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October 7, 1993

Ms. Diana Webb, LANL/AIP/POC
 LAAO, 528 35th Street
 Los Alamos, NM 87544

OU 1122

RE: Review of LANL's RCRA Facility Investigation (RFI) Work Plan for Operable Unit (OU) 1122

Dear Ms. Webb:

The enclosed attachment provides the Department of Energy (DOE) the Agreement-in Principle's (AIP) technical comments for the above referenced RFI Work Plan as received by the Hazardous and Radioactive Materials Bureau's Technical Compliance Program.

Thank you for your prompt attention to this matter.

Sincerely,

Bruce Swanton, LANL/AIP/POC, Program Manager
 Hazardous and Radioactive Materials Bureau

BS/tm
 Attachment

- cc: Benito Garcia, HRMB Bureau Chief
- Steve Alexander, Technical Compliance Program Manager
- Barbara Hoditscheck, RCRA Program Manager
- Neil Weber, DOE Oversight Bureau Chief
- Tim Michael, DOE Oversight AIP Technical Staff
- Glen Saums, SWQB Program Manager
- Dennis McQuillan, GWPRB Program Manager
- Barbara Driscoll, EPA Region 6
- Roy Michelotti, LANL OUPL
- File LANL/RED/93



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MEMORANDUM

**TO: STEVE ALEXANDER, RCRA TECHNICAL COMPLIANCE PROGRAM
MANAGER**

**THROUGH: BRUCE SWANTON, POC
AIP DOE/LANL**

FROM: TIM MICHAEL, AIP

DATE: SEPTEMBER 28, 1993

**RE: REVIEW OF THE LOS ALAMOS NATIONAL LABORATORY RCRA
FACILITY INVESTIGATION WORK PLAN FOR OPERABLE UNIT 1122**

The Hazardous and Radioactive Materials Bureau (HRMB), under the Agreement in Principle (AIP) program, has completed its review of the Los Alamos National Laboratory RCRA Facilities Investigation for Operable Unit 1122. The AIP program is submitting these HSWA related comments and recommendations to the HRMB's RCRA Permitting, Enforcement, and Technical Compliance Programs in anticipation of eventual New Mexico HSWA authorization. Comments are keyed to the section number of the document, as well as to the paragraph (p). Page numbers are also indicated.

General Comments

1. Section 2.6.p5, page 2-9 of the Work Plan states that the aquifer probably lies at a depth of about 900 feet.

According to the 1991 LANL Environmental Surveillance Report, in 1982 the depth to water at TA-49 was 1006 feet, an elevation of approximately 6013 feet. Doe and Ancho springs, southeast of Main Site, are at elevations of 5600 and 5700 feet, respectively. Based on this, depth to water at Main Site (elevation 6500 feet) is in the range of 500 to 900 feet.

In order to assess the potential for ground water contamination, it is important to know the depth to water. For this reason, we recommend that an attempt be made to more accurately characterize the depth to ground water, including both the main and any perched aquifers.

2. Vertical boreholes are proposed for MDA-K at Main Site. Nearly vertical fractures, characteristic of the geology at Main Site, may provide pathways for contaminant migration. It may not be possible to adequately characterize migration pathways based on evidence from vertical drilling. Therefore, we recommend that angled boreholes be used as part of a program to more adequately characterize potential migration paths and the subsurface in general.

Specific Comments

1. [4.5.3.1, page 4-43]

This section mentions surface sampling of 33-003(b). However, no surface sampling is listed for 33-003(a). Is 33-003(a) included in the 50 foot grid over the northwest end of MDA-D? The rationale for lack of surface sampling should be clarified.

2. [Table 3-9, page 3-67 and Table 4-D, page 4-53]

The Phase 1 approach to 33-003(a) and 33-003(b) is unclear. In Table 3-9, for 33-003(a), the Phase 1 approach is listed as "reconnaissance", and in Table 4-D, it is not listed at all. Also, in Table 3-9, 33-003(b) is shown as NFA, and it is not listed as NFA in Chapter 5. These inconsistencies should be clarified.

3. [3.5.2.1.2.p2, page 3-69]

"...but beryllium, polonium-210, and high explosives were present."

How much beryllium was originally placed in these chambers?

4. [4.1.3.p1, page 4-5 and 4.1.4. Table 4-3, page 4-7]

What methods will be used to analyze for herbicides and pesticides?

5. [4.4.4, page 4-38]

The plan for MDA-E does not include sampling of the pits or surrounding area. We understand that disposition of MDA-E is currently undergoing formal decision analysis. The results of this analysis and the details of the sampling plan should be provided to NMED when they are available.

6. [5.0, page 5-1]

A tour of No Further Action (NFA) units by NMED/AIP, possibly supplemented by an NMED/AIP review of archival data, will be necessary before NMED/AIP can provide comment on the adequacy of NFA recommendations to the Technical Compliance Program. Observations made at NFA units by AIP staff will be reported to your program as an addendum to this review.

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7. [5.1, page 5-1]

Regarding SWMU 33-004(e) TA-33-169 septic tank, it is not clear whether samples were taken and analyzed when this site was cleaned in 1989. Since such data are important in evaluating an NFA recommendation, this information should be provided if it is available.

If you have any questions regarding this review, please contact Tim Michael with the Agreement in Principle program at the Hazardous and Radioactive Materials Bureau of the New Mexico Environment Department at (505) 827-4308.

File:lanl:OU1122:RFIREV9/28