



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



DEC 10 1993

2133
TA-42

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

Dear Mr. Honker:

Enclosed is the response to your Notice of Deficiency for Operable Unit 1129 Aggregate J.

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

Sincerely,

Theodore J. Taylor, Manager
Environmental Restoration Program
Environmental, Safety, and Health
Branch

LESH:4SS-001

Enclosure

cc w/enclosure:
T. Taylor, ES&H, LAAO
S. Slaten, ES&H, LAAO
D. Webb, ES&H, LAAO
K. Schenck, Scientech/LAAO
RPF, LANL, MS-M707
K. Bitner, ERPO, AL,
MS-A906

cc w/o enclosure:
R. Harris, EM-452, HQ
J. Vozella, ES&H, LAAO
J. Shipley, ERWM, UC-LANL,
MS-J591



2513

CERTIFICATION

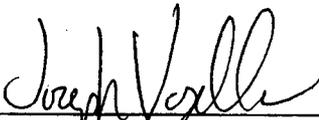
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violation.

Document Title:

Final Notice of Deficiency (NOD) Response for OU 1129

Name: 
James Jackson
Deputy Director
Los Alamos National Laboratory

Date: 4/30/93

Name: 
Joseph Vozella
Chief
Environmental Safety & Health Branch
Los Alamos Area Office

Date: 12/9/93

Los Alamos
NATIONAL LABORATORY
memorandum

Earth & Environmental Sciences Division
EES-13 • Nuclear Waste Management R&D

To/MS: Tracy Glatzmaier, EM-13, MS M992
Thru/MS: Allyn Pratt, EES-13, J521 *AK*
From/MS: Gabriela Gainer, LATA, M321 *GG*
Phone/FAX: 662-1817/6621846
Symbol: EES-13-ER-11-93-014
Date: November 29, 1993

Revised Response to the OU 1129 RFI Work Plan Appendix E NOD

Per our conversation on November 29, 1993, I have enclosed the revised comment response to the referenced NOD, which incorporates comments from the DOE.

Included in this transmittal are the revised graphics in Appendix E of the Work Plan that replace the figures in the transmittal of November 19, 1993. I am also enclosing another three copies of the complete package for you to send to the EPA and the DOE. This package includes

- revised NOD responses,
- Appendix E of the Work Plan (with revisions)
- preliminary draft of *OU 1129 Accelerated Characterization at Former TA-42 in Support of Construction Validation Project at Los Alamos National Laboratory (LANL)*, and
- correspondence related to the revision of the Aggregate J sampling and analysis plan and the accelerated characterization at TA-42.

Please call me at 662-1817 if you have any problems or questions regarding this transmittal.

Enclosures: a/s

Cy:

Curt Thomson, LATA, M321, w/NOD responses only
Records-Processing Facility, EM-13, M707, w/NOD responses only
EES-13 ER file, J521, w/NOD responses only
OU 1129 file, M321, w/NOD responses only

EPA Notice of Deficiencies and OU 1129 Corresponding Responses for the RFI Work Plan, Aggregate J

1. **Within 30 days of receipt of this letter, Los Alamos National Laboratory (LANL) shall provide figures for Appendix E that clearly delineate where all samples were collected for this 1991 sampling and this revised Aggregate J work plan.**

Figure 2 in Appendix E shows the location of the samples that were collected as part of the reconnaissance survey in 1991—as indicated by the prefix “PF” (for example, PF-PLN). Figure 2 in Appendix E also shows the location of the samples that were collected during the July 1992 investigation—as indicated by the “B” designation (for example, B1).

Included as part of this notice of deficiency (NOD) response package is the preliminary draft of *OU 1129 Accelerated Characterization at Former TA-42 in Support of Construction Validation Project at Los Alamos National Laboratory (LANL)*. This internal Laboratory report is being prepared for the sponsors of the Nuclear Safeguards Technology Laboratory (NSTL). Appendix A (Facility for Information Management, Analysis, and Display [FIMAD] map) of the report also shows the surveyed locations where the July 1992 samples were collected. The map also shows the location of the samples that were collected during the reconnaissance survey in January 1991.

2. **This work plan is dated July 24, 1992, and was not submitted to the Environmental Protection Agency (EPA) until October 1993. LANL voluntarily accelerated the investigation of this area to provide for the construction of the NSTL, and this action should not be considered an interim action under the Hazardous and Solid Waste Amendments (HSWA) permit as is indicated on page 4 of Appendix E. This page needs to be changed.**

As EPA has pointed out, the choice of the term “interim action” to describe the effort is not appropriate. Based on EPA guidance, page 4 of Appendix E has been changed by deleting any references to the interim action, the installation work plan (IWP), and the HSWA permit. Also, the words “interim action” were replaced with “accelerated characterization” elsewhere in Appendix E.

The *Revised Sampling and Analysis Plan for OU 1129 Aggregate J* (LA-UR-92-2120) was not intended to be a separate Resource Conservation and Recovery Act (RCRA) facility investigation (RFI) work plan. The *RFI Work Plan for Operable Unit 1129* (LA-UR-92-800) (hereafter referred to as the Work Plan) was submitted to the EPA on May 22, 1992. The five potential release sites (PRs) listed in Section 7.14 of Chapter 7 of the Work Plan are the same five PRs listed in revised Aggregate J, which is now referred to as Appendix E of the Work Plan. New PRs are not being added to the Work Plan.

The *Revised Sampling and Analysis Plan for OU 1129 Aggregate J* (LA-UR-92-2120) was created in July 1992 to achieve an accelerated characterization to support a critical construction program (the NSTL). This document is now included as Appendix E of the Work Plan. Inclusion of Appendix E was done in response to the EPA NODs that were submitted on August 20, 1993.