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Mr. Joseph C. Vozella  
Assistant Area Manager  
Environment, Safety and Health Branch  
Department of Energy  
Los Alamos Field Office  
Los Alamos, NM 87544

Re: RFI Work Plan for Operable Unit 1154  
Fenton Hill Site NMD986676807

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has reviewed the RCRA Facility Investigation work plan for Operable Unit 1154. The work plan is approved with the enclosed modifications. Please supply any requested information within 45 days.

If you should have any questions, please feel free to contact Barbara Driscoll at (214) 665-7441.

Sincerely,

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

Enclosure

cc: Mr. Benito Garcia  
Bureau Chief, Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
Mr. Jorg Jansen  
Program Manager, Environmental Restoration Program  
Los Alamos National Laboratory, M992

*Driscoll*  
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*K. J. Owen*  
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*W. Honker*  
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**Modifications  
Fenton Hill Site  
Operable Unit 1154**

1. Los Alamos National Laboratory (LANL) should provide a definitive schedule for each of these sites which will be investigated including field start work and completion dates and submittal of report dates.
2. **No Further Action Criteria, p. 4-5** - Text in this section of the workplan indicates that all the No Further Action (NFA) criteria are based on the HSWA permit while only criteria number two is actually discussed in Section J of the HSWA permit. LANL may wish to use the same NFA criteria that has been agreed to by EPA for Los Alamos for these Fenton Hill sites.
3. **4.1.3 Decision Point 3, p. 4-8** - If pre-existing analytical data is of an unverifiable quality then it should probably not be used to support a NFA determination.
4. **4.1.3.1 Phase I Sampling, p. 4-9** - Rather than sampling for only indicator constituents, LANL should complete analysis for VOCs, SVOCs, and metals using SW 846 or other EPA approved methods. Upon receipt of laboratory results, LANL may determine that data validation only needs to occur for certain constituents.
5. **4.1.4 Decision Point 4, p. 4-10** - LANL should collect background samples from uncontaminated areas in the area of Operable Unit 1154, for comparison to Phase I sampling results.
6. **4.4.1 Potential Transport Processes, p. 4-23** - The second sentence in the second paragraph of this section states, "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 break-down products. These physical properties should be taken into consideration.
7. **5.2.5.1 Sampling Strategy and Objectives, p. 5-20** - LANL indicates that sampling of the active lined ponds will be deferred until D&D; because there is no evidence of an environmental release. What means has LANL used to determine that no release has occurred from these units?
8. **5.2.5.3 Sampling Plan, p. 5-22** -
  - a. In addition to taking a sample for analysis from the most highly contaminated horizons, LANL should also take a sample from the bottom of the ten foot interval below the pond bottom.

Should this interval be determined by field screening to be the most contaminated, then LANL shall collect an additional sample ten feet deeper, and every ten feet until contamination is not recorded by field screening devices.

b. LANL should also sample pond GTP-3E in a similar manner. A decision for NFA cannot be made for this site based on the sampling conducted at GTP-3W.

c. In addition to the two sample locations proposed for the Burn Swale, LANL should also sample near the outfall. LANL needs to determine the depth of contamination closer to the outfall. Therefore, LANL should core to a depth of ten feet and collect a sample for analysis at the bottom foot near the outfall. Should field screening indicate contamination then LANL should continue to field screen every five feet until there are no readings of contamination. A sample should be collected for analysis at the point where contamination is no longer indicated by field screening, and at the last interval where contamination was indicated.

9. **5.3.1 Description and History of Group 3 Site, p. 5-28** - What type of analysis was conducted on the sludge? What were the restriction imposed on the sludge according to the agreement between the DOE and the U.S. Forest Service?

10. **5.3.5.1 Sampling Strategy and Objectives, p. 5-29** - LANL should also sample the area where sludge flowed through the berm and ponded on the bedrock surface south of the pit. A sample should be collected in the top two feet from within this area, and submitted for laboratory analysis.

11. **5.3.5.3 Sampling Plan, p. 5-31** - LANL should also submit the last sample taken from the bedrock at the bottom of the hole for laboratory analysis.

12. **Table 5-12, p. 5-33** - It appears that LANL is collecting quality assurance samples based on the number of samples field screened rather than the number of samples to be submitted for laboratory analysis. This procedure should be reviewed.

13. LANL needs to provide an explanation as to why samples from Groups two and three are not being analyzed for VOCs.

14. **5.4.5.3 Sampling Plan, p. 5-40** - The sampling plan does not detail the depth of the leach field or the depth of sample collection. Table 5-16 indicates that five soil samples will be field screened with an XRF; however, this is not mentioned in text. How will the location of the field screened samples be selected?

15. LANL should provide a copy of the workplan for removal of