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

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SEP 09 1994

TA-43

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

ENTERED

OCT 1994
RECEIVED
HAZARDOUS WASTE
PROGRAM

RE: Response to Notice of Deficiency (NOD) for OU 1136 RCRA Facility Investigation (RFI) Work Plan

Dear Mr. Honker:

Enclosed is our response to your NOD comments for the OU 1136 RFI Work Plan which was submitted to your office for review on May ~~23, 1994~~. The comments were received at the Los Alamos Area Office on August 12, 1994. Providing a response to your office within 30 days of the receipt of the NOD requires that we deliver our response to you by September 9, 1994.

Should you have any questions or concerns, please call me at (505) 665-7203, or Bonnie Koch, Scientech, at (505) 665-7202.

Sincerely,

Theodore J. Taylor
Program Manager
Environmental Restoration
Program

LAAMEP:2TT-016

Enclosure

cc:
See page 2

NOTE:
OU 1136 RFI Work Plan has been approved by EPA by letter on or about Sept. 23, 1994.

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NEW MEXICO
ENVIRONMENT DEPARTMENT

1994 SEP 13 PM 3:28

OFFICE OF THE SECRETARY

cc w/enclosure:
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D. Garvey, ESH-8, LANL, MS-K490
J. Aldrich, EES-1, LANL, MS-D462
D. Bradbury, EM/ER, LANL, MS-M992

## CERTIFICATION

I certify under penalty of law that these documents 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:

Response to NOD for RFI Work Plan for OU 1136

Name: _____ Date: 9/7/94

Dennis Erickson
Division Director
Los Alamos National Laboratory

Name: _____ Date: 9/9/94

Joseph Vozella, Chief
Environment, Safety, and Health Branch
DOE-Los Alamos Area Office

**Notice of Deficiency**
**Operable Unit 1136**

1. **Table ES-1, p. vii** – This table indicates that Resource Conservation and Recovery Act (RCRA) facility investigation (RFI) field work is completed 10/31/95 and the final report is submitted 3/19/97. The Laboratory 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 write-up 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 the Environmental Protection Agency (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.

   Response:

   Because this operable unit is not classified as a high priority site, field work will be proposed to be rescheduled to begin in July, 1997; the RFI report will be submitted to EPA in April, 1998.

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

   Response:

   The ADS management budget derives from a DOE-approved baseline assumption allowing up to 10% of total estimated costs of baseline activities for this purpose. Estimate to completion is 570K; the 46K figure is 8% of that total.

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 solid waste management units (SWMUs) listed in Table A of the HSWA module rather than 55% as indicated in text.

   Response: (Replace last sentence, 2nd paragraph, p. 1-2 with...)

   This plan, together with other work plans submitted to EPA meets the scheduled requirements of the HSWA Module to address a cumulative total of 100% of the SWMUs in Table A and cumulative total of 100% of the priority SWMUs listed in Table B.

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, which has not been added to the HSWA module of the permit, needs to be added or not. EPA will also inform the Laboratory when a potential release site (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.

Response: (Replace last sentence, 2nd paragraph, p. 1-8 with...)

EPA will inform the Laboratory regarding its decision whether or not the PRSs recommended for NFA can be requested to be removed from the HSWA Module via a Class 3 permit modification.

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

Response:

The Laboratory recognizes that EPA considers the top two feet of soil profiles to be surface soil.

6. **5.1.4.2.2 Sampling Summaries, p. 5-12** – It would probably be better for the Laboratory 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 Laboratory has determined that they want to dispose of the line, then they will probably want to sample the line to determine disposal options.

Response:

Leak tests will be performed only on active lines. Abandoned lines will be excavated and removed. Samples will be taken at all locations where there is evidence of leakage. If there is no such evidence, then samples will be taken at each joint in the line.

7. **6.1.1 Sanitary Line (Post - 1981, PRS 43-001(a2), p. 6-3** – The Laboratory should conduct a leak test on this line, if no leaks are documented then the line may be proposed for No Further Action. 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 the Laboratory revises a SWMU number by dividing it [e.g., 43-001 (a1-a2)] then a modification of the permit should be requested.

Response:

The SWMU number 43-001 (a) was divided into parts for investigatory purposes. As it stands in the permit, one number covers an active waste line, an abandoned waste line, and an outfall. The SWMU will not be subdivided officially on the HSWA modification permit.

To the best of LANL's knowledge, hazardous chemicals have not been disposed of through the sanitary waste system currently serving TA-43 for over twenty years; nor does it present a current human health or environmental risk on or off site.

Although a leak test could be performed on this line, the locations of any leaks would be difficult and impractical to determine because of its location beneath structures and parking lots. Given the fact that there is no reason to believe that contaminants have been put into the line and the significant problems associated with a leak test, it is recommended that sampling of the line be deferred until the line is placed into an inactive status.

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.

Response:

To the best of LANL's knowledge no hazardous constituents were ever burned in this incinerator. Experiments done while the incinerator was in use involved total radioactivity; no chemicals were used. The incinerator was identified as a SWMU because it burned solid waste. Because hazardous waste or constituents were never managed at the unit and the unit has no history or evidence of release, the unit is recommended for NFA rather than DA. LANL proposes removal from the HSWA Module via Class 3 permit modification request.

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

Response:

Results of the ash analysis indicated cesium-137 concentrations of 6+/- 3 nCi total radioactivity (please see attached). Analysis for metals was not conducted because the source of ash residue involved research carcasses injected only with radioactive tracers.

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

Response:

LANL recommends no further testing or sampling be done now or at time of decommissioning because neither the stack or the ash pit presents a current human health or environmental risk on or off site.

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 |

Response:

The units listed above will not be added to Module VIII of the permit and will not be investigated any further.