



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

FEB 02 1998

*See -  
Review form  
to LAD/Doc by  
3/6/98  
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date as  
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3/6/98*

*HEAD LANT 1/1078/1*

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 TA-1 Aggregates N and P, Los Alamos National Laboratory  
(LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed  
LANL's RFI Report for TA-1, Aggregates N and P, dated August  
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,

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

Enclosure



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**NOD Comments on the RFI Report for TA-1, Aggregates N and P**

**General Comment on TA-1 Report:** The approved workplan by EPA required the investigation of 13 different locations along the Western Sanitary Waste Line. Please explain why six locations were not sampled, according to the approved workplan. If there is not a reasonable justification, EPA will require that all "missed locations" be sampled as originally required in the workplan.

**General Comment for TA-1 Report:** LANL needs to provide all completed soil boring logs and descriptions for each PRS. Also, LANL should include all field screening information (radiation, XRF, VOCs) on the logs (including the background readings) or include this information in a separate section of the revised RFI Report.

**General Comment on TA-1 Report:** EPA assumes that LANL sampled the soil underneath all manholes; however, in the report LANL mentions that grab soil samples were taken near the manholes. Please clarify in the revised Report what is meant by "near".

**PRSs 1-001(s,u)**

**General Comment on PRS 1-001(s,u), Locations 1A, 10, 11, and 13:** EPA disagrees with LANL's recommendations of No Further Action for locations 1A and 13 for PRS 1-001(s,u). However, for locations 10 and 11, if the requested information (see below comments) is acceptable, then EPA would tentatively agree to a NFA determination.

Also, for locations 1A and 13, EPA did not review the relevant risk assessment sections, since additional sampling will be needed at those locations.

**General Comment for Location 1A:** Please provide the SVOC soil results for the soils underneath the manholes and the SVOC results "inside the pipes" in the revised Report.

**General Comment for Location 1A:** Under the approved workplan, LANL was supposed to take two soil samples per location underneath the pipes in location 1A; however, LANL failed to do this. Please explain. Also, at this location, 4 pipe sections were found to be broke, why didn't LANL sample the soil underneath the broken pipe sections since a leak would have occurred at those sections?

**Page 43; Location 1A:** EPA approval of the workplan never approved of using composite soil samples from materials outside the pipe. Also, just because XRF samples were not received, does not mean

that you make decisions without this information. LANL must follow the approved workplan.

**Page 50; Fig. 5.1.4.3.-1:** This figure does not include the boreholes as mentioned on page 49, second paragraph. Please include them. Also, please include the analytical results in the revised report.

**Page 62; Fig. 5.1.5.2-1:** The Figure Key indicates outside pipe sampling locations. Are these locations underneath the pipe or to the side?

**Page 63; Table 5.1.5.2-2:** LANL needs to include the metal results for lead, silver, chromium, nickel, arsenic, barium, vanadium, beryllium.

**Page 65; Table 5.1.5.3-2:** From reviewing this Table, locations 47 and 50 will need deeper vertical samples taken. Also, LANL needs to include the remaining metal results for chromium, nickel, arsenic, barium, vanadium, and beryllium.

**PRSs 1-006(s) and 1-007(1)**

**General Comment on PRS 1-006(s) and 1-007(1):** EPA tentatively agrees with the no further action determination for 1-006(s). For PRS 1-007(1), if all the requested information is provided and the information is acceptable, then a NFA determination is likely.

**Page 138; Table 5.2.5-1:** LANL needs to provide all the results, not just the inorganic results above background. This should include the results from 1993 and 1996.