



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

NOV 22 2000



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Mr. James Bearzi, Chief
Hazardous and Radioactive
Materials Bureau
New Mexico Environment Department
2044A Galisteo Street
Santa Fe, NM 87505

Re: Comments on the Addendum to the RFI Report for SWMU 3-010(a), ER:2000-0553, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Bearzi:

The Environmental Protection Agency (EPA) has reviewed LANL's Addendum to the RFI Report for SWMU 3-010(a) dated October 12, 2000, and has found the Addendum to be deficient. Enclosed are our comments pertaining to the Addendum.

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

Sincerely,

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

Enclosure

HSWA LANL 1/11/14/3-010(a)

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Comments on the Addendum to the RFI Report for SWMU 3-010(a)

General Comment: EPA does not agree with LANL's recommendation of No Further Action for this SWMU. The addendum still leaves questions and doubts about the hydrogeology of this site and whether the source for the groundwater contamination has been completely delineated and removed. EPA would like to see the following issues addressed:

1. The areal extent of the artificial fill/groundwater where MW-1 is located and the groundwater flow direction. This information should be included on a map. The map should also include the location of the other two boreholes which water was found and whether these boreholes have also been sampled and monitored;
2. Is there a vertical connection of the "artificial fill" groundwater with deeper zones or is this groundwater bounded vertically? No conclusive information or evidence was presented in the addendum; and,
3. The source of the groundwater contamination at MW-1. It appears to EPA that there must be additional contaminated soils/source areas in order for MW-1 to be contaminated, since the well is located "uphill" and up gradient hydraulically from the source area that was excavated.

Even if the above issues are addressed to the satisfaction of NMED/EPA, LANL would still need to perform periodic groundwater monitoring and re-routing of roof and surface water drainage.