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United States Government

Department of Energy

memorandum

Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

14-00000-10000

DATE: OCT 5 1995
REPLY TO:
ATTN OF: LAAMEP:2ET-006
SUBJECT: EPA Review Comments on RFI Report-Technical Areas 18 and 27

TO: Jorg Jansen, Project Manager, EM/ER, LANL, MS-M992

EPA, Region 6, has reviewed the RCRA Facility Investigation Report (RFI) for Potential Release Sites in TA-18 and TA-27 submitted by LANL (Field Unit 2) in January 1995. The EPA has found the report to be deficient and attached you will find the list of deficiencies in which LANL has 60 days to respond. Please have Field Unit 2 prepare a Notice of Deficiency Response in concurrence with Field Unit 2 Field Project Coordinator, Everett Trollinger.

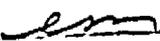
Should you have any questions, please contact Mr. Trollinger of my staff at 667-5801.



Theodore J. Taylor
Program Manager
Environmental Restoration
Program

Attachments

cc:
See page 2

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OCT 13 1995


1.4.2.6.1.10.1.4

Everett -
Please prepare
memo to Jorg.
Ted

32. 0010001. 01.1.14



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

SEP 28 1995

Mr. Theodore J. Taylor
Program Manager
Department of Energy
Los Alamos National Laboratory
Los Alamos, NM 87544

Re: RFI Report Technical Areas 18 and 27
Los Alamos National Laboratory (NM 0890010515)

Dear Mr. Taylor:

The Environmental Protection Agency (EPA) has reviewed your RCRA Facility Investigation Report for Potential Release Sites in Technical Areas 18 and 27, and found it to be deficient. Enclosed is a list of deficiencies which you have 60 days to respond to.

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

Sincerely,

David W. Neleigh
for David W. Neleigh, Chief
RCRA New Mexico - Federal
Facilities Section

Enclosures

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



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**List of Deficiencies
Los Alamos National Laboratory
Operable Unit 1093
Technical Areas 18 and 27**

General Comments:

1. EPA agrees that LANL may request a Class 3 permit modification for removal of the following units from the HSWA portion of the permit:
 - 27-003
 - 27-001
 - 18-007
 - 18-001(c)
2. 3.2.2 Soils, p. 3-4 - LANL should provide the locations and relevant information of any soil samples collected for the background database which were collected near the location of Technical Areas 18 and 27.
3. 3.6 Waste Criteria, p. 3-6 - Using the stated approach for TC screening levels is only acceptable for solid wastes/soils which contain no liquids.
4. 4.2.3 Evaluation of Results, p. 4-11 - EPA would prefer that the analytical results that are in question be included in the evaluation of results section for each SWMU, not in a different section several pages away.
5. Figure 4-8, p. 4-12 - Please include the sampling identification number for each sample point taken.
6. 4.4.3 Evaluation of Results, p. 4-30 - One electromagnetic anomaly was detected; however, LANL did not make a determination if material was actually buried at the location. LANL should have followed through to determine what the anomaly was whether or not LANL thought the anomaly was the actual guns they were looking for.
7. Appendix A - EPA will provide separate comments related to the background study. LANL should be aware that their approach used for calculating the upper tolerance limit was not acceptable to EPA.

4-10500001-10114