

Department of Energy
Field Office, Albuquerque
Los Alamos Area Office
Los Alamos, New Mexico 87544

OCT 26 1994

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William K. Honker, Chief
RCRA Permits Branch
U. S. Environmental Protection Agency
Region 6
1445 Ross Ave., Suite 1200
Dallas, TX 75202-2733

Dear Mr. Honker:

Enclosed is LANL's request for deferred action on two PRSs at OU 1130 for which EPA has imposed RFI report due dates. We cannot meet these due dates, as both sites, 36-004(d) and 36-006, are active firing sites or are immediately adjacent (within 100 feet) to active firing sites. Any immediate investigation and potential cleanup activity would be negated by ongoing shots which would impact both sites with shot debris. We request that investigation and potential cleanup be deferred until the sites are decommissioned.

If any questions arise, please call me at (505) 665-7203.

Sincerely,

Theodore J. Taylor
Program Manager
Environmental Restoration Program

LAAMEP:8TT-001

Enclosure

cc:
See page 2



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TL

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William K. Honker

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cc w/enclosure:

B. Garcia

Hazardous Waste Bureau
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G. Gould, ESA-DE, LANL, MS-G787

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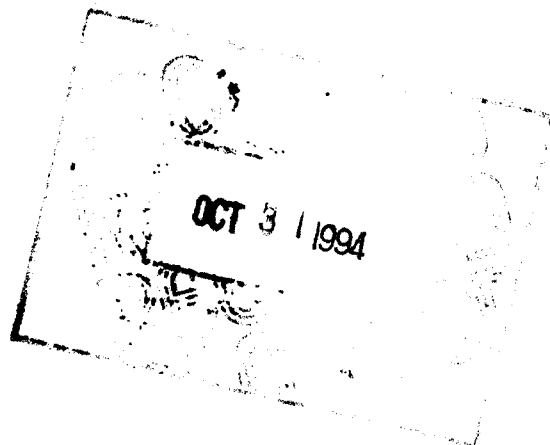
K. Schenck, Scientech, LAAO

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Los Alamos
NATIONAL LABORATORY
memorandum

Engineering Sciences and Applications Division
ESA-DE - Design Engineering

To/MS: T. J. Taylor, LAAO, MS A316
Thru: D. McInroy, MS M992
From/MS: T. E. Gene Gould, MS G787
Phone/FAX: 7-0402/FAX 5-1976
Symbol: ESA-DE-94-251
Date: October 20, 1994

**SUBJECT: REQUEST FOR DEFERRED ACTION - PRSs 36-004(d) and 36-006
OU 1130**

Per the Environmental Protection Agency's request, we are providing this information on PRS's 36-004(d) and 36-006 which are part of Field Unit 2, OU 1130. This information contains the justification for the deferred action of these units.

PRS 36-004(d) - Lower Slobbovia Firing Site

Lower Slobbovia is an active firing site. Investigation and remediation of PRS 36-004(d), as well as the other active firing sites in OU 1130, will be deferred until site decommissioning. The concern of the Laboratory is to ensure that these sites pose no current risk to the general public or environment. The Environmental Restoration (ER) Program is assessing the transport of contaminants through the surface water pathway outside the operational boundaries of the active firing sites. To date, 16 sediment samples and 2 water samples have been collected from the canyons draining the active firing sites. In addition, the Burn Pits, also part of PRS 36-004(d), will be investigated during the 1994 field season. This investigation is being pursued before the decommissioning of Lower Slobbovia because the Burn Pits are a potential subsurface contamination problem that is not impacted by current site activities.

PRS 36-006 - Surface Disposal Area

This PRS is within 100 feet of the active Eenie firing pad. The area has been impacted by shots in the past and currently receives shot debris from Eenie Site. Because the disposal area is a surface contamination problem with potential contaminants of concern similar to the firing sites, an investigation could not effectively assess contamination resulting explicitly from the surface disposal area. Furthermore, the site will continue to receive debris (and potential contamination) from the Eenie Site and cannot currently be remediated should investigation indicate that site clean-up is warranted. Therefore, investigation and remediation of PRS 36-006 will be deferred until the Eenie Site is decommissioned.

If you have any further questions in this regard, please feel free to contact me.

TEG/ww

cy: B. Enz, Scientech, LAAO, MS A316
L. Kidman, ICF Kaiser, MS M703
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OU 1130 Project File