



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

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*Teri D.*  
*what is 0411403*  
*Barbara*  
*for the*  
*file LANC*

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

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has reviewed and approves the RCRA Facility Investigation (RFI) workplan for Operable Unit 1140 with the enclosed modifications. The approved workplan shall consist of the RFI workplan submitted on August 19, 1993, the Notice of Deficiency response received August 25, 1994, and the enclosed modifications.

EPA has accelerated several of the RFI report schedules from those proposed by Los Alamos National Laboratory (LANL) staff. All revised schedules are comparable to timeframes which other facilities are expected to meet. LANL shall immediately implement this workplan according to the proposed schedule.

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

Sincerely yours,

*Allyn M. Davis*

Allyn M. Davis, Director  
Hazardous Waste Management Division

Enclosure

cc: Ms. Kathleen Sisneros  
Director, Water and Waste Management Division  
New Mexico Environment Department  
Mr. Jorg Jansen  
Program Manager, Environmental Restoration Program  
Los Alamos National Laboratory, M992



TC

**Modifications  
Operable Unit 1140**

1. RFI report dates for each SWMU in this Operable Unit (OU) are listed below:

<u>Report Due</u>	<u>SWMUs</u>
10-1-96	*46-002
5-1-96	46-003(a,b,c,e,f,g,h); 46-004(t); 46-005; 46-006(c); *46-009(a,b); 46-010(d)
6-1-97	46-003(d); 46-004(c,d,e,p)
9-1-95	46-004(a2,b,b2,c2,d2,f,g,h,m,q,r,s,u,v,w,x,y,z); 46-006(a,b,d,f,g); 46-007; 46-008(a,b,d,e,f,g)

\* High priority sites

2. LANL shall define if a release has occurred or the extent of contamination by comparing phase I analytical results with background for inorganics and Practical Quantitation Limit (PQL) for organics.
3. LANL may not average values following a voluntary corrective action (VCA) to show that contamination is within acceptable limits (refers to NOD Response 9(a)).
4. EPA indicated in deficiency number 13 that all units listed in this section need to be undergo a full suite analysis. A review of Table 5-1-7 indicates that for some of the SWMUs (e.g. 46-003(b) this required analysis is not occurring. LANL shall analyze all samples from this group of SWMUs for volatiles, semivolatiles, and metals.
5. Several of the Tables submitted in the NOD Response have not been revised for the changes requested by EPA in the NOD. Per conversation with your staff, revised tables should be submitted to EPA within 30 days of receipt of this letter.
6. In the response to questions # 27 and 30, LANL indicates that EPA randomization techniques will be used. LANL shall provide a description of the actual randomization techniques which is being used. This information should be provided within 30 days of receipt of this letter.
7. In reference to LANL's NOD response # 31(e), a sample should be collected at the outfall at 6 inches and at 18-24 inches. This may require sampling in the tuff. Analysis should be for VOAs, SVOCs and metals.
8. In LANL's NOD response to deficiency #36, LANL shall compare analytical results from sampling to background (inorganics) or PQLs (organics).

**Fact Sheet**  
**Los Alamos National Laboratory**  
**RFI Workplan Approval**  
**Operable Unit 1140**

- \* Operable Unit 1140 (OU 1140) has primarily been used for photochemical, laser and hydrogen fuel-cell research.
- \* Fifty-one solid waste management units (SWMUs) are listed in the HSWA Module of the RCRA permit. These units include septic systems, drywells, sewage lagoons, surface disposal/release sites, outfalls, landfills, exhaust stack emissions, and active and inactive waste storage areas.
- \* The majority of septic tanks have been drained and backfilled with dirt, so LANL will be coring through the tanks and taking a sample within the tank and beneath the tanks. Distribution boxes have not been backfilled and their sludge will be sampled. Drain fields will have two to four coreholes drilled to 15 feet and a sample will be collected every 5 feet.
- \* The sewage lagoon is a high priority site, and it will be extensively sampled. Surface samples will be collected in the lagoon; an angled borehole will be drilled under the lagoon; and the lagoon lining will be removed and samples will be collected under the lining. LANL anticipates removing this structure.
- \* Storage areas, surface spills and outfalls will all have surface samples collected and some augered sampling.
- \* Sampling for the landfill which extends from the mesa to the bottom of the canyon will consist of drilling six boreholes from the top of the landfill to the fill-bedrock interface, and four sample holes in the landfill near the canyon bottom.
- \* Comments from NMED were incorporated into the Notice of Deficiency.
- \* This RFI workplan has not been peer reviewed; however, five other RFI workplans for this facility have been peer reviewed.
- \* **Environmental Justice and Demographic Information**  
16.5% Minority (For NM the percent minority is 49%)  
13% Economically Stressed (For NM the percent economically stressed is 31%)