



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

*Stu*

JUN 04 1997



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

Re: **Second 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) in conjunction with its corresponding notice of deficiency response dated March 6, 1997, and found it to be deficient. The 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 Mr. David Vanlandingham at (214) 665-2254.

Sincerely,

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

Enclosure



*TZ*

**List of Deficiencies**  
**RFI Report for SWMU 0-030(g)**  
**Los Alamos National Laboratory (NM0890010515)**

### 2.3 Hydrology

LANL contends that "the outfall drainage from Potential Release Site 0-030(g) drained down a steep bedrock slope (45 degrees)" and that "it is highly unlikely that any significant infiltration occurred on such a steep slope" (NOD Response EM/ER:97-046 of 03/06/97). However, the RFI Work Plan for SWMU 0-030(g) plainly states that "samples of channel sediments will be collected from sediment catchments adjacent to or immediately down slope of septic drain outfall points...two sediment samples will be collected as close as possible to the outfall points from sediment catchments..." Figure 5-44 shows that two sediment samples were to be collected from the outfall before the elevation dropped to 7210'. According to the work plan and NOD response dated 03/06/97, however, the first 100' of outfall channel flow remains unsampled. EPA understands that further investigation of the site revealed no sediment catchments on this slope from which to sample. However, either the site should be adequately researched to determine sampling areas before the RFI work plan is written, or all rationale for deviations from the original work plan should be documented in the RFI report. No response required.

#### 4.1.8 Outfall Sampling Activities, and NOD Response

Outfall surface samples AAB00275 and AAB0278 tested positive in 1994 for PCBs, yet subsurface samples were not taken from these locations. The deepest outfall subsurface sample was taken at 6 inches bgs (sample AAB3573). Similarly, most of the outfall samples collected in 1996 also tested positive for PCBs, but sample depth information is omitted from the NOD response. EPA contends that although PCBs may tend to adsorb in a shallow layer of soils, LANL should take samples at a depth necessary for adequate characterization. A surface sample which contains PCBs slightly less than the SAL (1ppm) would definitely indicate the need for subsurface characterization.

### 4.3 Human Health Screening Assessment

The multiple-constituent evaluation (MCE) performed on sample ID#AAB0275 is both inadequate and inaccurate. The PCB components (of highest magnitude in this sample) Aroclor 1254 and Aroclor 1260 were omitted from the MCE of carcinogenic effects. Furthermore, the normalized values of chlordane and

dichlorodiphenyl dichloroethane are incorrect. Recalculation of the MCE, including PCB concentrations, yields a normalized value almost three (3) times that of the reported value (2.87 vs. 1.04), indicating the need for further evaluation.

The statement is made (paragraph 3 of page 37) that "laboratory operations are unlikely to be the reason for the presence of these constituents at SWMU 0-030(g); furthermore, these constituents should not pose an unacceptable carcinogenic human health risk at this site even when considered in combination." Regardless of the origin of these constituents (Dieldrin, DDD, DDE, and DDT), the MCE of this sample demands that LANL submit a thorough risk assessment using this data before concluding that there is no unacceptable carcinogenic human health risk at this site. A similar statement is made ("these SAL exceedences should not pose an unacceptable risk to human health") in paragraph 1 of page 39 without addressing any risk assessment data. Discrepancies in and a general lack of data forces EPA to question the integrity of LANL's risk assessments.