

1/31/94

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OU 1130

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

Re: Notice of Deficiency, RFI Work Plan OU 1130
Los Alamos National Laboratory
NM0890010515

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has reviewed the RCRA Facility Investigation (RFI) Work Plan for Operable Unit 1130 (OU 1130) dated June 9, 1993 and found it to be deficient. Enclosed is a list of deficiencies which need to be addressed within thirty (30) days of receipt of this letter.

Should you have any questions, please contact Barbara Driscoll at (214) 655-7441.

Sincerely,

William K. Honker, P.E.
Chief
RCRA Permits Branch (6H-P)

Enclosure

cc: Benito Garcia, NMED
Robert Vocke, LANL, EM-13

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**Notice of Deficiency
Los Alamos National Laboratory
OU 1130**

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General Comment:

All baseline risk assessments should follow the guidelines set by the Technical Assumptions Task Force which indicate that a residential scenerio should be used unless an agreement as to future land use has been made. This work plan does not need to be revised to change all the risk assessment scenerios. However, it should be noted that any risk assessments conducted should meet the above-mentioned requirements until future land use determinations have been made.

Specific Comments:

1. LANL shall provide a detailed schedule of fieldwork dates, and report dates for this work plan.
2. 3.5.1.2 Infiltration of Surface Water, p. 3-23 - Figure 3.7 does not show the location of the discharge sink in Potrillo Canyon as mentioned in the text. LANL should provide a revised figure showing the location of this sink.
3. 4.2.3 Voluntary Corrective Actions, p. 4-8 - The ER program will not formally solicit EPA approval for VCAs until it requests final approval of the cleanup. WRONG. Still SWMUs and as such they are under a schedule for investigation, and approval of work conducted is still up to EPA not DOE
4. 4.4.1 Criteria for Recommending NFA, p. 4-28 - Criterion 3 should be changed to indicate that for a baseline risk assessment for carcinogens a risk of 10^{-6} , and a hazard index less than 1 for noncarcinogens is required for a NFA recommendation.
5. 5.2.5.3 Sampling Sump, p. 5-20 - Should boreholes be required for this unit then at least one of the outer holes should be located on the down gradient side.
6. 5.3.5.1.3 Sampling, p. 5-31 - LANL shall place at least one of the boreholes to be drilled in the leachfield where the line from the septic tank enters the leachfield. The rest of the boreholes may be randomized.
7. 5.4.1.3 PRS 36-004(c): Minie Firing Site, p. 5-38 - The second paragraph of this section indicates that there is a permitted open burning (detonation) site within this firing site. Is text referring to TA-36 building 8 which has interim status? If not then what is the unit text is referring to?
7. 5.4.1.4 PRS 36-004(d): Lower Slobbovia Firing Site, p. 5-38 - LANL shall provide more information on the Skunk Works site, such as type of activities and contaminants from this site. All other

firing sites appear to be used for their intended purpose which is research, and as long as they are active they are not SWMUs. However, Skunk Works has been inactive since the mid-1950's and should be addressed as a SWMU now. LANL should submit a sampling schedule for this site along with the other requested information.

8. 5.4.5.4 Burning Pit Sampling, p. 5-49 - Sampling of these burning pits is not deferred and LANL shall submit a sampling schedule.

9. 5.7.4 Data Needs and Data Quality Objectives, Photo Outfall, p. 5-67 - LANL shall sample closer to the outfall than 170 feet. Even though the side of the canyon are steep and there may not be an accumulation point closer to the outlet, contaminants may have infiltrated sediment closer to the outlet. LANL should make an effort to sample in the drainage path as close to the outlet as possible. In addition, this unit should be added to the permit as a SWMU as it has not been under an NPDES permit for the entire time of operation.

10. Many of the sites mention analysis for mercury, but it is not listed (checked) on the Summary of Sampling and Analyses for PRS's Tables 5-3, 5-5, 5-7, 5-9, and 5-10. The analytical method for mercury should also be indicated. LANL shall resubmit revised tables showing all analyses.

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