UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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DALLAS, TX 75202-2733

AUG 11 1994

Ron K
Teri D.

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CERTIFIED LETTER: RETURN RECEIPT REQUESTED

Mr. Joseph C. Vozella, Chief
Environment, Safety and Health Branch
Department of Energy
Los Alamos Field Office
Los Alamos, NM 87544

Re: Notice of Deficiency, RFI Work Plan OU 1136
Los Alamos National Laboratory
NM0890010515

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has reviewed the RCRA Facility Investigation (RFI) Work Plan for Operable Unit 1136 (OU 1136) dated May 23, 1994 and found it to be deficient. Enclosed is a list of deficiencies which need to be addressed within thirty (30) days of receipt of this letter.

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

Sincerely yours,

for David Neleigh
William K. Honker, P.E.,
Chief, RCRA Permits Branch

Enclosure (1)

cc: Mr. Benito Garcia, Bureau Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department

Mr. Jorg Jansen, Program Manager
Environmental Restoration Program
Los Alamos National Laboratory, M992

2531

1 Paper

Notice of Deficiency
Operable Unit 1136

1. **Table ES-1, p vii** - This table indicates that RFI field work is completed 10/31/95 and the final report is submitted 3/19/97. LANL is only proposing to sample three sites, with approximately 13 samples being sent for laboratory analysis. Sampling should take less than one month, 3-4 months for data analysis, 2 months for data validation and 2 months writeup with review time included. The total process should take 8-9 months. Therefore, if sampling is initiated in March 1995 then an RFI report for this work plan should be submitted to EPA by the end of December, 1995. This is an example of the type of time-frame EPA would like to see for these types of sites.

2. **Table ES-1, p. vii** - Why is so much money associated with Activity data sheet management ($46,000)?

3. **1.1 Statutory and Regulatory Background, p. 1-2, last sentence, 2nd paragraph** - The submittal of this and two other work plans in May, 1994 fulfilled the requirements of 100% of the SWMUs listed in Table A of the HSWA Module rather than 55% as indicated in text.

4. **1.3 Description of OU 1136, p. 1-8, 2nd paragraph** - EPA will evaluate information presented in this work plan and inform the lab whether or not a potential release site (PRSs) which has not been added to the HSWA module of the permit, needs to be added or not. EPA will also inform LANL when a PRS may be requested to be removed from the HSWA module via a Class 3 permit modification. These actions may not be a part of the work plan approval process.

5. **4.3.3.1 Conceptual Site Model, p. 4-8** - LANL shall note that EPA considers the top two feet to be surface soil not just the top 6 inches.

6. **5.1.4.2.2 Sampling Summaries, p. 5-12** - It would probably be better for LANL to conduct a leak test on the piping to determine if there were any leaks. If leaks are found then that portion of the line could be excavated and sampled; otherwise sampling may not be required for the line. If LANL has determined that they want to dispose of the line then they will probably want to sample the line to determine disposal options.

7. **6.1.1 Sanitary Line (Post - 1981, PRS 43-001(a2), p. 6-3** - LANL should conduct a leak test on this line, if no leaks are documented then the line may be proposed for NFA. If leaks are found then they should be addressed and sampled. This site may not be deferred, and work should occur in FY95 with other sampling at this Operable Unit. SWMU 43-001(a) is listed as requiring investigation under Module VIII of the RCRA permit. If LANL revises a SWMU number by dividing it (e.g. 43-001(a1-a2)) then a modification of the permit should be requested.

8. 6.1.2 Incinerator PRS 43-002 -

a. Were hazardous constituents or waste ever burned in this incinerator? It is not clear from the description of the unit that this should be considered a SWMU.

b. LANL needs to provide the results from the ash testing. Was analysis for metals conducted for the ash?

c. What actual sampling would LANL conduct for this unit? EPA cannot evaluate deferral without knowing what actions are being deferred.

9. No Further Actions: The following units do not need to be added to Module VIII of the RCRA permit:

43-001(b1) outfall
43-003 waste container storage areas
43-004 carcass storage area
43-005 radioactive liquid waste storage