators and Baratol? If useful then LANL should consider using the test kit during the radiological survey.

5. **7.24 SWMU Aggregate T, Phase I, p. 7-150 -** LANL needs to provide additional information concerning SWMU 35-009(e). What activities occur in building TA-35-25, and what does the drain line connect to inside the building?

6. **7.24.2 Phase I Field Investigation Activities, p. 7-152 -** SWMU 35-004(h) - Is LANL addressing the concrete catch basin for this SWMU? Have the basins been inspected for leakage? Is the drainage area for this SWMU covered with asphalt until SWMU 35-003(r) is reached? Will sampling be conducted at the point where SWMU 35-004(h) intersects with SWMU 35-003(r)?

7. **7.25.2 Phase I Field Investigation Activities, p. 7-158 -**

**a.** SWMU 35-004(b) - Sampling locations should be located where it appears material may have drained from the storage area if possible.

**b.** SWMU 35-014(e) - What systematic method will be used to determine which samples are to be analyzed for VOCs and SVOCs. In addition, no grid points appear to intersect the projected location of 35-014($e_2$) in Figure 7-56. LANL should ensure that the area of the SWMU is sampled.

8. **7.26.2 SWMU Aggregate V, Phase I, p. 7-168 -**

a. **SWMU 35-015(a)** - LANL should identify stained areas for preferential sampling at SWMU 35-015(a) rather than using a grid system. If no staining is observed then defer back to the grid system. Information in text is conflicting the first paragraph indicates a 30-foot grid will be used and the next discussion of this SWMU indicates that a 20-foot grid will be used.

The grid should be indicated on Figure 7-59, and it would be better to show a more detailed figure of this SWMU. The drainage paths which are being sampled are not indicated on the figure.

b. **SWMU 35-014($g_3$)** - This was the site of a major spill, and LANL should collect some samples at depth in addition to the surface sampling. LANL should collect at least four additional samples at the 3 foot depth, and analysis should be the same as the surface samples.

How far into Ten Site Canyon does the zone of staining continue? The area of staining should be indicated on a figure with the drainage into Ten Site Canyon also indicated.

9. **7.27 SWMU Aggregate W, Phase I Field Investigation Activities, p. 7-175** -

a. Are the two auger holes that are being drilled at SWMU 35-010(d) downgradient or upgradient from the sand filters? Have there been any overflows from the filters?

Figure 7-62 should indicate the location of the NPDES outfall and drainage.

b. Has LANL examined aerial photographs to help determine the location of AOC C-35-007?

10. **7.28 SWMU Aggregate X, Phase I, p. 7-180** - SWMU 48-002(e) - What is the period of time for use of this container storage area? If the period of use for this area is recent then sampling may not be required unless stains related to spills are apparent.

11. **7.28.2 Phase I Field Investigation Activities, p. 7-181** - SWMU 48-010 - LANL should collect a sample from the material in the bottom of the pond and conduct analysis for metals. This sample might take the place of the proposed surface sample.

12. **7.29 SWMU Aggregate Y, Phase I, p. 7-185** - What are the hazardous constituents, if any, in the non-contact cooling water? Were either of the outfalls 48-007(c) or (f) used prior to inclusion in the NPDES permit, and if these are newer outfalls is there documentation of what is in the cooling water?

13. **7.30 SWMU Aggregate Z, Phase I, p. 7-190** - These outfalls appear to be storm drains, and as such probably should not be sampled under this program. Sampling may be required for a storm water discharge permit.