



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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DALLAS, TX 75202-2733

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MAR 13 1997

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



Re: TA-0 RFI Report NOD comments on PRS 0-031(b), Los Alamos
National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed LANL's
RFI Report for TA-0, dated August 9, 1996, and has found the Report
to be deficient. Enclosed are a list of deficiencies for your
review.

Should you have any questions, please feel free to contact
Mr. Rich Mayer at (214) 665-7442.

Sincerely,

for *Rich Mayer*
David W. Neleigh, Chief
New Mexico and Federal
Facilities Section

Enclosure



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Consent to publish in the public domain

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NOD Comments on the RFI Report for TA-0, PRS 0-031(b)

General Comment No. 1: EPA did not review the risk/screening assessment sections of the RFI report. When LANL provides the additional information/data requested by EPA, then a review of the risk assessment sections will occur. Also, EPA recommends that LANL include a ecological assessment section in this and in future reports; otherwise, EPA can not approve a no further action decision, unless the site is obviously clean and the background numbers are reasonable. **BPJ.**

General Comment No. 2: When LANL takes samples into the vertical walls of a removed UST or underground pipeline, how far does the sampler penetrate into the wall? Please explain in the revised report. **BPJ.**

General Comment No. 3: In the revised RFI Report, please include the lithologic soil descriptions for each soil coring, which would include any noted visual or olfactory contamination. **BPJ.**

General Comment No. 4: When verifying an extent of a release, immunoassays or TPH analysis are generally unacceptable, unless they have been approved by the EPA or NMED. **BPJ.**

General Comment No. 5: EPA does not accept immunoassay tests for determining whether a sample is a hazardous waste. **TC Rule.**

General Comment No. 6: Please provide the background concentrations for TPH at this site, since TPH analysis were used exclusively in some confirmatory samples. **BPJ.**

General Comment No. 7: Although there are several tables in the RFI Report containing laboratory analytical results/screening information, the way the information is presented is very awkward to review and it appears that some analytical information is missing. For each investigative subsection of this SWMU (e.g., the East Auxiliary Pipe Investigation) please include the following:

- 1) A table which includes all laboratory analytical results. This table should include the sampling interval, the analytical method, the detection limit, and whether the sample was considered a confirmatory sample;
- 2) A table which includes all immunoassay and TPH results. This table should include whether the sample was confirmatory in nature; and,
- 3) Maps which locate all samples taken. **BPJ.**

Page 17; Section 4.1.1: When discussing the various problems associated with each analytical request, please include the sample numbers so that EPA can locate the sample results in the appropriate tables. This comment pertains to all paragraphs under Sections 4.1.1 and 4.1.2, which discuss QA/QC problems associated with a particular analytical request. BPJ.

Page 29; 1st paragraph: How deep from the surface was the bottom of tank No. 1? BPJ.

Page 29; last paragraph: LANL mentions using an immunoassay system to analyze for total BTEX. Has this test been approved by NMED or EPA? Also, this test is not acceptable for determining whether a soil sample is a waste. BPJ.

Page 31; 2nd paragraph: LANL mentions that a NMED representative was observing the removal of Tank No. 1, was this representative an UST or oversight person? BPJ.

Page 31; 3rd paragraph: LANL mentions that an immunoassay analysis of sample AAA8516 indicated the presence of BTEX compounds at a concentration of 8.3 ppm; however, the laboratory analysis were below detection limits. What was the PID reading for this location and how does LANL resolve these discrepancies? Does LANL assume that the laboratory analysis is always correct? In addition, EPA cannot find the lab analysis for soil samples AAA8519 and AAA8516. Please include them in the revised Report. BPJ.

Page 31; 4th paragraph: EPA believes that LANL should have taken a confirmatory sample where the lines and vents were removed, e.g., the bottom of the trenches. What is the purpose of removing the tank if no verification samples are taken. Also, why was the XRF for lead not used since this site had the potential for having leaded gas? BPJ.

Page A-1; Table A-1: Please provide a location map for the field screening results of the PID. BPJ.

Page 33: EPA cannot find the lab analysis (VOC's, SVOC's and lead) for soil samples AAA8521, AAA8517, AAA8538, AAA8542, AAA8537, AAA8543. Please include them in the revised Report. BPJ.

Page 36; 3rd paragraph: EPA cannot find the lab analysis (VOC's, SVOC's and lead) for soil samples AAA8521, AAA8517, AAA8538, AAA8542, AAA8537, AAA8543. Please include them in the Report. BPJ.

Page 36; 4th paragraph: EPA cannot find the lab analysis (VOC's, SVOC's and lead) for soil samples AAB5447 and AAB5448. Please include them in the revised Report. BPJ.

Page 36; last paragraph: When LANL speaks of preliminary analytical results, are they referring to the immunoassays? **BPJ.**

Page 37; 3rd paragraph: EPA cannot find the lab analysis (VOC's, SVOC's and lead) for soil samples AAB0387, AAB0388 and AAA8411. Please include them in the revised Report. **BPJ.**

Page 37; 3rd paragraph: Please include the results of the samples with the missed holding times in the revised Report? **BPJ.**

Page 37; 4th paragraph: EPA cannot find the lab analysis results (VOC's, SVOC's and lead) for soil samples AAB6652 and AAB6653. Please include them in the revised Report. **BPJ.**

Page 37; Concrete Curb: Please provide the analytical results and the immunoassays results in the revised Report for this investigation. **BPJ.**

Page 44; 1st paragraph: Why is the organic vapor readings drilling cutoff at 100ppmv? EPA believes that the drilling cutoff point should be much lower. If the reading is 90 ppmv, does LANL stop drilling? Also, please include the results of soil sample SS-02 that exceeded the holding times. What was the organic vapor reading for SS-3 at its deepest depth? **BPJ.**

Page 73; Conclusions and Recommendations: LANL mentions that the site does not require any further investigation under the NMED UST program, inferring that NMED has approved. Please provide the approval letter and has this been conveyed to the Hazardous Waste Bureau.

In addition, EPA cannot agree upon a no further action decision until all requested information (the above comments) is reviewed. EPA is not convinced that the extent of contamination has been determined for SWMU 0-31(b) from the various points sampled. The information requested in the revised Report should give EPA a clearer picture of the investigation. **BPJ.**

Comments to NMED

EPA has the following comments/concerns about this investigation/Report:

1. LANL mentions in the Report that the NMED UST program has or will approve this investigation, therefore, no further action is needed. If the State has an agreement that HRMB will defer or accept the findings of the UST program, then that is acceptable. However, please check and see if LANL's statements are true or is LANL mistaken.
2. Under the RCRA corrective action program, using immunoassays or TPH for confirmation samples would not be acceptable. Also, not taking confirmatory samples

would be unacceptable.

3. On one part of the investigation, the distribution line, LANL mentions that they would stop drilling if the PID reading on the a core sample was 100 ppmv or less. EPA believes that this number is to high to stop drilling.