



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

December 10, 1997

*for file
forward comments
by 1/23/98 or
received by EPA
by the date of return
12/18/97*



11/10/97/00
11/10/97/73

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

Re: Los Alamos National Laboratory
EPA ID# NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed the RFI Report for Potential Release Sites (PRSS) 0-034(a,b), 73-001(b), and 73-004(c,d). This document was submitted to EPA by letter dated September 30, 1997, and was received by EPA on October 20, 1997.

PRSS 0-034(a,b) are areas where concrete was manufactured and where fill dirt was stored for residential housing use, respectively. The RFI recommends No Further Action (NFA) at these sites. EPA concurs with these recommendations, as these sites have apparently never been used for the management of RCRA solid or hazardous wastes.

PRS 73-004(c) is the former airport terminal sanitary septic system. A site survey was conducted in June 1996 in accordance with the RFI Work Plan, but the location of the septic system could not be determined. The septic system was possibly removed when the airport terminal was demolished or underlies the existing airport apron. The septic system was not known to be ever handle RCRA solid or hazardous wastes. The RFI report recommends NFA at this site, and EPA concurs with this recommendation.

PRS 73-001(b) is a pit which was used for waste oil disposal. The pit is located within a debris disposal area, PRS 73-001(d). Quantitative sampling was performed at PRS 73-001(b) during the investigation of PRS 73-001(d). However, sampling information for PRS 73-001(b) is not included in this report and will be submitted in the RFI Report for PRS 73-001(d).



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PRS 73-004(d) is the site of a former septic system which served the Los Alamos Airport landfill office. This site is located within the main airport landfill, 73-001(a). The RFI Work Plan states that PRS 73-004(d) will be investigated as part of PRS 73-001(a).

The RFI report recommends NFA for PRSs 73-001(b) and 73-004(d) based on NFA Criterion 1 from the *Environmental Restoration Document of Understanding (DOU)* (1995). This criterion states "the site cannot be located or has been found not to exist, is a duplicate PRS, or is located within and therefore investigated as part of another PRS." EPA believes that "No Further Action" means no further action is required at the indicated site. However, further investigation is needed or has been performed at PRSs 73-001(b) and 73-004(d) regardless of whether these sites are located within other sites. Granting NFA at PRSs 73-001(b) and 73-004(d) does not ensure the Administrative Authority that further investigation will take place; in fact, it implies that these sites have been adequately characterized by LANL and are known not to pose an unacceptable human health and ecological risk. For this reason, EPA believes that, in scenarios where a site is located within another site, human health and the environment are better protected by either retaining the original PRS or SWMU site designation or combining the sites through HSWA permit modification.

A review summary is attached. Should you have any questions, please feel free to contact Mr. David Vanlandingham at (214) 665-2254.

Sincerely,


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

Enclosure

Review Summary
RFI Report for Potential Release Sites
Technical Areas 0 and 73
Los Alamos National Laboratory (NM0890010515)

Sites where No Further Action appears to be appropriate:

PRS 0-034(a)
PRS 0-034(b)
PRS 73-004(c)

Sites where No Further Action is not appropriate but may be incorporated into other sites through permit modification:

PRS 73-001(b)
PRS 73-004(d)