



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

*3/11/98  
Please forward  
to LANL/DOE  
by 2/13/98 or send it  
to EPA by same date  
with attached  
copy  
1/12/98*

January 5, 1998

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 PRS 3-022,  
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 Site (PRS) 3-022, dated January 22, 1996.

EPA has found the Report to be deficient and recommends NMED HRMB delay the decision of No Further Action (NFA) request for PRS 3-022 until EPA reviews the requested information. An list of deficiencies is enclosed. 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



5538

*HSWA LANL 1/11/4/3*

*TL*

**LIST OF DEFICIENCIES**  
**LANL VCA COMPLETION REPORT FOR PRS 3-022**

GENERAL COMMENT

1. The New Mexico UST Regulations have promulgated TPH cleanup level of 100 ppm (Section 1209.D, Part 2[a]). LANL ER Project, "Draft Evaluation and Cleanup of TPH in Soil", drafted on March 28, 1995, also cited the above cleanup standard. LANL shall comply with 100 ppm, not 2600 ppm.

The EPA does not believe that the VCA of this site is complete based on the facts stated in this report. LANL shall submit a plan discussing re-investigation and cleanup of the TPH contamination, including areas that are within and beyond the boundary lines. The confirmatory samples should include samples from inside and outside the boundary at various depths. **(Best Professional Judgement, (BPJ))**

SITE SPECIFIC COMMENTS

1. Page 2, 2nd paragraph:
  - a. Please specify the actual size of this site.
  - b. Whenever the sample collection is mentioned in the VCA report, LANL should give the sample location ID (or FIMAD) in discussion, and show the sample location and ID on the map. For example, the locations of the four excavation guidance samples did not show up in Figure 1. If a date of sampling is mentioned in Table 2, it shall also be specified in the discussion. LANL should revise the report and make it more readable.
  - c. The TPH of the four corner samples ranged from 4,066 ppm to 18,637 ppm. This indicates that contamination has been spread outside the boundary of the sump. LANL shall sample these corners at 1-ft intervals until TPH is below 100 ppm. LANL shall delineate both horizontal and vertical contamination within and beyond the site boundary **(BPJ)**
2. Pages 2 and 3: At several places in the report, "Table 2" was misquoted as "Table 1". LANL shall correct that in the revised version. **(BPJ)**
3. Page 2, last paragraph: It states, "When this part of the excavation was complete, six verification samples were collected (Figure 1) and analyzed for TPH." Later, LANL referred the same sample group, in Table 2, as "1st Set Verification Samples". Please be consistent. **(BPJ)**

4. Page 3, first paragraph: The results from the test pit and trenches indicated that TPH concentrations varies with depths and locations; therefore, additional verification samples are necessary to ensure that the VCA is complete when the site has been fully investigated. **(BPJ)**
5. Page 3, 1st paragraph: It states, "Two additional trenches were dug on the east and west sides of the sump, and the corners sampled at one-foot intervals."
  - a. LANL should explain the purposes of digging two trenches and show their locations on the map.
  - b. Are the trenches located by the east and west boundary lines? If not, how far are they from the boundary lines? How long are the trenches?
  - c. LANL should explain whether "the corners" mean the four corners of the sump, or the ends of the trenches. Why did LANL dig two trenches and then only sample the ends of the trenches? What is the TPH at the trenches bottom other than the ends? **(BPJ)**
6. Page 6, Table 2: The sample number 219 at 4.2 feet has a concentration of 82,658 ppm of total petroleum hydrocarbons (TPH). After removals, the second set of verification samples has 3,570 ppm TPH which is above the state standard (see EPA General Comment No. 1). Based upon the results, the full extent (vertical and horizontal) investigation plan of the oil contamination must be established. **(BPJ)**