

Los Alamos

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

TA50

(1)

DATE
IN REPLY REFER TO
MAIL STOP
TELEPHONE

October 14, 1992
ADO-92-1039
A120
(505) 667-9390

Mr. Jerry L. Bellows
Area Manager
Department of Energy
MS A316
Los Alamos Area Office
Los Alamos, NM 87544-5000

RE: NOTICE OF DEFICIENCY (NOD) FOR OPERABLE UNIT (OU) 1147 PLAN

Dear Mr. Bellows:

We have reviewed the Notice of Deficiency on the RCRA Facility Investigation (RFI) Work Plan for Operable Unit 1147. A response to these comments is enclosed. Mr. Steve Slaten of your office has reviewed the response and agrees with our assessment. The Environmental Protection Agency (EPA) has requested this response no later than October 14, 1992. We have also enclosed a draft letter for you to respond to EPA.

Sincerely,

LA Gentry for
Allen J. Tiedman
Associate Director for Operations

AJT:vvm

Enclosure: Draft letter to Mr. William Honker

An Equal Opportunity Employer/Operated by University of California

Received by ER-RPF

OCT 15 1992

YCG



8675

Cy: J. Shipley, EE-AET, MS F641
T. Gunderson, EM-DO, MS K491
C. Nylander, EM-DO, MS K491
B. Vocke, EM-13, MS M992
L. Sohlt, EM-13, MS M992
P. Aamodt, EM-13, MS M992
K. Bitner, ERPO, MS A906
C. Rofer, EES-1, MS D462
T. Glatzmaier, EES-5/EM-13, MS M992
EM-13 File, Symbol #92-1077
GRM, MS A150

~~REF MS 1077~~

UNCLASSIFIED

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 Titles:

Response to Notice of Deficiency for Operable Unit 1147

Name: James F. Jackson Date: 10/14/92
Associate Director for Operations
Los Alamos National Laboratory

Name: _____ Date: _____
Environment, Safety, and
Health Branch
Los Alamos Area Office - DOE

Mr. William Honker
Chief, RCRA Permits Branch
US Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas TX 75202-2733

Dear Mr. Honker:

The Department of Energy (DOE) has reviewed the Notice of Deficiency on the Resource Conservation and Recovery Act Facility Investigation (RFI) Work Plan for Operable Unit (OU) 1147. Enclosed is our response to the comments.

If you have any questions on the response, please contact Mr. Steve Slaten at (505) 665-5050.

Sincerely,

Jerry L. Bellows, Area Manager
Los Alamos Area Office

JB:wm

Enclosure: Response comments to RFI Work Plan for OU 1147

from expectations, additional analyses will be performed to establish the full range of contaminants present.

6. In the Notice of Deficiency, the list of SWMUs that do not appear to require an RFI includes 50-003(c) twice, and excludes 50-003(d), which was recommended for no further action in the Work Plan. We believe that this may be a typographical error.

Specific Comments

2.2.1.4.1.1 The permit referred to in paragraph two on page 2-12 is the RCRA Part A Permit Application, which was submitted to the NMED on January 25, 1991. Therefore these are considered RCRA Interim Status Units. Water glass is defined as "a syrupy solution containing 50 per cent of sodium silicate, Na_4SiO_4 , and Na_3SiO_3 " by Gardner's Chemical Synonyms and Trade Names, Ninth Edition, Gower Technical Press, Brookfield, Vermont, 1987. At TA-50, it is a component in the solidification of sludge produced by the Radioactive Liquid Waste Treatment Plant.

2.2.2 SWMU 50-006(c). The discharges are regulated under NESHAPS, not NPDES.

4.2.1.1 Site History. Tritiated water is the volatile chemical that was found.

5.1.2.1.2 50-002(d). Borehole HDH-1 passes parallel to the long axis of this tank about 30 feet south of the tank. We are not recommending SWMU 50-002(d) for no further action at this time, although we do not believe, on the basis of an extensive records search, that spills have occurred at this tank. The fact that several SWMUs, including 50-002(d), are located within or adjacent to the Radioactive Waste Treatment Plant allows them to be included in the sampling plan for Aggregate 1. The sampling plan for Aggregate 1 is designed to detect large contaminant plumes beneath the structures of Aggregate 1. The purpose of borehole HDH-1 is to sample under the treatment wing of Building 1, which includes 50-002(d).

