



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

3/24/2000
These should
be forwarded to
Doe/Trade by
9/12/97



Copy of Mr. Garcia's report

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 Voluntary Corrective Action (VCA)
Completion Report for SWMU 1-003(d), Los Alamos National
Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed
LANL's VCA Report for SWMU 1-003(d), dated August 21, 1996, and
has found the Report to be deficient. Enclosed are a list of
deficiencies for your review.

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

Sincerely,

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

Enclosure



3247

16

NOD Comments on the Voluntary Corrective Action Completion Report for PRS 1-003(d) and the Paint Spill Investigation

CAN DUMP SITE

General Comment: The Can Dump site may be a good candidate for a no further action determination; however, LANL has failed to provide the site characterization and waste sampling data necessary to merit a no further action determination. LANL needs to recognize that the VCA plans were submitted and implemented without regulatory review or approval. Referencing sampling results to another document is unacceptable in corrective action Reports. All pertinent sampling results for each SWMU must be included in each VCA/RFI Report.

Page 4; Section 2.0: LANL must include all sampling data that has been performed at each SWMU. This should include the all the sampling results from the RFI investigation. In addition, composite samples are not acceptable and will need to be re-sampled. Also, 0-6 inch sampling depths taken underneath the can site are unacceptable.

Page 4; Section 2.1.2: LANL mentions that antimony was detected in one soil sample at a concentration slightly above its screening action level. LANL will needed to take a deeper sample at this location. Also, LANL mentions that the SAL is based on a residential exposure scenario, which is more conservative than what LANL proposes (recreational hiker scenario). NMED requires that all sites be calculated to a residential risk assessment scenario.

Page 6; Confirmatory Sampling: Even though the cans have been removed does not mean that the Administrative Authority will grant a no further action determination. LANL must demonstrate that a sufficient (no of samples were taken at appropriate depths to adequately characterize this SWMU; and, from the limited amount of information presented in this Report, it appears that LANL did not adequately characterize this SWMU.

PAINT SPILL INVESTIGATION

General Comment: Although LANL did a reasonable of job determining the horizontal extent of contamination, the vertical extent of contamination has not been determined. Deeper vertical soil samples will be need to be taken at appropriate locations above UTL's, especially those locations above SAL.

In addition, EPA considers this site a SWMU and should be added to the HSWA permit separately from the "can dump site".

General Comment: LANL will need to include an ecological screening assessment in the revised Report. Furthermore, LANL will need to use the Integrated Exposure Uptake Biokinetics Model for determining the risk from the lead contamination. This information was omitted from the Report.

Page 6; Field Activities: Please provide a map of sampling locations 0101-95-0021 thru 0026. Also, please include the sampling depths.

Pages 8 and 9; Table 3.1.2-1 and 2: LANL needs to include the actual results for the "B" letters in the Tables. Also, for the "NDs", LANL should include the detection limit. For example, Chromium - ND(1ppm).

Page 10; 2nd paragraph: Please indicate the depths for samples 0101-95-0025 and 26.

Page 13; Confirmatory Sampling: Please indicate the depths for samples 0101-95-0029 thru 33.

Page 18; Table 3.3.2-3: Please include the sampling depths for samples 0101-95-0036 thru 58 in the revised Report.

Page 23; Evaluation of Organics: Please include all organic results in the revised Report.

Page 39; Table 3.3.2-12: For the RME Estimate Calculations, the Middle Area, LANL needs to include the additional noncarcinogens that were omitted earlier in the Report, on page 26. These constituents are: Vanadium, Zinc, Copper, and Cobalt.

Page A-2; Organic Analysis: LANL mentions "that the presence of acetone and methylene chloride were found in the method blanks and in the samples. However in all cases, the concentrations of these analytes found in the samples were less than ten times the amounts found in the blanks. Therefore, the detection limits were raised to the amounts found in the samples, and all sample values are considered nondetects". By what criterion is LANL using to make this determination?