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FILE LANL HSWA 2/1080/12, 14, 67



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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

August 16, 1996

Mr. G. Thomas Todd
DOE/LAAO
538 35th Street
Los Alamos, New Mexico 87544

Dear Mr. Todd:

**RE: Notice of Deficiency
RCRA Facility Investigation Report
Technical Areas 12, 14, and 67
Los Alamos National Laboratory (NM0890010515)**

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has received the United States Environmental Protection Agency's (EPA) review of the Department of Energy/Los Alamos National Laboratory's (DOE/LANL) RFI Report for Technical Areas 12, 14, and 67 and NMED agrees that it is deficient. DOE/LANL is requested to respond within sixty (60) days to the specific comments in Attachment A.

Should you or your staff have any questions concerning this Notice of Deficiency, please contact myself or Robert S. (Stu) Dinwiddie of my staff at the above address or by telephone at 505/827-1561.

Sincerely,

Barbara Hoditschek, Manager
RCRA Permits Management Program

attachment

- cc: J. Vozella, DOE LAAO
- T. Taylor, DOE LAAO
- J. Jansen, LANL
- D. Neleigh, EPA
- B. Garcia, NMED HRMB
- R. Dinwiddie, NMED HRMB
- Davis, NMED HRMB**
- N. Weber, NMED DOE OB
- LANL 96 File



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ATTACHMENT A
Notice of Deficiency
RFI Report for Technical Areas 12, 14 and 67
Los Alamos National Laboratory

Sites Where No Further Action (NFA) Appears Appropriate (5)

Based upon the information provided, EPA tentatively agrees with the NFA proposals for the following sites:

PRS 14-002(f), PRS 14-007, PRS 14-002(c), PRS 14-002(d), PRS 14-002(e)

Sites Where it is Appropriate Not To Add To LANL RCRA/HSWA Permit (14)

Based upon the information provided, EPA tentatively agrees the following sites are not potential SWMUs and do not need to be added to LANL RCRA/HSWA Permit:

AOC C-12-001, AOC C-12-002, AOC C-12-003, AOC C-12-005, AOC C-14-001, AOC C-14-002, AOC C-14-008, AOC C-14-004, AOC C-14-005, AOC C-14-006, AOC C-14-007, AOC C-14-009, PRS 14-004(c), Central Area Drainage

Sites Where NFA Does Not Appear Appropriate (5)

Because these proposed sites are still active, NFA does not appear to be appropriate:

PRS 14-001(a), PRS 14-001(b), PRS 14-001(c), PRS 14-001(d), PRS 14-001(e)

Sites Where Additional Information is Needed (7)

Additional information or further investigation is required for the following sites:

PRS 12-004(a), PRS 12-004(b), PRS 14-002(b), PRS 14-006, AOC C-12-004, AOC C-14-003, Firing Pad Drainage

Sites Where VCA is Proposed or Being Undertaking (7)

Further information will need to be provided on these sites prior to a decision being finalized:

PRS 12-001(a), PRS 12-001(b), PRS 14-001(f), PRS 14-002(a), PRS 14-009, PRS 14-010, PRS 14-003

Sites Where Deferred Action is Proposed (4)

Deferred action is proposed as these sites are still active:

PRS 14-001(g), PRS 14-005, PRS 14-004(a), PRS 14-004(b)

GENERAL COMMENTS

1. RFI Reports should present all the analytical data (these which are above LANL UTL which is used as the basis for decision making. **(Best Professional Judgement or BPJ)**)

2. Sites which are listed on the HSWA permit, and for which LANL is proposing a VCA should still have all the analytical results submitted. The VCA report may function as the equivalent of the RFI Report, provided all the sampling and analytical data is provided in the VCA. Otherwise, LANL needs to provide the RFI data in the RFI Report. (BPJ)

SITE-SPECIFIC COMMENTS

AOC C-12-004

1. Section 5.6.5 (Background Comparisons), Page 5-13: The Report states that no inorganic compounds were analyzed for at this site. Unless "process knowledge" or specific waste characterization analytical data preclude analyses for inorganics, additional soil analytical data should be required. (BPJ)

PRS 12-004(a)

2. Section 5.8.4 Field Investigation, Page 5-19: Recent radiological surveys showed that no readings greater than site-specific background. However, the result differs drastically from 1993 survey, which gave readings of approximately 10 times background. Why are the results so inconsistent? Can LANL justify the results of the recent survey? Please explain the variations in the two surveys. (BPJ)

PRS 12-004(b)

3. Section 5.9.4.3, Page 5-25: Both samples were taken next to the aluminum pipe instead of in the pipe as specified in the Work Plan. Given that the site has no documented history, there is no knowledge of the depth of the pipe, and no knowledge of site activities, LANL shall explain the reason why they did not sample inside the pipe? (BPJ)

PRS 14-002(b)

4. Page 5.13.3, Page 5-30: The site, as described in the Work Plan, was contaminated with uranium, lead and copper as well as explosives. That might explain why the pedestal was constructed of reinforced concrete which was 2 ft thick with a steel plate top and an 8-ft high earthen berm.

Interviews alone are not sufficient documentation to make an NFA determination. Site history and interviews can be used to guide an investigation or confirm other evidence, but are not sufficient by themselves. LANL's investigation does not meet NFA Criteria 1. (BPJ)

PRS 14-001(a-e)

5. Section 5.18, Page 5-35: Due to the fact that those PRSs are still associated with active firing sites and continue to be used, NFA will not be considered until decommissioning. (BPJ)

PRS 14-006

6. Section 5.22.7.1, Page 5-46: It states, "No inorganics were detected above

background UTLs and below SALs.", however, Table 5.22.5-1 listed 7 inorganics with concentrations greater than background UTL. Please explain the results. (BPJ)

7. Table 5.22.7-3, Page 5-49: the maximum normalized thallium concentration was calculated wrong. The value should be 0.5574 instead of 0.4928, therefore, the total should be 1.5530 instead of 1.4884. (BPJ)
8. Equation 1, Page C-4: LANL used this equation to calculate the Preliminary Remediation Goals (PRG) for PRS 14-006 COPCs. However, the default value for Target Cancer Risk (TR) in the equation is 1×10^{-6} , as given in Risk Assessment Guidance for Superfund (RAGS) Part B (EPA 1991, 1994). Please explain why LANL used 1×10^{-4} instead. LANL needs to recalculate the results using a TR of 1×10^{-6} . (BPJ)
9. Table C-1, Page C-6: Under the row for Lead in the Table, it states, "see Section 4.1.1 for Lead Discussion." However, Section 4.1.1 does not exist. LANL shall provide the missing section or an explanation for why it is missing. (BPJ)

AOC C-14-003

10. Section 5.23.7.1, Page 5-53: The Report states that HMX was **estimated** (emphasized) at a concentration below its SAL of 3300 mg/kg. Please list the resulting concentration for HMX if the concentration exceeds its background UTL and explain why this information was missing from the report. (BPJ)

Firing Pad Drainage

11. Sections 5.34.5 (Background Comparisons); Pages 5-89 and 5-91: Copper, lead, mercury and zinc were detected at concentrations above background, but below their respective SALs. Unless site-specific circumstances preclude the possibility of the lead leaching below 6 inches, LANL shall perform TCLP tests for lead. (BPJ)