



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

SEP 23 1994



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

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has reviewed and approves the RCRA Facility Investigation (RFI) work plan for Operable Unit 1093 with the enclosed modifications. The approved workplan shall consist of the RFI work plan submitted on May 14, 1993, the NOD response dated April 6, 1994 and the enclosed list of modifications. LANL shall immediately implement this work plan according to the proposed schedule.

Should you have any questions, please contact Barbara Driscoll of my staff at (214) 665-7441.

Sincerely yours,

*Jack Davis*

for Allyn M. Davis, Director  
Hazardous Waste Management Division

Enclosure (1)

cc: Kathleen Sisneros, Director  
Water and Waste Management Division  
New Mexico Environment Department

Jorg Jansen, Program Manager  
Environmental Restoration Program  
Los Alamos National Laboratory, M992



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**List of Modifications  
Operable Unit 1093**

1. The final RFI reports for Operable Unit 1093 SWMUs listed in the HSWA portion of the RCRA permit are due as indicated below:

<u>SWMU</u>	<u>RFI Report Due</u>
27-001	1/30/95
27-003	1/30/95
18-001 (a-c)	1/30/95
18-007	1/30/95
all others	10/31/95

2. LANL shall request a Class III permit modification upon submittal of any voluntary corrective action plans to EPA.

3. **NOD Response #3, Proposed Text Changes:** LANL shall change the last sentence of their text (paragraph 1) to read: "Final investigations and permanent corrective actions (if required) for active PRSs will be addressed as required by EPA even if the unit has not become inactive". EPA may require corrective action prior to the site becoming inactive depending on the situation at the site and the schedule for deactivation.

4. **NOD Response #6 -** LANL may submit a proposal to EPA to defer full characterization of a septic system until the unit is deactivated; however, EPA may require characterization and remediation prior to deactivation depending on the situations of each site.

5. **NOD Responses #11 and #12:** LANL may not use axial slices of each core (either 3 foot or 5 foot) for a sample. If field screening or visual inspection does not indicate potential contamination then a specific interval from each core should be sampled.

**Fact Sheet**  
**Los Alamos National Laboratory**  
**RFI Work Plan for Operable Unit 1093**

- \* Operable Unit 1093 (OU 1093) includes Technical Areas 18 and 27 which were first used during the Manhattan Project beginning in 1944. These sites were the location of experimental test shots, employing high explosives and various metals including depleted uranium.
- \* Twenty-two solid waste management units (SWMUs) are included in the HSWA portion of the RCRA permit. The SWMUs include inactive firing ranges, wastewater lagoons, materials disposal areas, septic systems, and a bazooka impact area.
- \* Areas within and around the firing sites will be surface sampled with deeper samples being collected in surface drainage areas where migration of contamination may occur. The septic systems and lines will be sampled at manholes, outfalls, inside the tanks, and borings will be put in the lagoons.
- \* Comments from NMED were incorporated into the NOD. The final NOD was discussed with NMED.

\* **Environmental Justice**

**Demographic Information**

16.2% Minority  
(For NM the percent minority is 49%)

13% Economically Stressed  
(For NM the % economically stressed is 31%)