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MAR 17 1995

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Mr. Theodore Taylor
Program Manager
Environmental Restoration Program
Los Alamos Area Office
Los Alamos, NM 87545

Re: Review of Draft Accelerated Cleanup Processes Document
Los Alamos National Laboratory (NM0890010515)

Dear Mr. Taylor:

The Environmental Protection Agency (EPA) has reviewed the Draft document entitled "Los Alamos ER Project, Accelerated Cleanup Processes". The approach taken by Los Alamos National Laboratory (LANL) to voluntary corrective actions (VCAs) and expedited cleanups (ECs) appears acceptable.

However, EPA still has some concerns related to the establishment of cleanup levels for VCAs. In particular, the draft position paper entitled, "Guidance for Evaluation and Cleanup of Polychlorinated Biphenyls (PCBs)" indicates that the cleanup levels for PCBs will be in part based on a determination of future land usage. What is the method by which future land use determinations will be made for the sites which will be undergoing VCAs?

In addition, upon review of the list of proposed voluntary corrective actions (VCAs), several of the VCAs are in the HSWA permit, and do not appear to have obvious cleanup levels as indicated in the draft text. In particular sites 16-016(b and d) and 33-016 all appear to have potentially multiple contaminants including HE, metals and PAHs. Will these sites be cleaned up to background? How are the cleanup levels for many of these hazardous constituents being determined, especially if there are potentially cumulative effects. EPA would like to know the reasoning behind including these sites as VCAs rather than Ecs.

LANL HSWA 6/20/95

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Also, text for the draft document on accelerated cleanup processes does not indicate that sites considered for VCA will be listed in the HSWA permit.

If you should have questions or need additional information, please feel free to contact me at (214) 665-7441.

Sincerely,

David McLaughlin
for Barbara Driscoll, Geologist
New Mexico - Federal Facilities
RCRA Permits Branch

cc: Mr. Benito Garcia ✓
New Mexico Environment Department
Mr. Jorg Jansen
Los Alamos National Laboratory, MS M992