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LANL

February 23, 1994



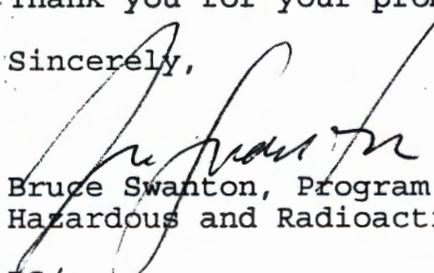
Ms. Diana Webb, LANL/AIP/POC
LAAO, 528 35th Street
Los Alamos, NM 87544

RE: Review of LANL's June 1993 RCRA Facility Investigation
(RFI) Work Plan for Operable Unit 1130

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 (HRMB) Technical Compliance Program. Thank you for your prompt attention to this matter.

Sincerely,


Bruce Swanton, Program Manager, DOE/EM Oversight
Hazardous and Radioactive Materials Bureau

BS/sy
Attachment

- cc: Benito Garcia, HRMB Bureau Chief
- Steve Alexander, HRMB
- Barbara Hoditscheck, HRMB
- Neil Weber, DOE Oversight Bureau Chief
- Steve Yanicak, HRMB AIP/LANL
- File LANL/RED/94
- Glen Saums, SWQB Program Manager
- Dennis McQuillan, GWPRB Program Manager
- Barbara Driscoll, EPA Region 6
- Gene Gould, LANL OUPL



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M E M O R A N D U M

TO: Steve Alexander, Program Manager, NMED/RCRA Technical Program

THROUGH: Bruce Swanton, Program Manager, DOE/EM Oversight
Teri Davis, Supervisor, AIP/LANL

FROM: Steve Yanicak, NMED AIP/LANL

DATE: February 10, 1994

SUBJECT: Review Of LANL's Operable Unit 1130 RFI Work Plan,
submitted June 1993.

The Hazardous and Radioactive Materials Bureau (HRMB) Agreement in Principle (AIP) staff have completed the review of the operable unit (OU) 1130 RCRA facility investigation (RFI) work plan. This memo details the comments stemming from the review. For clarity, the memo contains numbered items listing comments that are keyed to a specific section number or figure in the RFI, as well as to the paragraph, e.g., Item 2. (4.4.4.4 p2). The memo distinguishes between Hazardous and Solid Waste Amendment (HWSA) issues and non-HWSA issues. The AIP program is submitting these HWSA-related comments and technical recommendations to the HRMB's Enforcement/Technical Programs because of eventual New Mexico HWSA authorization. Non-RCRA issues are those that are provided in this memo for the sake of completeness of the work plan review.

RCRA-RELATED ISSUES

Item

1. **SPECIFIC COMMENT (3.5.1.2 p2)** The discharge sink in Potrillo Canyon might be related to a segment of the Guaje Mountain Fault. Additional characterization of the discharge sink is needed to assess it's role as a significant contaminant pathway for infiltration to the main aquifer or a perched/intermediate zone, should it exist.
2. **SPECIFIC COMMENT (3.5.1.2 p2)** The RFI Work Plan is not clear as to whether the discharge sink in Potrillo Canyon will be added to the RFI as a solid waste management unit (SWMU) and/or be addressed during decontamination and decommissioning (D & D) of the firing sites?

