



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

DEC 09 1994

Mr. Joseph C. Vozella  
Assistant Area Manager  
Environment, Safety and Health Branch  
Department of Energy  
Los Alamos National Laboratory  
Los Alamos, NM 87544

Re: RFI Phase Report, Operable Unit 1071, SWMU Aggregate 0-D  
Los Alamos National Laboratory, NM0890010515

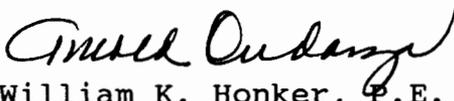
Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has reviewed the RFI Phase Report dated March 30, 1994, for Operable Unit 1071, SWMU Aggregate 0-D, Ordnance Impact Areas and found it to be approvable. The primary problem associated with these solid waste management units (SWMUs) was unexploded ordnance (UXO) and ordnance explosive waste (OEW). The units which were impacted have had all UXO and OEW removed, and there appears to be no high explosive residue at the sites. Los Alamos National Laboratory (LANL) may request removal of the following SWMUs from the permit via a Class 3 permit modification: 0-011(a) and 0-011(c-e).

EPA has enclosed several suggestions which should improve future reports. In future reports, information related to background and data quality for analysis will be more crucial.

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

Sincerely,

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

Enclosure

cc: Mr. Benito Garcia ✓  
Bureau Chief, Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
Mr. Jorg Jansen  
Program Manager, Environmental Restoration Program  
Los Alamos National Laboratory, M992



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## **RFI Report Suggestions**

- 1. Background information as presented for inorganics is not meaningful unless it can be demonstrated that the background data was collected at the same depth and from similar formations as the site samples. Future reports should indicate the location of background samples, and analytical methods including extraction methods used for those samples. LANL should also ensure that the methods used for extraction of soil samples is standardized, so that data is comparable.**
- 2. Table 4 does not indicate which sample results are the original lead samples and which were taken later. Nor does the Table indicate which samples were collected from the upper granular versus underlying clay-rich layer.**
- 3. If data has been qualified, for example found to be estimated or "J" data, this should be noted on the Tables.**
- 4. Analysis results should be summarized as in Table 6 which indicates results for each sample, as opposed to Table 5 which shows the minimum, mean and maximum for a group of samples. The practical quantitation limit (PQL) or background values should be indicated on each table.**
- 5. Analytical results should be compared with background or PQLs to determine if the extent of contamination has been defined.**