



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

*Step -
Please forward these
comments to LANL/DOE
by 3/20/98 or receive
to EPA by same date
with rationale for remaining
Benito
2/19/98*



February 5, 1998

6/9/98
1/10/01/1
1445A LANL 1/107/0

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

**RE: Review of LANL VCA Completion Report for PRSs in Group 1,
EPA I.D. No. NM0890010515**

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a technical review of Los Alamos National Laboratory (LANL) RCRA Voluntary Corrective Action (VCA) Completion Report for Potential Release Sites (PRSs) in Group 1, dated September 12, 1995.

Based on the information provided in the report, the EPA has found parts of the Report to be deficient and enclosed is a list of deficiencies. The EPA recommends that LANL conduct further investigations and submit supplemental information. If you have any questions or need additional information, please contact Allen T. Chang of my staff at (214) 665-7541.

Sincerely yours,

for
Richo Meyer

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

Enclosure



6983

LIST OF DEFICIENCIES
LANL VCA COMPLETION REPORT FOR GROUP 1

1. The sample and analysis plan (SAP) of PRSs C-00-036(a,b,c) was later modified to eliminate PCB analysis. What was the previous concern so that PCB analysis was included in the plan? Please submit a copy of the original SAP. (**Best Professional Judgement, (BPJ)**)

PRS C-00-036(a) - Borrow Pit #1

2. Page 1, 4th paragraph: The report states, "SVOC analysis was added to identify any polycyclic aromatic hydrocarbons that may have leached from the asphalt". Since there were two waste piles containing asphalt, LANL should sample both piles. Leaving one pile un-examined, how could LANL claim, "...no detectable, residual contamination is present in the soil at any of the three VCA sites."? LANL must sample the third pile. (**BPJ**)

PRS C-00-036(b) - Borrow Pit #2

3. Due to the fact that some materials specifically associated with Laboratory operation were found, LANL shall sample all four waste piles instead of one pile. (**BPJ**)

PRS C-00-036(c) - Borrow Pit #3

4. Page 15, CORRECTIVE ACTION: The SAP was first modified by adding total metal analysis and eliminating PCB analysis. Later, on page 16, the total metal analysis was then reduced to lead analysis because "Based on a review of the existing data and visual screening, lead shot was presumed to be at the site."

Where are the existing data? Please submit a copy. LANL shall use analytical results, not visual screening, to exclude a hazardous constituent. Please sample the sand backstop and the metal pipe pile at 0 - 6 inch for total metal analysis. (**BPJ**)

PRS C-00-036(d) - Borrow Pit #4

5. This site contains corrugated metal pipe (CMP) pile and concrete pile. LANL shall sample the soil of both piles, after removing the debris, at 0 - 6 inch for total metal analysis. (**BPJ**)

PRSs 09-010(a and b) - Waste Container Storage Areas

6. Discussion regarding the VCA activities for PRSs 09-010(a,b) was omitted from the report. LANL shall include them in the revised report. (**BPJ**)