3. **SPECIFIC COMMENT (3.5.3.1 p4)** Alluvial wells WCO-1, WCO-2, & WCO-3 in Water Canyon and FCO-1 in lower Fence Canyon should be monitored during spring runoff and after significant precipitation events. Although these wells were initially dry when developed, it is not certain whether these wells are continuously dry.
4. **SPECIFIC COMMENT (Figure 3.7)** The groundwater hydraulic velocity and hydrologic flow direction as proposed in this figure of the work plan are questionable because there is insufficient well data (well control) at OU 1130.
5. **SPECIFIC COMMENT (4.2.3)** It is understood that any area of concern (AOC), potential release site (PRS), or SWMU scheduled for a voluntary corrective action (VCA) is done at LANL's own risk. Under eventual HWSA authority, the state of New Mexico could revisit all AOC's/PRS's/SWMU's for evaluation at any time in the future.
6. **GENERAL COMMENT** There are no sampling schedules or sampling dates mentioned anywhere in the RFI for the Phase I sampling plans.
7. **SPECIFIC COMMENT (5.5.2.2 p1)** The mesa top geology and structure of OU 1130 has not been adequately characterized to suggest that aqueous transport of potential contaminants through the Bandelier Tuff is not a viable migration mechanism.
8. **GENERAL COMMENT** Most of the sampling plans mention sampling for mercury (Hg) analysis, 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, & 5-10). Additionally, the off-site laboratory analysis method(s) for Hg is not specified on any of the sampling plan Tables. Any off-site laboratory analysis for Hg should use a method that has a limit of detection (LOD) less than the screening action levels (SAL's).
9. **GENERAL COMMENT** Figure 3.7 does not show the location of the discharge sink in Potrillo Canyon as mentioned in the text (3.5.1.2 p2).
10. **SPECIFIC COMMENT The Sump, (PRS 36-002) [5.2.5.3 p2]** The three core holes randomly selected outside the perimeter of the sump do not adequately address all vadose zone potential COC migration pathways. At least one outside perimeter core hole should address the topographic direction down gradient relative to the sump.

11. **SPECIFIC COMMENT Aggregate Septic Systems, (PRS 36-003(a) & 36-003(b)) [Figure 5-5]** Why is Septic Tank 36-003(b) outfall pipe shown if it hasn't been located yet? Approximate sample locations have been assigned to this unlocated unit as if it does exist as located on the map (Appendix C, Figure C-3, pg. 27).
12. **SPECIFIC COMMENT Aggregate Active Firing Sites, (PRS 36-004[a,b,c,d, & e]) [5.4.4 p2]** If Phase I sampling in Water, Fence and Potrillo Canyons shows contaminants of concern (COC's) above SAL's will the canyons be sufficiently and continuously monitored to address COC's from the active firing sites until D & D? How will control of contamination migration be implemented?
13. **SPECIFIC COMMENT Aggregate Active Firing Sites, (PRS 36-004[a,b,c,d, & e]) (5.4.4 p2)** Phase I sampling should also address Threemile Canyon and Pajarito Canyon (both within the hazardous radii of Firing Site IJ and Skunk Works/Lower Slobbovia respectively), just beyond the boundary of **OU 1130 (Figure 5-7). This should be done in coordination with activities at OU 1093.**
14. **SPECIFIC COMMENT Aggregate Active Firing Sites, (PRS 36-004[a,b,c,d, & e]) (5.4.5.3)** Surface-water and sediment-sampling points in Water, Fence and Potrillo Canyons (as determined by the geomorphic study), should be spaced adequately apart and encompass a distance of at least one quarter mile down gradient from the boundary of the active firing site(s) hazardous radii.

NO FURTHER ACTION (NFA) COMMENTS

15. **GENERAL COMMENT** Although major technical aspects of PRS's/SWMU's proposed for NFA are adequately addressed, **it is the policy of the AIP to inspect the proposed sites before an NFA candidate is given full consideration. A final determination of NFA suitability will be forwarded in a memo from AIP to the NMED, RCRA Technical Compliance Program following a site visit.**
16. **GENERAL COMMENT** When proposing a SWMU/AOC for NFA based on archival data, **the archival information should be made available for review.** If sufficiently concise, archival data could be submitted as an addendum to the RFI work plan (e.g., The OU-1078 addendum containing 24 sites proposed for NFA).

Steve Alexander
February 10, 1994
Page 4.

NON-RCRA ISSUES

17. **GENERAL COMMENT** There is no mention of asbestos sampling in any of the sampling plans in the RFI. Even though asbestos is not a RCRA-regulated hazardous substance, it should be addressed in the cumulative risk assessment if it is thought to be present at any of the AOC's/SWMU's.