



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

*Sta -
Please forward
to LANL/DOE
by 11/2/97 or resubmit
to EPA w/revision
by some date
Smith*

NOV 28 1997

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

Re: NOD Comments on the RCRA Facility Investigation Report (RFI)
for PRSS 0-003 and 0-012, Los Alamos National Laboratory
(LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed
LANL's RFI Report for PRSS 0-003 and 0-012, dated September 1997,
and has found the Report to be deficient. Enclosed are the
deficiencies for your review.

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

Sincerely,

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

Enclosure



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NOD Comments on the RFI Report for PRSs 0-003 and 0-012

PRS 0-003

General Comment: Please include the soil boring descriptions and the PID/OVA readings for each PRS in the revised report.

Page 23; 4th paragraph: LANL mentions that the soil cuttings from the augering were visually screened; however, LANL should also screen the cuttings for VOCs. Also, LANL should not be using hand augering to obtain VOC samples, as the sample integrity would be compromised. Please clarify how the VOC samples were taken.

Page 27; Evaluation of Inorganics: Please provide all sampling results in the revised report. LANL only provided results above UTL background.

Evaluation of Organic Chemicals: Please provide the 2.5 to 3 foot and the 2.6 to 3.1 foot soil interval analytical results in the revised report.

Page 33; Conclusions and Recommendations: EPA cannot agree on a NFA determination for this PRS until the requested information is submitted.

PRS 0-012

Page 34; last paragraph: Is LANL saying that the blow-off tank never in its history of operation had effluent discharged to Los Alamos Canyon? If this is true, then why did LANL take surface soil samples from two drainage channels? Please clarify in the revised report.

Page 36; Field Investigations: Since the actual makeup/components of this PRS is different from originally conceived, EPA feels that subsurface soil samples should be taken underneath the tank to confirm that no contamination exists. EPA does not put any faith in LANL's leak test that was performed.

Page 47; Risk-Based Screening Assessment: Why is LANL performing a screening assessment on the soil samples taken from the drainage areas if the tank never released effluent to the drainage areas? Please clarify.

Page 51; Conclusions and Recommendations: EPA cannot agree on a NFA determination for this PRS until the requested information is submitted.