



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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Benton

AUG 09 1996

Mr. Benito Garcia, Chief
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
2044A Galisteo St.
Santa Fe, NM 87505

RE: **Technical Review of Sandia National Laboratories (SNL/NM)
RFI Work Plan for OU 1335, Southwest Test Area,
EPA I.D. No. NM05890110518**

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a technical review of Sandia National Laboratories (SNL) RFI Work Plan for OU 1335, Southwest Test Area. The Workplan is dated April 1, 1996. EPA has found the Work Plan to be deficient. Enclosed is a list of deficiencies for which EPA recommends that SNL be allowed sixty days to respond.

If you have any questions or need additional information, please contact Mr. Allen T. Chang of my staff at (214) 665-7541.

Sincerely yours,

David W. Neleigh
David W. Neleigh, Chief
New Mexico and Federal
Facilities Section

Enclosure

cc: Mr. Bob Sweeney
New Mexico Environment Department
Ms. Stephanie Kruse
New Mexico Environment Department



SNL1033



HOWA SNL 1335

**LIST OF DEFICIENCIES
SANDIA NATIONAL LABORATORIES (SNL/NM)
RFI WORK PLAN FOR OU 1335, SOUTHWEST TEST AREA**

This work plan details the investigation of the following five (5) sites:

ER Site 14 - Burial Site (Building 9920)
ER Site 85 - Firing Site (Building 9920)
ER Site 91 - Lead Firing Site (Thunder Range)
ER Site 103 - Scrap Yard (Building 9939)
ER Site 117 - Trenches (Building 9939)

General Comments:

1. Future RFI report should present all the analytical data (these which are above SNL UTL) which is used as the basis for decision making. **(Best Professional Judgement (BPJ))** *Omitted.*
2. Sites which are listed on the HSWA permit, and for which SNL is proposing a VCM should still have all the analytical results submitted. The VCM report may function as the equivalent of the RFI report, provided all the sampling and analytical data. Otherwise, SNL needs to provide the RFI data. **(BPJ)** *Omitted.*
3. Sites which are proposed for NFA but not approved for NFA may require a separate RFI Work Plan, or an addendum to this RFI Work Plan, in order for the investigation to be completed. Additionally, Sandia has indicated that some of the NFA proposals have not been submitted to EPA or NMED as of this date. SNL/NM should specify the schedule for submittal of these NFA proposals. **(BPJ)**
4. In a May 7, 1996 letter, SNL/NM requested a Temporary Authorization for a VCM - Final Remedy Intended - at Site 91, Lead Firing Site. Why is this site included in this Work Plan if it is intended to be part of a VCM? Alternatively, why is the proposed VCM not included in the Work Plan discussion of this site? **(BPJ)**

Site Specific Comments:

- ER Site 14 - Burial Site (Building 9920)
1. Page 5-7, Section 5.2.3: The Report states that Figure 5.2-3 shows the probable location of the pit (which means Pit Type 1). Figure 5.2-3 only shows "Site 85 Firing Site 2 (Site 14 pit type two)" and "Site 85 Firing Site 1". According to the definition of those pits on Page 5-4, "Pit Type 2 is ... part of ER Site 85 (Firing Site 1)" and "Pit Type 3

was...associated with ER Site 85 (Firing Site 2)". It appears that Pit Type 1 is shown but not labelled correctly on Figure 5.2-3. SNL/NM should clarify the discussion on pit types and locations. (BPJ) *Not added, DOE OA is clear on this.*

2. *85* Page 5-20: Table 5.3-1 shows Lead and Barium exceeding their site respective upper tolerance limits. SNL/NM should indicate the depth at which those samples were taken. (BPJ) *Covered, Omitted.*
3. Page 5-24, Section 5.3.5.3: The Work Plan states that if the GPR detects pits or a trench to the west of the cable run boxes, five boreholes will be drilled to 8 ft. SNL/NM shall explain the rationale for only drilling to a depth of 8 feet. (BPJ) *Covered by #15.*

ER Site 91 - Lead Firing Site (Thunder Range)

4. Page 5-40, Subsurface Sampling: At locations 19 - 22, samples will be collected at depths of 6 inches to 3 feet. Since the area was impacted by the force of the explosion, SNL/NM shall at least take one sample at 5 foot deep in case contamination extends beyond the 3 foot depth. (BPJ)

ER Site 103 - Scrap Yard (Building 9939)

5. Page 5-54, 3rd Paragraph: 103E20 and 103E8, after cleanup, the area DU activities have dropped from 707 pCi/g to 18.2 pCi/g but they are still higher than area background UTL. Has it exceeded the action level? (BPJ) *papered Omitted.*
6. Page 5-53, first Paragraph: SNL/NM should investigate the used crucibles contaminated with radioactive materials. How has SNL/NM determined that they are not hazardous? What are the long-term plans for the crucibles? (BPJ)

ER Site 117 - Trenches (Building 9939)

7. Page 5-68, Section 5.6.5: SNL/NM shall submit confirmatory sampling results for COC₂ after completion of VCM. (BPJ) *for disposition OK Omitted.*

Investigative Methods for OU 1335

8. Page E-3, Section E.2.2: Since the surface soil of the most sites may contain the highest concentrations of contaminants and the concentration reduces with the increase of depth, surface soil sampling should be taken from less than 6 inches deep. (BPJ)