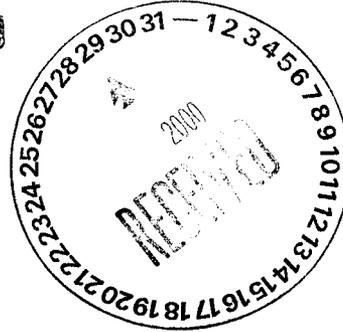




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
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NOV 22 2000



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Mr. Theodore Taylor
Program Manager
Department of Energy
Los Alamos Area Office, MS A316
Environmental Restoration Program
Los Alamos, NM 87544

HSWALANL 1/11/14/3-056(c)

RE: Comments on the Risk-Based Cleanup/Disposal Application under 40 CFR 761.61(c), for PCB Site 3-056(c) at Los Alamos National Laboratory (LANL)

Dear Mr. Taylor:

The Environmental Protection Agency (EPA) has reviewed LANL's Risk-Based Cleanup/Disposal Application for Site 3-056(c) under 40 CFR 761.61(c) and grants a conditional approval of the application. Specifically, EPA is approving the sampling characterization and verification portion and the temporary waste storage and offsite disposal portion of the application. Enclosed are the conditions that must be addressed in the Voluntary Corrective Action (VCA) Report in order to satisfy the requirements of the risk assessment portion of the application. Please be aware that this determination is being made under the Toxic Substances Control Act and that LANL must satisfy the NMED for a RCRA determination of the site.

Also, please note that the conditional approval only applies if LANL is not able to meet the less than 1 ppm cleanup level approved by EPA in August of 1995. If LANL meets the less than 1 ppm cleanup level, then the conditions do not apply. However, EPA will still require submittal of a VCA Report, verifying that the cleanup level (less than 1 ppm) has been met. The VCA Report shall be submitted to EPA by July 1, 2001. Should you have any questions, please feel free to contact Mr. Rich Mayer at (214) 665-7442.

Sincerely,

Stephen A. Gilrein
Associate Director, RCRA

Enclosure

cc: James Bearzi, NMED
Julie Canepa, LANL



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Conditions on LANL's Risk-Based Cleanup/Disposal Application for PCB Site 3-056(c)

1. After cleanup is completed, LANL must submit a VCA report which includes a risk assessment based upon the site contamination left after remediation. The risk assessment should include/address the following items:
 - A. A discussion of the conceptual site model for the human receptor;
 - B. The exposure frequency (days per year) for a industrial worker at the site will be 15 days a year.
 - C. Follow the TSCA PCB guidance for risk assessments, providing information required on the risk assessment review template;
 - D. Determine the risk of contaminants left in place; and,
 - E. A discussion on how the pathways for ecological receptors have been eliminated.
2. The VCA Report must be submitted to EPA by July 1, 2001.
3. The sampling of bulk PCB remediation waste (for waste classification purposes) must comply with requirements of 40 CFR 761.265.