



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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JUL 3 - 1995

JUN 27 1995

LANL HS WP 6 EN 11001

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

Re: Notice of Deficiency: Request for Permit Modification
Four Solid Waste Management Units Dated April 21, 1995

Dear Mr. Taylor:

The Environmental Protection Agency (EPA) has reviewed the Class 3 permit modification dated April 21, 1995 which included proposed expedited cleanups (ECs) for four solid waste management units (SWMUs). Enclosed is a list of deficiencies which need to be addressed prior to EPA considering these ECs as possible final remedies for the four SWMUs.

LANL has established cleanup levels based on a future land use designation of industrial use, should the land use designation change in the future then LANL will need to revisit each affected site to ensure that cleanup levels are adequate for the new land use, such as residential use.

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

Sincerely,

W. K. Honker, P.E.

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

Enclosure

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



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**List of Deficiencies
Class 3 Permit Modification
Expedited Cleanups
Dated April 21, 1995**

General Comments:

1. All upper tolerance limits (UTLs) based on LANL's Assessment Council position paper "Interim Guidance for Evaluating PAHs in Soil" have been rejected by EPA in a letter dated May 19, 1995. The UTL values for polycyclic aromatic hydrocarbons (PAHs) are inappropriate, and should not be used as a basis for determining if remediation is required at a site or for the elimination of certain PAHs from consideration in cleanup values.
2. LANL should present risk values starting with 1E-06 independent of which future land use scenario is determined. EPA may use a cleanup level for an excess cancer risk of 1E-06 as a target level, whether or not final cleanup levels will have to meet that risk level is a risk management decision to be made by EPA after the appropriate risk assessment procedures have been followed. Therefore, LANL should present the appropriate risk numbers. In addition, all numbers used in calculations should be included in the expedited cleanup plan including calculations for those constituents with a noncarcinogenic hazard index of one or less.
3. For determining the number of verification samples to be collected LANL should be using the following guidance: *Risk Assessment Guidance for Superfund, Volume I - Human Health Evaluation Manual (Part B, Development of Risk-Based Preliminary Remediation Goals)* (EPA 1991) rather than *Methods for Evaluating the Attainment of Cleanup Standard, Volume I, Solid Media* (EPA 1988). LANL should recalculate verification sampling based on this document for all expedited cleanups.

SWMU 48-002(a) and 48-002(b) -

3. LANL should provide the information as indicated in deficiency #2 for mercury and benzopyrene.
4. Section 2.2.3 Summary and Evaluation of Results, p. 7 - Bullet #1 indicates that highest concentration of mercury in soil was 62 ppm; however, XRF data in Annex 6.9 indicates mercury was found at 50110 ppm at sampling location 48-2060.
5. Section 2.4.1.1 SWMUs in Place, p. 8 - Bullet #1 indicates that mercury vapor screening results showed elevated concentrations of mercury at the soil immediately adjacent to the wall and on the wall. This information should be provided in the reports.

6. Section 2.3 - There should be a discussion of the proposed disposition of the all waste.

SWMU 18-001(b) -

7. Section 2.2.3 Evaluation of Results, p. 5 - Were the water samples from the manholes taken as filtered or non-filtered for metal analysis?
8. Additional ground water sampling was indicated in the RFI work plan dated May 1993. If this sampling was conducted the analytical information should be provided. If sampling was not conducted a rationale should be provided.
9. Are contaminated sediments restricted to the manholes? Although this plan states that the manholes act as catchments for sediments and fluids, low points/areas along the sewer line may contain sediments as well. Breaks in the line may have created a mixing area between contaminants and the surrounding soil or ground water.
10. 3.5 Verification Plan - LANL makes the assumption that water samples collected in the manholes are indicative of the surrounding media. Breaks and cracks in the sewer line should be located either by a tracer test and/or a video log before the proposed cleanup plan is initiated. Following location of cracks, characterization of the surrounding soil may be required.

SWMU 8-003(a) -

11. The expedited cleanup plan should indicate which facilities are being considered for disposal of the material.