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May 18, 1995

MEMORANDUM

SUBJECT: Comments on the Los Alamos National Laboratory (LANL) document entitled *draft Evaluation and Cleanup of TPH in Soil*

FROM: Michael Morton *[Signature]*
RCRA Risk Assessment Team (6H-PA)

TO: David Neleigh, Chief
NM/FF Section

THRU: Arnold Ondarza, Chief *AO*
Administrative and Technical Section (6H-PA)

In response to your request dated May 2, 1995, for review of the Los Alamos National Laboratory (LANL) document entitled *draft Evaluation and Cleanup of TPH in Soil*, the following comments are offered for your consideration.

General Comments:

This document states that the purpose is to provide guidance for clean-up levels for Total Petroleum Hydrocarbons (TPHs) (pg 1, paragraph 1). However, no guidance is provided for development of clean-up levels for ecological protection. As such, tables, figures, site specific factors should designate that they represent human health guidance only. It is recommended that this guidance be revised to include the ecological component. For example, Figure 1 follows that if the TPH is from an UST and is within 50 ft of groundwater, the clean-up level is based on the NM UST regulations (see pg 8). No indication is provided on whether the UST clean-up levels will be protective of the impacted ecosystem.

On page 7, Table 3 lists 50 mg/kg as the LANL screening action level (SAL) for Total Aromatic Hydrocarbons (TAHs) in soils. LANL does not indicate how this value was derived other than to state that the value is consistent with NMED UST regulations. In addition, if the TPH is predominantly due to gasoline, benzene along with toluene, xylenes and ethylbenzene will be the predominant TAHs found. The SAL for benzene is 0.67 mg/kg. Therefore, even if TAHs are below 50 mg/kg and not exceeding the SAL, the potential for an exceedance of the benzene SAL, a TAH component, may exist. It is recommended that investigation of a site not be dismissed solely on the basis of TAHs below 50 mg/kg and that benzene concentrations be determined, especially if the TPHs are due to gasoline.



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Page 9 references an EPA-approved guidance document for petroleum products developed by the Massachusetts Dept. of Envir. Protection. Is this approved agency-wide or just within that regional office? Can we obtain a copy of the Massachusetts document from LANL?

If you have any questions regarding these comments, please contact Michael Morton, x8329.

CC: Barbara Driscoll