



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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FEB 24 1995

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Mr. Joseph C. Vozella
Acting Assistant Area Manager
Environment and Projects
Department of Energy
Los Alamos Area Office
Los Alamos, NM 87545

File LANL
NSWA

Re: Sampling Plan for Operable Unit 1130
SWMUs 36-004(d) and 36-006
Los Alamos National Laboratory (NM0890010515)

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has reviewed the Notice of Deficiency Response dated January 25, 1995, for Operable Unit 1130 which included sampling plans for the solid waste management units (SWMUs) 36-004(d) and 36-006, and found it to be deficient. Enclosed is a list of deficiencies which should be addressed within 30 days from receipt of this letter.

Many of the deficiencies noted in this submittal are deficiencies which are previously and often been cited by EPA, including a lack of detailed figures and sampling information. The quality of submittals which EPA is now receiving should be improving rather than being of similar quality with submittals from two years ago. Operable Unit leaders should be aware of deficiency comments from previous work plans, so as not to repeat previous mistakes. Scoping meetings with EPA and NMED prior to writing major workplans or reports may be helpful.

Should you have any questions, please feel free to contact Ms. Barbara Driscoll at (214) 665-7441.

Sincerely,

William K. Honker

William K. Honker, P.E., Chief
RCRA Permits Branch

Enclosure

cc: Mr. Benito Garcia ✓
New Mexico Environment Department
Mr. Jorg Jansen
Los Alamos National Laboratory, MS M992



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List of Deficiencies
Operable Unit 1130
SWMUs 36-004(d) and 36-006

General Comments:

1. LANL needs to provide a schedule for both units for fieldwork (initiation and termination) and submittal of an RFI report.
2. Both sampling plans indicate that data gathered will be compared to screening action levels to determine if contaminants are present at levels of concern. LANL will need to compare with action levels to determine if additional action such as an expedited cleanup or Corrective Measure Study are necessary. LANL will also need to compare data with background information for inorganics to determine if the extent of contamination is bounded.

Specific Comments:

SWMU 36-004(d) - 5.3 Sampling, p. 8:

3. LANL needs to provide a figure detailing the area to be sampled. This should include the firing site, battery disposal area and drainage system. More than one figure may be required to provide the detail required.
4. LANL needs to elaborate on the size of the quadrants which are going to be field screened or sampled. These quadrants should be indicated on the above figure.
5. LANL needs to provide additional information on the Laser-induced breakdown spectroscopy (LIBS) method such as publications on use and application. What is the accuracy of this method as a field screening tool for inorganics? The January, 1995 edition of "Environmental Technologies" by LANL that this is a developing rather than proven technology.

SWMU 36-006 -

6. What is the approximate average thickness of the material which forms this surface disposal area? How thick is the material at the edge of the canyon and at the base of the canyon? Can LANL provide a rough schematic of the profile of this surface disposal area?
7. **5.3 Sampling -** Sampling plans for surface and subsurface samples within the surface disposal area are unclear. If the subsurface migration scenarios details that the primary contaminants will percolate along the soil/tuff interface, why is this interface not being sampled? The surface samples proposed do not appear to meet the migration scenario, and subsurface samples along the base of the disposal area would provide better information.