



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

JAN 29 2002



Mr. James Bearzi, Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Dr. East, Bldg. 1  
Santa Fe, NM 87505-6303

Re: Comments on LANL's Response to the Request for Supplemental Information for the RFI Report Addendum for SWMU 3-010(a)

Dear Mr. Bearzi:

The Environmental Protection Agency (EPA) has reviewed the above mentioned document pertaining to Site 3-010(a), dated December 19, 2001, and offers the enclosed comments for your review. Should you have any questions regarding the comments, please feel free to contact Mr. Rich Mayer at (214) 665-7442.

Sincerely,

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

Enclosure



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## **Comments on the RSI for the RFI Report Addendum for Site 3-010(a)**

**LANL Response No. 1:** From reviewing LANL's response, it still appears that they are "stalling" on this site. It appears that LANL wants this site to "go away". Performing a geophysical survey is acceptable; however, one should realize that the results could be ambiguous and subject to interpretation.

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. If this is not the case, then LANL needs to logically explain the pathways which resulted in MW-1 being contaminated from SWMU 3-010(a). Since the well was first sampled 1996, nothing has been done at the site, other than rhetoric from LANL saying that the saturated zone is thin, shallow, and of small areal extent. This may be the case, however; LANL has failed to make this case to the regulatory agencies. Sound technical evidence/documentation is needed to make a sound decision, not speculation.

Proposed regional well R-17, in general, will not provide the necessary information to determine whether contamination from the shallow zone has reached the regional aquifer. The proposed well is almost a mile away. If the same contaminants in MW-1 are found in R-17, it would be difficult to conclude that the contaminants came exclusively from SWMU 3-010(a). In summary, the phased investigation in collaboration with NMED will determine whether a deeper well is needed near SWMU 3-010(a).

As far as the monitoring goes, LANL should at a minimum, monitor MW-1 annually. Also, sampling of the well does not need to be delayed until after the geophysical results are received. LANL has sampled this well only once (in 1996) on their own accord. It should be noted, that in the RSI response, LANL did not want to perform any monitoring until after the geophysical results.

**LANL Response No. 2:** The response is acceptable if the Cs-137 numbers are actually within the range of background as LANL states.

**LANL Response No. 3:** The response is acceptable.