

TA08

Los Alamos

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

DATE September 20, 1994
IN REPLY REFER TO ER:94-J380
MAIL STOP M992
TELEPHONE 667-0808

Mr. Ted Taylor
Program Manager
Department of Energy
Los Alamos Area Office
MS, A316
Los Alamos, NM 87544

Dear Ted:

SUBJECT: RESPONSE TO THE ENVIRONMENTAL PROTECTION AGENCY'S (EPA) DRAFT LIST OF MODIFICATIONS ON THE NOTICE OF DEFICIENCY (NOD) RESPONSE FOR OPERABLE UNIT (OU) 1157

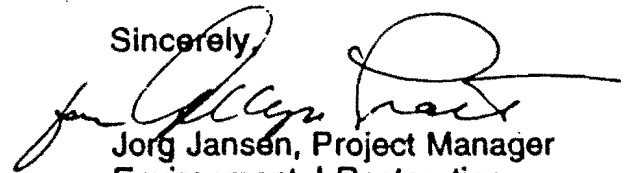
Enclosed are four copies of the response to the EPA's comments to our response to the original NOD on the Resource Conservation and Recovery Act Facility Investigation Work Plan for OU 1157. The response repeats each EPA comment, so I have not enclosed a copy of the original List of Modifications. The revised text changes to the work plan, based on the response to the original NOD and the List of Modifications, will follow at the end of this week.

A draft letter for your use in submitting two copies of the response to the EPA is attached. The third copy is for your files, and the fourth is for the New Mexico Environment Department.

EPA requested a signed certification statement for this response, which is also enclosed.

If you have comments or questions, please call Tracy Glatzmaier at 5-2613.

Sincerely,


Jorg Jansen, Project Manager
Environmental Restoration

TG/plp



Ted Taylor
September 20, 1994
ER:94-J380
Page 2

Enclosures: Response to EPA's List of Modifications on the NOD for OU 1157
(4 copies)
Draft Letter to the EPA
Signed Certification Statement

Cy:
T. Glatzmaier, ER, MS M992
RPF, MS M707 (w/ enclosures)

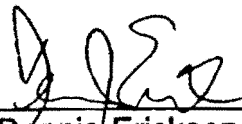
CERTIFICATION

I certify under penalty of law that these documents and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violation.

Document Title:

Response to the Environmental Protection Agency's (EPA) Draft List of Modifications on the Notice of Deficiency (NOD) Response for Operable Unit (OU) 1157

Name:



Dennis Erickson
Division Director
Los Alamos National Laboratory

Date:

9/23/94

Name:

Joseph Vozella, Chief
Environment, Safety, and Health Branch
DOE-Los Alamos Area Office

Date:

**List of Modifications
Operable Unit 1157**

1. *General comment #4 states EPA's position on any RFI investigation. LANL shall note that if contamination is found above background, then LANL must find the full extent of contamination and must demonstrate that there is a "clean zone" beneath the contamination. LANL shall revise their overall strategy accordingly. This comment also applies to LANL's response to Specific Comments 1(b), 5(a), 5(g), 6(e), 12(b), 13(e), 15, 15(b), 17(c), 18(d), 20(b), 21, 23(b), 24(b), 25(c), 27(c), and 28(c)*

Response:

LANL and DOE personnel have discussed this subject with EPA several times, most recently in a meeting on August 18, 1994. The consensus on this subject was that LANL would compare data analysis results against background. If contaminant levels statistically exceed background, the full nature and extent of the contamination must be defined. EPA will look at data results and LANL's proposed decisions based on those results on a case-by-case basis. This approach will be applied to investigations at Operable Unit 1157, as well as all other investigations conducted at LANL.

2. *When is the revised work plan being submitted?*

Response:

The text changes implementing the agreements made by LANL in this response, as well as the response to the Notice of Deficiency issued by EPA and responded to by LANL on May 23, 1994 will be provided no later than September 23, 1994. The text changes will indicate deletions, additions and any changes necessary. A whole new "revised work plan" will not be provided, based on previous conversations with EPA which indicated there is not a need to provide a new work plan.

3. *LANL has still not provided the information requested in these comment 5(e) and 6(a). LANL shall provide the list of all hazardous constituents that make up or are included in photoprocessing wastes.*

Response:

The original NOD comment 5(e) referenced PRS 8-009(d), and 6(a) referenced PRS 8-009(e), both process waste water outfalls that served photoprocessing laboratories. All of the known constituents that could have been a part of the discharge to the outfalls are listed below.

