



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

Steve
~~*Steve*~~
~~*Barbara*~~
file LANL
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MAR 28 1994

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

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

Re: Notice of Deficiency, **Operable Unit 1132**
Los Alamos National Laboratory, NM0890010515

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has reviewed the Resource Conservation and Recovery Act (RCRA) Facility Investigation Work Plan for Operable Unit 1132, and found it to be deficient. Enclosed is a list of deficiencies for which a response is required to the specific comments within thirty days from 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)

cc: Benito Garcia, NMED
Dave McInroy, LANL EM-13

Enclosure



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List of Deficiencies

General Comments:

1. **5.1.3 Potential Remediation Alternatives, p. 5-7** - Stabilization in place of a landfill may not be a suitable remedy for wastes buried in a floodplain.
2. All sites requested for NFA do not need to be added to the HSWA portion of the permit.
3. Appendix B does not state the detection capabilities of the field screening instruments discussed. This information should be provided in order to compare which instruments are capable of detecting target species below their screening action levels with adequate accuracy and precision. Please ensure that the information on high explosive field screening instruments are included.

Specific Comments:

1. **1.3 Description of OU 1132, p. 1-11** - The sentence at the bottom of the last paragraph for this section indicates that "EPA's approval of this work plan has the effect of delisting NFA SWMUs unless otherwise specified by that agency". Official delisting is by permit modification, if the unit is listed in the HSWA permit for investigation.
2. **Table 4-3, p. 4-18** - A voluntary corrective action will probably not be an acceptable alternative for a firing site based on the size and area of the potential contamination.
3. **5.1.1.2 PRS 39-001(b), p. 5-2** - In the second paragraph text indicates that Pit 2 may have been enlarged to prolong its use until about 1986. If hazardous waste was placed in this unit then this would be a RCRA regulated unit. Does LANL have any records of the type of waste which may have been placed in this pit?
4. **5.1.4.1.2 Environmental Characterization, p. 5-8** - Since LANL is already drilling four boreholes to a depth of 100 feet or 20 feet below the alluvium, EPA recommends extending one of this boreholes to determine if a perched intermediate aquifer exists in this zone. Which borehole is chosen should be approved by NMED and EPA.
5. **SWMUs 39-004(a and b), p. 5-23** - These units need to be added to the permit as the type of use for these firing sites has changed since the units were first used. Mercury and depleted uranium were previously used, but are no longer being used.
6. **5.3.1.1.2 PRS 39-008: Soil Contamination at the Gas-Gun Site, p. 5-26** - This debris mound is considered a SWMU by EPA and

needs to be added to the permit.

7. 5.3.4.1.2.2 Soils Characterization, p. 5-30 - The necessary of collecting these samples in addition to the ones collected in potentially contaminated areas is not clear. However, should LANL collect these samples then additional analyses should be included in order to use the sampling results for background samples if appropriate.

8. 5.4.1.1.3.3 Chemical Seepage Pit (inactive), p. 5-48 - Sampling should continue to at least 10 feet below the bottom of the pit especially since sampling is not occurring in the pit. If known, the depth of the pit should be provided.

9. Annex I: A field work schedule needs to be provided. What is the rationale for the final RFI report being transmitted 2/20/97? LANL shall provide a detailed sampling schedule.