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HSWA LANL 2/1132 A 39

M E M O R A N D U M

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

FROM: Bruce Swanton, Program Manager
DOE EM Oversight Program
LANL AIP P.O.C.

ENTERED

DATE: April 11, 1994

SUBJECT: **Review of LANL June 15, 1993 RCRA Facility Workplan for Operable Unit 1132**

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The Hazardous and Radioactive Materials Bureau (**HRMB**) Agreement in Principle (**AIP**) staff have completed their review of the Operable Unit (**OU**) Resource Conservation and Recovery Act Facility Workplan (**RFIW**) for OU-1132.

The comments are listed by item number and are also keyed to the page, section, paragraph, table, figure or bullet number used in the Los Alamos National Laboratory (**LANL**) document.

General Comments

Appendix B does not state the detection capabilities of the field-screening instruments discussed. We cannot determine if the instruments proposed are capable of consistently detecting target species below their screening action levels with adequate accuracy and precision.

Specific Comments

Item Number

1. (Page 4-2, 4.2.3.2) The 'Recreational Scenario' cannot be assumed but must be accepted after full stakeholder involvement.

2. (Page 4-6, t4-1) Screening action levels for incomplete

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combustion products (e.g., benzo(a)anthracene) are listed as not available. Calculated SAL's are available in Appendix J, Table J-1 of the 1993 Installation Work Plan. SAL's are also available for the high explosives or their components (e.g., HMX, barium nitrate, RDX) in this table.

3. (Page 4-18, t4-3) This table indicates that voluntary corrective action may eventually be proposed for all active firing sites. We do not see the applicability of the VCA approach to such large, ill-defined sites. Our understanding is that VCA is appropriate where sites are well defined and where the remedy is obvious.

4. (Page 5-2, 5.1.1.1.2) "Francis further suggests that Pit 2 may have been enlarged to prolong its use until about 1986..." Unless on-site procedures employed after the promulgation of RCRA prevented the disposal of hazardous wastes in Pit 2, this unit could be a non-HSWA, RCRA hazardous waste site. LANL site representatives have verbally indicated that administrative controls were likely to have been put in place to exclude hazardous wastes from this unit prior to RCRA promulgation in 1980 but the RFI does not provide this information.

5. (Page 5-7, 5.1.3) Stabilization in place may not be a suitable remedy for toxic wastes buried in a floodplain; however, see item number 9, below.

6. (Page 5-30, 5.3.4.1.2.2) Determinations of soil saturated hydraulic conductivity, porosity, bulk density, cation-exchange capacity, pH or particle size may not enhance predictions of contaminant fate or of susceptibility to migration to the sufficiently that direct investigation (i.e., direct analysis of core material) would be unnecessary.

7. (Page 3-16, 3.7.2.2.1) "It is not known whether a perched alluvial reservoir is present under the northern fork of Ancho Canyon..." It is also not known whether a perched intermediate aquifer exists in this location. A high-volume spring is reported to exist below the confluence of Ancho and North Fork Ancho canyons at an elevation which would seem to indicate that a source aquifer does exist below the depth typical of an alluvial aquifer and above the depth of the main aquifer, i.e., at a depth more characteristic of an intermediate, perched aquifer.

8. (Page 5-8, 5.1.4.1.2) "The coreholes will extend 20 ft below the alluvium or to a total depth of 100 ft, whichever is less." There are no provisions in the RFIW for determining the

presence or absence of a perched intermediate aquifer. We recommend extending one or more of the planned boreholes to make this determination. Selection of the most effective location(s) for this purpose should be done in concert with State, federal and tribal representatives.

9. (Page 5-8, 5.1.4.1.2) "Surface characteristics of the canyon bottom suggest it is being filled in; if this is true, in-situ stabilization could be an effective remediation." The canyon bottom may currently be in the process of in-filling, yet infrequent catastrophic floods may periodically remove this fill material. The proposed trenching study may provide a definitive answer to this question.

cc: EMOP Files