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11/30/92

Cheryl:

As I discussed with Steve Slaton these are the responses on which I would like further clarification. I'm sorry it has taken me so long to get back to this. If you are unclear on what I am asking for, please contact me at (214) 655-6770. Leave a message and a time when I can best get hold of you.

Thanks,

Barbara Driscoll

Overall Comments:

1. The response to my question does not indicate that the date on field work is anticipated to be completed has changed. If field work is scheduled to be completed December of 1995 then the final RFI report should be received by EPA within a year. I am assuming that there will be RFI phase reports submitted between sampling phases. It is unacceptable to EPA for the final report to take 18 months for submittal. The report should be submitted within a 6-8 months of completion of field work. I will not approve the workplan with the dates as indicated.

5.1.2.1.2 SWMU 50-002(d) The MOD response indicates that this SWMU is not being sampled, as the diagram for HDH-1 shows this borehole will not be directly under or very close to the tank in question. The area underneath the tank should be sampled or LANL should provide documentation that spills are not a concern and request NFA for this unit.

5.2 The Area C Landfill - The question in the MOD requesting the criteria for determining which third of the samples collected from the core samples will receive a full suite analysis at Landfill C was not answered. Specifically for the four shallow-angle boreholes, samples should be collected under the approximate location of each trench and/or pit and analyzed for a full suite. Anytime that field screening indicates possible contamination at the selected five foot interval that sample should be analyzed for the full suite. It may be necessary to analyze more than one-third of the samples to satisfactorily determine the potential extent of contamination. I still need to know what the criteria will be for determining which samples will have a full suite analysis.

In the MOD, I requested an additional bore hole be added west of Pit No. 5. LANL's response indicated that nine additional coreholes had been drilled for sampling during May 1991. You need to specify what analysis was done on these cores, how samples were collected and what intervals were sampled. I need the specifics of the sampling. I do not need the results of the sampling for this response. This information will help me make a determination as to whether the additional borehole will still be required.



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Overall Comments

1. We plan to submit results and their evaluation in quarterly reports and Phase Reports, so that you will be kept informed in a timely way. After field work is completed, the results of sample analysis are expected to require at least six months, based on the ER Program's current experience. Although evaluation of the results and writing of the RFI Report will begin as early as possible during field work and sample analysis, the RFI Report cannot be completed until all sample analysis results are in hand. After the RFI Report is completed, almost six months are required for the ER Program's required internal and DOE reviews. The RFI has been defined by the ER Program as being completed when DOE accepts the draft of the RFI Report for transmittal to EPA and New Mexico Environmental Division. This milestone, the completion of RFI, is not indicated on Table ES-2 but is expected on 12 June 1997, which is within 60 days of the submission of the EPA draft of the RFI Report on 11 July 1997. We plan to accelerate this schedule where we can, but the ER Program has not wanted to plan in an unrealistic way.

5.1.2.1.2 SWMU 50-002(d). An additional borehole will be placed as shown on the enclosed figure to sample SWMU 50-002(d) as a part of the sampling plan for Aggregate 1. Analyses will be as for HDH-1, plus for nitrates and nitrites. Specifications for this borehole in the format of Table 5-3, Corehole Requirements for SWMU Aggregate 1, are given below.

Corehole Designation	Approximate Location	Dip Angle	Degrees from North	Traverse Length	Actual Length	Vertical Depth	SWMU Aggregate(s)
HDH-5	E. Fence	10°	270°	190 ft	192 ft	[1]	1

Drilling Method	Hole ID	Sampling Method	Sample OD	Percent Sampled	Specific Sample Points Required	Maximum Sampling Depth Criterion
Air Core	4.25 in.	WLCC[2]	2.5 in.	100%	Fractures, features, and every 5 ft	Background level + 5 ft

[1] Angle hole--depth varies with lateral position
 [2] Wire line continuous core

5.2 The Area C Landfill. Samples will be collected every five feet and at fractures and other features (Table 5-14) in the vertical and horizontal cores recovered from all boreholes, including the shallow-angle boreholes. This will provide samples under all trenches and pits. Every third sample along the core will have be analyzed for the full suite indicated in Table 5-15. The results of the full suite analyses will be used to evaluate whether additional samples need to be analyzed for a full suite. Core will be

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retained for the duration of the RFI (page 5-43) and will thus be available for additional analyses.

The nine corchholes drilled around the perimeter of Area C in May 1993 were located as follows: two on the northwestern side, three on the southern side, three on the northern side, and one on the eastern side near the position you have recommended. Coreholes were drilled to depths of 20 and 40 feet. Soil samples were collected every five feet with a hollow stem/split spoon auger fitted with eight-inch stainless steel sleeves. Soil subsamples were screened for gross alpha, beta, and gamma activity in the field and then analyzed for Resource Conservation and Recovery Act (RCRA) target volatile organic compounds. Total uranium and tritium levels were also determined in soil samples collected at the 5-ft and 20-ft depths.