

MAR 26 1996

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Mr. Benito Garcia, Chief
Hazardous and Radioactive
Materials Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, NM 87502

Re: Notice of Deficiency for RFI Report on SWMU 0-030(g)
Los Alamos National Laboratory (NM0890010515)

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed the RFI Report dated November 13, 1995, for solid waste management unit 0-030(g) at Los Alamos National Laboratory (LANL) and found it to be deficient. While the site no longer poses a human health risk, it must still be evaluated with an ecological risk assessment. EPA recommends that LANL be given sixty days to respond to the attached list of deficiencies.

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

Sincerely,


David W. Neleigh, Chief
New Mexico and Federal
Facilities Section

Enclosure

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List of Deficiencies
RFI Report for SWMU 0-030(g)
Los Alamos National Laboratory

1. **2.3 Hydrology:** LANL makes the statement that contamination from this site cannot affect ground water which is not substantiated by information in the paragraph. When in operation this outfall may have affected surface water in Acid Canyon, and may have infiltrated alluvial ground water which may be interconnected to other perched zones. LANL might substantiate the statement that this site probably did not affect the main aquifer.
2. **3.2 Methods for Comparing Site Data with Background Data, p. 15:** While EPA does not agree with the manner in which the upper tolerance limit (UTL) for each background constituent (based on the estimated 95% upper confidence bound of the 99th percentile of the constituent's background concentration distribution) was calculated, the actual conclusions reached for this site would not be modified based on a recalculation of the UTL values. No response required.
3. **3.4 Comparison with Ecotoxicological Screening Action Level, p. 18:** LANL will need to reevaluate the ecological risk from this site based on agreements with EPA and NMED. The ecological risk approach outlined here was not approved by EPA or NMED. No response required.
4. **4.3 Human Health Screening Assessment, p. 37:** In the future, LANL should evaluate the risk remaining at the site based on confirmation sampling or contaminants left in place. Based on the information presented it does not appear that a human health risk remains at this site; however, an ecological assessment will need to be conducted following agreement on the approach by all involved parties. No response required.
5. EPA Region 6 has a policy to address all levels of polychlorinated biphenyls above 1 mg/kg in any drainage areas. The surface drainage area will need to be included in the ecological risk assessment for this area. No response required.
6. LANL needs to provide the tabulated information from the confirmation sampling which was conducted in order to document completion of the excavation.