



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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*Steph
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LANL/DOE by
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by the same date
with some
/ 2/27/98*

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HEAVY LABEL 1/107/10

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

Re: Comments on the Supplemental Information to the Voluntary
Corrective Action (VCA) Completion Report for SWMUs 0-
030(l), 0-030(m), and 0-033(a), Los Alamos National
Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed
LANL's Supplemental Information to the VCA Completion Report for
SWMUs 0-030(l), 0-030(m), and 0-033(a), dated November 18, 1997,
and has found the Report to be relatively complete.

However, EPA disagrees with some of LANL's conclusions and
recommendations. EPA will require LANL to perform some
additional sampling at PRSS 0-030(l) and 0-030(m). Enclosed are
EPA's comments and recommendations regarding the PRSS contained
in this Report.

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

Sincerely,

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

Enclosure



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**Comments and Recommendations on the Supplemental Information
to the Voluntary Corrective Action Completion Report for
PRSs 0-030(1), 030(m), and 0-033(a)**

PRS 0-030(1)

General Comment: EPA is satisfied with the sampling and removal of the tank and the inlet piping to the septic tank. **However, as a future warning, EPA requires that all confirmatory soil samples be lab analyzed, not XRF analysis.**

EPA is not satisfied with the sampling performed in the outfall area of this PRS. Reasons being:

1. Samples were only taken to a six inch depth;
2. Samples were not lab analyzed. The use of XRF analysis only are not acceptable for determining the horizontal and vertical extent of contamination in RFI investigations;
3. Only 2 sample locations downgradient of the outfall;
4. The two samples taken were 40 feet from the outfall and were taken within 5 feet of each other; and,
5. It is not clear whether the samples were taken in the drainage way of the outfall effluent.

Recommendation: LANL shall submit a sampling plan to NMED which addresses the above concerns about the outfall sampling.

PRS 0-30(m)

General Comment: Confirmation samples taken underneath the septic tank and underneath the pipeline for inorganics were not lab analyzed. XRF analysis were used, which is unacceptable, especially without any laboratory analysis taken in conjunction. Also, the investigation samples taken underneath the exiting pipe used only XRF analysis, with no lab analysis. This is unacceptable. Also, did this PRS have an outfall?

Recommendation: LANL shall submit a sampling plan to NMED which

addresses the above concerns about the confirmation sampling performed underneath the septic tank and the pipeline.

PRS 0-033(a)

General Comment: EPA has no problem with accepting the NMED UST letter granting No further Action for this PRS. However, it is up to NMED HRMB to make this determination.