



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

cc-SD

December 12, 1997

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

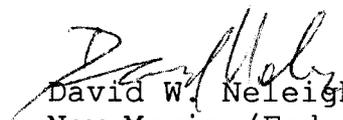
**RE: Review of LANL VCA Completion Report for the PRSs in TA 3,  
EPA I.D. No. NM0890010515**

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 cleanup activities in Technical Area (TA) 3, Potential Release Sites (PRSs) 3-003(p), 3-047(d), and 3-051(c), dated February 26, 1996. The EPA has found the report to be deficient and enclosed is a list of deficiencies.

If you have any questions or need additional information, please contact Allen T. Chang of my staff at (214) 665-7541.

Sincerely yours,

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

Enclosure



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**LIST OF DEFICIENCIES  
LANL VCA COMPLETION REPORT FOR TA 3**

**GENERAL COMMENTS**

1. For each PRS, LANL shall attach a section discussing data QA/QC. Please explain why several samples were analyzed at different detection limits and resulted in two different values. (**Best Professional Judgement, (BPJ)**)
2. LANL shall explain where the PRGs came from and how were they calculated. Why are some values an order of magnitude higher than their respective values found in EPA Region 6 Human Health Media-Specific Screening Levels, and EPA Region IX Preliminary Remediation Goals. (**BPJ**)

**SITE SPECIFIC COMMENTS**

PRS 03-003(p)

1. Page 1, 2nd paragraph: It states, "A RFI found levels of lead exceeding SAL at depths between 0-6 inches." What are the lead concentrations in the soil below 6 inches and at what depth does the lead concentrations drop below the background UTL? Please provide more details about the investigations and submit all RFI analytical results including organics and inorganics. When and how long had this site been used? (**BPJ**)
2. Page 1, CORRECTIVE ACTION: Please justify why "Field screening also eliminated the need for analysis of VOC, SVOC, and TPH". Please specify any evidences indicating that the above tests are unnecessary? (**BPJ**)
3. Page 4, TABLE 1: Please explain why the background UTL showed in this report, such as antimony (2.5 mg/kg) and lead (39 mg/kg), is higher than that found in other LANL RFI reports. If a site specific background UTL is used in this report, LANL shall explain the reason why they did not use area background UTL. (**BPJ**)
4. Page 5, TABLE 1: LANL shall explain how to get Total PCB 95% UCL of Mean (0.596). This value should be higher than the data points used to calculate the mean. (**BPJ**)

PRS 03-047(d)

5. Page 7: What are the COPCs from the screening results and at what levels? LANL shall submit all field screening results including detection levels, sample depth...etc. **(BPJ)**
6. Page 11, TABLE 2: Please explain why the background UTLs for lead and beryllium are 70% higher than that found in other LANL RFI Reports. **(BPJ)**
7. Throughout the report, Stoddard Solvent is discussed, however, the primary constituents of the solvent are not discussed. The name is not capitalized or identified as a Trademark name. LANL shall identify and discuss its compositions and properties. **(BPJ)**

PRS 03-051(c)

8. Page 15, 1st paragraph: It states, "Analysis for VOCs was eliminated because verification screening results indicated VOCs were not detected above their respective PRGs." LANL shall explain whether the results are also not detected above their respective detection limits. Please provide the verification screening results for further review.

Most of the VOCs do not occur in the background soil. If detected, it means a release did occur, LANL shall proceed characterizing the release. The verification screening results shall be used to serve this purpose and not to be used to determine whether or not the site needs to be remediated. **(BPJ)**

9. Page 16: LANL shall submit all previously-obtained site characterization data including verification screening results, CST-12 mobile laboratory results, and VCA data along with their detection limits and sampling depth. **(BPJ)**