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*File
LANL DU 1154*

October 13, 1994

Ms. Diana Webb, LANL/AIP POC
Los Alamos Area Office, A316
528 35th Street
Los Alamos, NM 87544



RE: Review of LANL's Operable Unit 1154 RFI Workplan, dated
May 1994

Dear Ms. Webb:

Attached is the Agreement in Principle Program's comments on the RFI workplan for Operable Unit 1154 as submitted to and reviewed by the Hazardous and Radioactive Materials Bureau's Permitting and Technical Compliance Programs. Please indicate your receipt of this document in writing within thirty (30) days.

If you have any questions regarding this matter please contact Ms. Mary Perkins at (505) 672-0458.

Sincerely,

Benito J. Garcia, Chief
Hazardous and Radioactive Materials Bureau

cc w/ attachment:

- Ron Kern, Technical Compliance Program Manager
- Barbara Hoditschek, Permits Program Manager
- Neil Weber, DOE Oversight Bureau Chief
- William Stone, NMED AIP Point-of-Contact, SNL
- LANL Red 1994 File
- AIP/LANL Program File



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M E M O R A N D U M

TO: Barbara Hoditschek, Program Manager, NMED/RCRA Permits
Ron Kern, Program Manager, NMED/RCRA Technical Program

THROUGH: ^{1/02} Bruce Swanton, Program Manager DOE/EM Oversight
^{8/9} Stephen Yanicak, Supervisor AIP/LANL

FROM: ^M Mary Perkins, NMED AIP/LANL

DATE: October 6, 1994

SUBJECT: Review of LANL's Operable Unit 1154 RFI Work Plan,
submitted May 1994.

The Hazardous and Radioactive Materials Bureau (HRMB) Agreement in Principle (AIP) staff have completed the review of the operable unit (OU) 1154 RCRA facility investigation work plan (RFIW). This memo details the comments stemming from the review. For clarity, the memo contains numbered items listing comments that are keyed to a specific chapter/section number, bullet, table or figure in the RFIW as well as to the page number e.g., Item 2. (4.4.4.4, b.5, T. 4-4-4, Fig. 4-4-4, pg. 4-17). The AIP program is submitting these comments and technical recommendations to the HRMB's RCRA Permits and Technical Compliance Programs due to eventual New Mexico Hazardous and Solid Waste Act (HSWA) authorization.

Item

1. **General Comment** There are no specific dates or schedules for Phase I sampling or geophysical surveys in the RFI. A definitive schedule should be provided.
2. **General Comment** Voluntary corrective actions (VCA) performed at any area of concern (AOC), or solid waste management unit (SWMU) are done at Los Alamos National Laboratory's (LANL's) own risk. Under HSWA authority, the EPA or the state of New Mexico could revisit all potential release sites (PRS) for evaluation at any time in the future. Review of proposed VCAs by NMED/AIP staff may help in the designing and completing of adequate verification sampling and may help in communicating the objective and results of the VCA to the regulatory bodies, thereby reducing the possibility of revisiting the site in the future.
3. **Specific Comment (4.1.3 pg. 4-8) Decision Point 3** If LANL finds the existing analytical data to be inadequate for comparisons to background, screening action levels, or for

use in risk calculations, it is recommended this data not be used to support no further action (NFA) decisions.

4. **Specific Comment (4.1.3.1 pg. 4-9 and T. 4-4 pg. 4-20)**
The subset of contaminants of concern (COC) such as the selected indicator constituents listed in Table 4-4 is not adequate for phase I sampling. It is recommended LANL use EPA approved methods listed under the most current SW 846 for VOCs, SVOCs, and metals. This comment applies to all analyte lists in Chapter 4 and Chapter 5 of the workplan.
5. **Specific Comment (4.4.1 pg. 4-23) Potential Transport Process** "Substances with the potential to volatilize will transfer from the soil surface directly to the air." Substances that volatilize will move from areas of more concentration to areas of less concentration in all directions, and not only to the air. This is particularly true of dense compounds that easily volatilize, such as chlorinated solvents and their break-down products. These physical properties should be taken into consideration.
6. **Specific Comment (5.2.3 pg. 5-18)** Since both locations, GTP-3E and GTP-3W, were used for collecting drilling and circulation fluids from well GT-2, it is recommended they both be investigated during phase I of the RFI process.
7. **Specific Comment (5.3.1 pg. 5-28)** "The sludge was analyzed by Fenton Hill personnel prior to disposal in the sludge pit. Although each individual analysis indicated the sludge met any restrictions imposed according to the agreement between the DOE and the U.S. Forest Service. It is not known what standards or quality assurance requirements were followed."
What were the restriction imposed by the cited agreement?
8. **Specific Comment (5.3.5.1 pg. 5-29)** "Although excess water transported with the sludge is reported to have periodically flowed through the berm and ponded on the bedrock surface south of the pit, samples will not be taken in that area because any chemical constituents in the water would also be present as residuals in the sludges in the pit." It is recommended the area of bedrock south of the pit that received the excess water which was transported with the sludge be sampled during Phase I of the RFI process. LANL can not definitively state that this area is clean without sampling.

9. **Specific Comment (5.4.1 pg. 5-35)** A formal VCA with clear lines of responsibility should be prepared for removal of the drum and assessment of its surroundings. The plan should be provided to NMED for review.

SWMU's/AOC's Proposed For No Further Action (NFA)

10. **General Comment** It is standard practice for the AIP staff to evaluate NFA sites of greatest concern and then to provide technical comments to the EPA through the NMED RCRA Permits/Technical Compliance staff. A list of NFA sites to be visited will be submitted to the OU 1100 OUPL and NMED RCRA Permits/Technical Compliance staff following a comprehensive review of Chapter 6.
11. **General Comment** When proposing a PRS for NFA to EPA based on archival data, the archival information and an assessment of its reliability should be provided for review. Archival data could possibly be submitted as an addendum to the RFI work plan (e.g., The OU 1154 addendum containing 7 sites proposed for NFA).