



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

LANL
HSA
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Barbara
Bill

Teri ✓
Susan ✓

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No final
Conclusion -

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

Re: **Draft Policy for Evaluation and Clean up of Total Petroleum Hydrocarbons (TPH), Los Alamos National Laboratory**

Dear Mr. Taylor:

The Environmental Protection Agency has reviewed the draft policy paper entitled, "Policy for Evaluation and Clean Up of Total Petroleum Hydrocarbons (TPH). Enclosed are our comments on this document.

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

Sincerely,

David Neleigh
David Neleigh, Chief
New Mexico - Federal
Facilities Section

Enclosure

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



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**Comments on Draft Guidance
Evaluation and Cleanup of TPH in soil
Los Alamos National Laboratory**

General Comments:

1. This document appears to set cleanup levels based on New Mexico Underground Storage Tank (UST) standards for areas other than UST cleanups. Los Alamos National Laboratory (LANL) may use these standards for actual UST cleanups which address petroleum products only and no waste including waste oil. These cleanup levels are not applicable to total petroleum hydrocarbon (TPH) cleanups which are not UST related. In any other instance LANL should use a risk based approach the same as for other cleanups under RCRA. X
2. This document states that the purpose is to provide guidance for clean-up levels for TPH (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 the impacted ecosystem.
3. 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.
4. Page 9 references an EPA-approved guidance document for petroleum products developed by the Massachusetts Dept. of Envir. Protection. It is misleading to indicate that this is an EPA approved document thereby implying that EPA national policy follows this guidance document. It is more likely that EPA Region 1 has reviewed this document and Massachusetts Department of Environmental Protection follows that particular guidance document. LANL should provide a copy of this document in their revised guidance.