



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

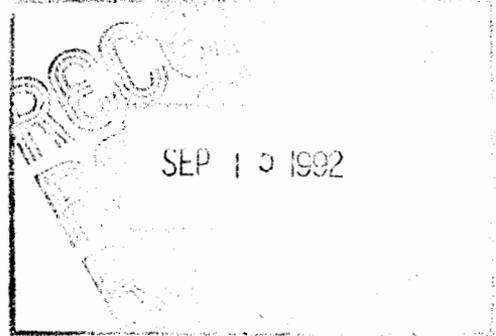
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

RY - Honker File
led (AVC) 72

Barbara
Bruse

September 9, 1992

OU 1147



Jerry L. Bellows
Area Manager
Department of Energy
Los Alamos Area Office
Los Alamos, New Mexico 87544

Re: RFI Work Plan for OU 1147
Los Alamos National Laboratory
NM0890010515

Dear Mr. Bellows:

The Environmental Protection Agency (EPA) has completed a review of the RCRA Facility Investigation (RFI) Work Plan for the Operable Unit 1147 (OU 1147), and has found the work plan to be deficient. You have thirty (30) days from receipt of this letter to address the enclosed list of deficiencies.

Should you have any questions or require additional information, please contact Barbara Driscoll at (214) 655-6785.

Sincerely,

William K. Honker, P.E.
Chief
RCRA Permits Branch

Enclosure

cc: Benito Garcia, NMED

XL



8674

List of Deficiencies

Overall Comments

1. According to the Executive Summary (page vii) and Table ES-2, the RFI field work is scheduled to be completed December 1995, and the RFI Report is not going to be completed until November 1997. The HSWA permit requires an RFI Report within sixty (60) calendar days after completion of the RFI. The scheduling indicated is too long a time frame for writing the RFI report. The RFI report should be completed within 6-8 months of field work completion.

2. LANL shall provide figures in the work plan which show the location of soil borings and sampling points for each aggregate unit. Currently, Figure 5-3 is referenced for several aggregate figures. LANL shall show each aggregate unit separately, with Solid Waste Management Units (SWMUs) for that unit labelled and sampling points indicated.

3. The primary focus of the work plan for the HSWA portion of the permit should be sampling to determine extent of contamination for the potential hazardous constituents present; therefore, only submitting one-third of the samples taken for laboratory analysis is not adequate to make a determination as to extent of contamination (especially for Landfill C). Other samples are only going to be field analyzed. Field analysis should only be used for screening to determine sampling points.

4. The screening level chosen for TA-50 is 10 pCi/g which is within the detection limits of the radiological survey instrumentation to be used. By comparison the screening level for OU 1078 is 20 pCi/g, and this is also indicated to be the detection limits of the radiological instruments used for that investigation. Is there a difference in the instruments being used for these RFIs? Why have two different screening levels been chosen?

5. To definitely determine the extent of contamination, all samples should be initially analyzed for all the constituents on Appendix VII. If subsequent sampling is required, then future analysis can be reduced based upon comparison of the historical knowledge of waste handled versus the constituents detected in the Appendix VIII analysis.

6. As part of the ongoing RCRA Facility Assessment (RFA) conducted by LANL the following SWMUs do not appear to require a RCRA Facility Investigation (RFI); therefore, the HSWA permit does not need to be modified to include these units:

50-005	50-003(c)
50-006(b)	50-003(c)
50-006(e)	50-001(a)
50-003(e)	50-001(b)
50-003(b)	

Specific Comments

2.2.1.4.1.1 On page 2-12, in paragraph two the last sentence refers to the permit being in effect since February 1991, which permit is this? Also, please provide a definition for the term "water glass".

2.2.2 SWMU 50-006(c) - This SWMU was created by stack emissions; therefore, is the reference to discharges being regulated under an NPDES permit accurate?

4.2.1.1 Site History - Text indicates that some vapor-phase transport of volatile wastes took place at Area C, LANL shall indicate specific chemicals which were found.

5.1.2.1.2 50-002(d) Text indicates that hole HDH-1 will pass within 30 feet of the bottom of this tank. It is not clear exactly where this borehole will be in relation to the tank. LANL has made a recommendation that SWMU specific sampling should not take place at this tank; however, it has not been placed on the list of SWMUs for which no further action has been requested. Please, provide a clearer explanation of the sampling for this tank, or provide documentation that no leaks have occurred.

5.1.2.2 Neither figure 5-4, nor figure 2-13 indicate the location of SWMUs 50-011(b) or 50-001(b), please provide a figure with the SWMUs labelled.

5.1.2.2.2 50-011(b) Active Sanitary Sewer Line This SWMU was listed to be investigated under the HSWA permit, what portions of the SWMU will radial borehole RDH-3 sample? An adequate sampling plan should be presented for this SWMU.

5.2 The Area C Landfill - Under the Phase I investigation, about 223 surface soil samples will be collected at a depth of 6 inches. Text on page 2-57 indicates that in 1984, a new soil cover of .5 to 3 feet of topsoil was placed over about 1.5 feet of crushed tuff all of which was placed over most of Area C (except for the northeast corner). It appears that these surface soil samples will primarily be sampling the cover over the landfill. These samples will not be adequate for the HSWA characterization of the landfill. An additional soil boring should be added west of Pit No. 5. What is the criteria for determining which third of the samples collected from the core samples will receive a full suite analysis at Landfill C? LANL shall provide a detailed sampling plan for Landfill C.

Table 5-12 Why does this table indicate that there will be a field blank for volatiles during Phase I Surface Investigations at Area C Landfill when volatiles will not be analyzed for during this phase?