



Department of Energy

Field Office, Albuquerque
Los Alamos Area Office
Los Alamos, New Mexico 87544

RCRA PERMITS BRANCH

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TA-50

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William K. Honker, Chief
Resource Conservation and Recovery Act (RCRA)
Permits Branch
U. S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Dear Mr. Honker:

The Department of Energy has reviewed the Notice of Deficiency on the RCRA 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 of the Environment, Safety and Health Branch at (505) 665-5050.

Sincerely,


Jerry L. Bellows
Area Manager

LESH:6SS-049

Enclosure:
Response comments to RFI
Work Plan for OU 1147



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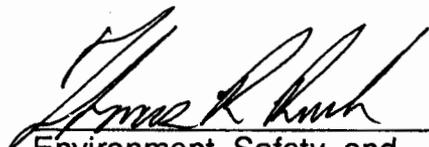
CERTIFICATION

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:  Date: 10/14/92
Associate Director for Operations
Los Alamos National Laboratory

Name:  Date: 10/15/92
Environment, Safety, and
Health Branch
Los Alamos Area Office - DOE

We have reviewed the Notice of Deficiency on the RCRA Facility Investigation (RFI) Work Plan for the Operable Unit 1147. Our responses to the comments in EPA's List of Deficiencies, as discussed with Barbara Driscoll on September 21, 1992, follow:

Overall Comments

1. The RFI has been defined as being completed when DOE accepts the draft of the RFI Report for transmittal to EPA and New Mexico Environmental Department. This milestone, the completion of RFI, is not indicated on Table ES-2.
2. The RFI is expected to be completed on 12 June 1997, which is within 60 days of the submission of the EPA draft of the RFI Report on 11 July 1997.

2. Figures are enclosed that show the locations of SWMUs, soil borings, and sampling points for each aggregate unit.

3. We plan to use three types of chemical analysis for samples: (1) field screening, (2) field laboratory analysis, and (3) a standard analytical laboratory. Field screening includes radiological surveys and chemical tests that can be performed in the field. The "field laboratory" referred to in the Work Plan (in, for example, Figure 5-1) is a mobile chemical analysis laboratory that will be located within TA-50 during sampling. This laboratory will have quality assurance levels equal to those of a standard analytical laboratory. Two-thirds of the samples will be analyzed in this laboratory, and one-third will be sent to a standard analytical laboratory. The results from the standard analytical laboratory will validate the field laboratory results.

4. We thank you for this comment. The Los Alamos Environmental Restoration Program is considering this issue and plans to arrive at appropriate standards for all Operable Units.

5. In some cases in the Work Plan, we believe that we have enough historical data to eliminate many of the compounds in Appendix VIII as contaminants. In other cases (for example, Area C), the planned analyses for VOA (SW 8240), semivolatiles (SW 8270), metals (SW 6010), and PCB (SW 8080) will cover compounds listed in Appendix VIII that we believe are likely to be in Area C, based on historical records. If positive results are obtained that differ significantly

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.