JUL 15 1993

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

Re: RFI Work Plan for OU 1122, Approval
Los Alamos National Laboratory
NM0890010515

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) hereby approves your Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Work Plan for Operable Unit OU 1122 dated May 20, 1992, with the attached list of modifications. All requested information should be submitted within thirty (30) days of receipt of this letter.

EPA is not approving or providing comments on this work plan or work plan submittals for FY93 which address land use scenerios, risk assessment, and logic flow diagrams, as discussed with the Department of Energy (DOE) and Los Alamos National Laboratory (LANL). Rather the work group which has been formed with DOE, LANL, Sandia National Laboratory, and the New Mexico Environment Department will agree upon appropriate use of the above listed items. These items will be approved in a separate document which outlines the agreed upon usage.

You shall immediately initiate the implementation of this approved RFI work plan. If you have any questions, please contact Barbara Driscoll of my staff at (214) 655-7441.

Sincerely yours,

Allyn M. Davis, Director
Hazardous Waste Management Division (6H)

cc: Kathleen Sisneros, NMED
Al Tiedman, LANL, MS-A120

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MODIFICATIONS

1. The final report should be submitted within eight months of receipt of analytical data and completion of all field work.

2. **3.2.2.7 SWMU 33-011(d) Storage Area TA-33-20, p. 3-24** - How were materials stored (i.e. in drums)?

3. **3.2.4.2 Subsurface Data, p. 3-29** - Submit a list of the contaminants for which analysis was conducted.

4. **For all Surface investigations:** Elaborate on the sentences indicating that data will be summarized by estimating spatial trends and local average concentrations as a function of distance of the sources.

5. **Section 3.5.4 Review of Existing Data, p. 3-72** - More information needs to be provided on the Roy F. Weston 1989 sampling of the two chambers in MDA-D. This information should include a map indicating the location of the boreholes, depths of sampling intervals, and tabulated results of the sampling and analysis.

6. **4.1.4 Sampling and Analysis Strategies, p. 4-5 and 4-7** - For any sample collected the sample maximum should be compared with action levels.

7. **4.2.6 Subsurface Sampling at MDA-K, p 4-28** - For each of the three cores drilled, a sample should be collected every 10 feet to a depth of 30 feet, and these samples should be analyzed for organics and metals. Sampling below 30 feet may continue as indicated in the work plan.

8. **For all septic systems subsurface sampling:** The sample collected next to the tank from the bottom of the tank should also be analyzed for VOAs.

9. **4.4.4 MDA-E, p. 4-38** - The sampling and analysis already conducted did not cover all the potential constituents in the pits at MDA-E. LANL shall drill two extra boreholes close to pits and sample for beryllium and explosives every 10 feet to a depth of 40 feet.

Chapter 5, No Further Action units:
The following sites do not need further investigation and do not need to be added to the permit:

SWMU 33-004(n)
SWMU 33-004(l)
SWMU 33-012(b-d)

In addition, SWMUs 33-004(e and f) will need to be proposed for removal under a Class III permit modification prior to approval.

FACT SHEET
Los Alamos National Laboratory
Operable Unit 1122

* Operable Unit 1122 (OU 1122) includes Technical Areas (TA) 33 and 70. TA-33 and TA-70 are located on the southeast boundary of Los Alamos (LANL).

* TA-33 was created in 1947 as a test site for weapons experiments using conventional high explosives, uranium, beryllium and polonium radiation sources. There are 59 Solid Waste Management Units (SWMUs) within TA-33.

* TA-70 has never been used for any experimental purposes by LANL, and contains no SWMUs.

* Primary contaminants at TA-33 consist of uranium, beryllium, high explosives residues, and tritium. Other minor contaminants include: plutonium, cadmium, silver, lead, mercury, and solvents.

* This work plan addresses phase I of a multiphase sampling approach.