



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
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DALLAS, TX 75202-2733

JUN 27 1995

Mr. Theodore J. Taylor  
Program Manager  
Department of Energy  
Los Alamos Area Office  
Los Alamos, NM 87544

Re: Recalculation of Upper Tolerance Limits  
Los Alamos National Laboratory NM0890010515

Dear Mr. Taylor:

The Environmental Protection Agency (EPA) has completed a partial review of the following documents: *Statistical Comparisons to Background: Part I* dated March 28, 1995 and *Natural Background Geochemistry, Geomorphology, and Pedogenesis of Selected Soil Profiles and Bandalier Tuff, Los Alamos, NM: Draft* dated January 1995. A primary concern to EPA is the calculation of upper tolerance limits (UTLs) using a tolerance factor at the 99% confidence level. Use of the 99th percentile is not acceptable as it essentially allows for the use of almost three standard deviations from the mean for background values. This has created inflated UTLs in the presence of variable data from the background study. Los Alamos National Laboratory (LANL) should use a tolerance factor at the 95% confidence level. LANL should provide EPA with recalculated UTLs as soon as possible, so that EPA may review documents already submitted.

EPA will provide additional comments on both documents within the next few weeks, and is providing this letter in order to expedite reviews of documents already submitted.

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

Sincerely,

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

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



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