5.1.2.2 SWMUs 50-011(b) or 50-001(b) are indicated on the enclosed figure for PRS Aggregate 2.

5.1.2.2.2 50-011(b) Active Sanitary Sewer Line. Radial borehole RDH-3 will not sample portions of this line. This statement on page 5-16 of the Work Plan is erroneous. The line was emplaced in 1983. It serves Building TA-50-1 and is connected only to sanitary waste facilities. We have found no records of releases from this line. Because of the history of this line, we propose that no further action be taken on it.

5.2 The Area C Landfill. The crushed tuff and topsoil cover was placed over Area C because the old surface was contaminated with americium and plutonium. Several transport mechanisms could bring material to the surface, including diffusion of volatiles, solubilization of metals, and erosion of the cover. Soil sampling is part of the ongoing Laboratory surveillance of inactive landfills, and the sampling described in the Work Plan will be done in conjunction with the surveillance program. Surface contamination data are also needed for risk analysis. The soil sampling is not intended to be a complete sampling plan. Borings are also planned around and under Area C during Phase I and are described in the Work Plan. Nine coreholes to depths of 20 and 40 feet were drilled for sampling during May 1991. Results from this sampling will be incorporated into Phase Reports. One of these holes is in approximately the position requested in the Notice of Deficiency. We feel that this Phase I sampling will show whether contaminants are moving out of Area C. Lateral, downward, and upward migration will be tested.

Table 5-12. No field blank will be taken for volatiles during Phase I Surface Investigations at Area C Landfill. The specification of a field blank is an error.

40-50000-1-100



ER Record I.D.# 0010026

LOS ALAMOS

LOS ALAMOS NATIONAL LABORATORY

ENVIRONMENTAL RESTORATION
Records Processing Facility
ER Record Index Form
(Side 1 of 2)

DATE RECEIVED: 10/15/92 PROCESSOR: CSH

Part I: Complete all fields; indicate if not applicable or appropriate; please write legibly.

DOCUMENT TO: Jerry L. Bellows DOCUMENT DATE: 10/14/92
ORIGINATOR NAME: Allen J. Tiedman ORGANIZATION: ADO
SYMBOL: ADO-92-1039 PAGE COUNT: 7
SUBJECT/TITLE: Notice of Deficiency (NOD) for Operable Unit
(OU) 1147 Plan

RECORD TYPE (Circle relevant type for primary record; type of attachments should be selected on *Keywords List*):

- | | | | | |
|-------------------------|---------------|----------------|------------------------|------------------|
| Analytical Data | FAX | Map | Plan | Study |
| Chain-of-Custody | Figure | Memo | Procedure | Telephone Record |
| Computer Output | Form | Microform | Purchase Request | Transcription |
| Contract | Interview | Notebook | Receipt Acknowledgment | Video |
| Controlled Distribution | <u>Letter</u> | Personal Notes | Report | Work Plan |
| Drawing | Logbook | Photo | Review | Other _____ |

RECORD CATEGORY: P RECORD PACKAGE #: _____
(P for Programmatic or R for Reference)

RECORD FILMED (Y/N): Y RECORD LOCATION: _____
(Indicate location of record if not filmed.)

Part II: Complete all fields; indicate if not applicable or appropriate; please write legibly. Use *ER Record Index Form Attachment Sheet* if needed.

ATTACHMENTS FILMED (Y/N): Y LOCATION: _____
(Were attachments to this record filmed?) (Indicate location of attachments.)

TECH AREA(S) <small>LIST RELEVANT TECH AREAS</small>	ADS NO(S) <small>LIST RELEVANT ADS NO(S)</small>	WBS NO(S) <small>LIST RELEVANT WBS NO(S)</small>	STRUCTURE NO(S)/MDA <small>LIST RELEVANT STRUCTURE NO(S)/MDA</small>
<u>50</u>	<u>1147</u>		<u>50-1</u>

ENVIRONMENTAL RESTORATION RECORDS PROCESSING FACILITY