

Mr. Joseph C. Vozella
Assistant Area Manager
Office of Environment and Projects
Department of Energy
Los Alamos Area Office
Los Alamos, NM 87544

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has reviewed Los Alamos National Laboratory's RCRA Facility Investigation report for solid waste management unit 0-032. EPA approves this document, and provides the enclosed comments on this report to improve the quality of future reports.

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

Sincerely yours,

Allyn M. Davis

Enclosure

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

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**Comments on RFI Report for Potential Release Site 0-032
Los Alamos National Laboratory**

General Comments:

1. LANL shall include the soil boring descriptions and the PID/FID readings in future reports.
2. EPA has not approved the LANL's background study, and has already indicated that UTLs must be recalculated based on the 95% confidence interval rather than 99% confidence interval.
3. EPA will not consider background values for polycyclic aromatic hydrocarbons (PAHs), and will evaluate all values against the action levels. No PAHs should be eliminated as potential contaminants of concern unless they do not exceed an action level. In the future, LANL should seek approval for such approaches prior to inclusion in reports or work plans.
4. In the absence of background data for ground water then LANL should compare values with MCLs.
5. Figure 3, p. 11 - The logic flow chart shown is for LANL's assistance, EPA does not agree with this flowchart.
6. Page 32; 1st paragraph: EPA's RCRA MCLs are not based on filtered samples. Furthermore, screening action levels approved by EPA will be on unfiltered samples.