Chromium
Mercury
Selenium
Silver
Cyanide
4-Methyl-2-pentanone

The following constituents may have been part of the discharge, although complete records do not exist for all of the chemicals used in the photoprocessing laboratories:

Acetone	o-Cresol	Dimethylphthalate	p-Nitrophenol
2-Hexanone	m-Cresol	4,6-Dinitro-o-cresol	Pentachlorophenol
Methyl ethyl ketone	p-Cresol	2,4-Dinitrophenol	Phenol
Acetophenone	2,4-Dichlorophenol	Diphenylamine	p-Phenylenediamine
Aniline	2,6-Dichlorophenol	1-Naphthylamine	2,4,5-Trichlorophenol
p-Chloro-m-cresol	Diethylphthalate	2-Naphthylamine	2,4,6-Trichlorophenol
2-Chlorophenol	2,4-Dimethylphenol	o-Nitrophenol	

4. *No responses have been received for deficiency #7. LANL shall provide a response.*

Response:

We apologize for the oversight. We evidently skipped from specific comment 6(e) to specific comment 7(e) and therefore placed our response to 7(e) under the 6(e) response. Listed below are the deficiency comments and LANL's responses for specific comments 6(e) and 7(a-d). The response for specific comment 7(e) was in the original NOD response.

6. *PRS 8-009(e)--Process Waste Water Outfall*

(e) Page 6-18; 3rd paragraph: Please justify why the piping that goes from the building to the discharge point is not being investigated for a possible release.

Response:

Our approach to the RFI is phased. In Phase I we are determining the presence of COCs and not the nature and extent of the contamination. The nature and extent would be investigated in Phase II if needed. In the case of the pipeline sampling questioned, we are sampling under Phase I at the outfalls which would be the most likely area of contamination. If COCs are found, the pipeline sampling suggested in the comment would be performed under Phase II, or the pipeline would be removed under a VCA.

7. *PRS 8-009(f)--Process Waste Water Outfall*

(a) Page 6-20: Please justify why the piping that goes from the building to the discharge point is not being investigated for a possible release.

Response:

Our approach to the RFI is phased. In Phase I we are determining the presence of COCs and not the nature and extent of the contamination. The nature and extent would be investigated in Phase II if needed. In the case of the pipeline sampling questioned, we are sampling under Phase I at the outfalls which would be the most likely area of contamination. If COCs are found, the pipeline sampling suggested in the comment would be performed under Phase II, or the pipeline would be removed under a VCA.

(b) Page 6-19: Analysis of Results: If the bottommost sample still contains contaminants above background levels, then LANL must take deeper samples, regardless of the screening action levels.

Response:

Please see the response to Comment 1 above.

(c) Page 6-19: Sample and Analysis plan: Please include in the revised workplan all hazardous constituents in the fluorescent penetration waste stream.

Response:

The following constituents may have been part of the discharge, although complete records do not exist for all of the chemicals used in the fluorescent penetrant laboratory:

Acetone
Acetophenone
Aniline
Barium
Beryllium
p-Chloro-m-cresol
2-Chlorophenol
Chromium
Cyanide
o-Cresol
m-Cresol
p-Cresol
2,4-Dichlorophenol
2,6-Dichlorophenol
Diethylphthalate
2,4-Dimethylphenol
Dimethylphthalate
4,6-Dinitro-o-cresol
2,4-Dinitrophenol
Diphenylamine
Epichlorohydrin
Fluoranthene
2-Hexanone
Lead

Mercury
Methyl ethyl ketone
4-Methyl-2-pentanone
2-Methyl-1-propanol
Naphthalene
1-Naphthylamine
2-Naphthylamine
o-Nitrophenol
p-Nitrophenol
Pentachlorophenol
Phenol
p-Phenylenediamine
Selenium
Silver
Sulfites
Thallium
Toluene
2,4,5-Trichlorophenol
2,4,6-Trichlorophenol

(d) Page 6-20; Sampling Activity: If visual or olfactory contamination is evident in a specific section of the 6 inch sample then that zone should be sampled and not homogenized with the other soil. Also, LANL should take samples at deeper intervals (4-5 feet), to verify that vertical contamination has been delineated, and that sediments from the past have not been buried by younger deposited sediments.

Response:

If visual or olfactory contamination is evident then that zone would be sampled and not homogenized. Because water could have been a driving force at this site, we propose to sample at 1 foot intervals until the tuff surface is encountered.