



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



DEC 24 1996

Mr. Benito Garcia, Chief
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
2044A Galisteo St.
Santa Fe, NM 87505

RE: Technical Review of LANL RFI Report for PRSs 0-028 (a, b) in
TA-0, EPA I.D. No. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a technical review of the Los Alamos National Laboratory (LANL) RCRA Facility Investigation (RFI) Report for Potential Release Sites (PRSs) 0-028(a, b) located in Technical Area 0. The Report is dated July 22, 1996. Enclosed is a list of deficiencies which EPA recommends that LANL be allowed sixty days to respond.

If you have any questions or need additional information, please contact Allen T. Chang of my staff at (214) 665-7541.

Sincerely yours,

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

Enclosure



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FILE LANL HSWA Fu-1 ou 1071 TA-0-028(a,b)

JK

LIST OF DEFICIENCIES
LANL RFI Report for PRSS 0-028(a,b)
in Technical Area 0

Site Specific Comments:

1. Page 31: first paragraph: "Thirty-seven samples were collected from PRSS 0-028(a,b) were analyzed for VOCs and SVOCs". No rationale was provided to explain the deviation from RFI Workplan for OU 1071, Page 5-84: "Ten cores will be augured at the golf course and six at the ball fields"... "Three samples will be collected from each core hole; one from the uppermost 6 in., a second from the interval midway through the soil or from the interval with a positive field screen response, and a third from the tuff contact". In accordance with the approved RFI Workplan, a total of 16 core holes would be augured with 3 samples taken per core hole; this yields a total of 48 samples (16 X 3).

The RFI Report only references and provides data for 37 samples. Core Holes Nos., 00-04754, 00-04755, 00-04759, 00-04763, 00-04764 and 00-04765, listed in Table 5.1.6-1 (RFI Report) did not have three (3) samples taken per core hole as indicated in the RFI Workplan. LANL shall explain the deviation from the RFI workplan with regards to the total number of samples taken and why the previously specified sample intervals were not sampled for each core hole. **(Best Professional Judgement (BPJ))**

2. Page 34: first paragraph: It states, "Of the organics that were not detected in any sample collected from PRSS 0-028 (a,b), seven had reporting limits (RPLs) greater than SALs. ...In addition, twenty-eight others do not have SALs to which the RPLs can be compared."

To have RPLs higher than SALs is unacceptable. LANL shall submit the RPLs information to determine whether re-sampling is necessary. The information includes RPLs of those seven chemicals along with their respective SALs, and of the twenty-eight undetected chemicals. The EPA/NMED will assess the hazardous effect of those chemicals in accordance with EPA's health based number from IRIS data. **(BPJ)**

3. Sections 2.2.1 (geologic setting) and 2.3.2 (groundwater) need to provide a more complete discussion of the alluvial fan hydro-geology and explain why the alluvial fan contains no perched aquifers or springs at the site. It is a fact that alluvial fans present geologic conditions that are excellent for obtaining groundwater in large quantities from wells sunk into their permeable materials. Typically, water infiltrates readily into the coarse materials at the head of a fan and moves down the fan under hydrostatic head. During much of the time stream channels across a fan are dry and much of the water is likely to sink into the coarse alluvium

near the fan apex. It is extremely rare for an alluvial fan not to contain useable sources of ground water. The report's determination that no perched aquifers or springs exist is contrary to the geological nature of an alluvial fan and should be verified by further study (See Section 2.3.2). The geologic description should also discuss how the fans age ("paleo fan") influences the ground water supply. (BPJ)