

MSwA LANL FU-5/1111 & 5/1157



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

APR 24 1998

*Sta -
Please forward to
LANL/DOE by 5/29/98
OR Rescind to EPA by
same date with
National Agents
4/30/98*

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

Re: NOD Comments on the RCRA Facility Investigation Report (RFI)
for TAs 6, 8, 22, and 40 Los Alamos National Laboratory
(LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed LANL's RFI Report for TAs 1, 8, 22, and 40, dated September 1997, and has found the Report to be deficient. Enclosed are the deficiencies for your review.

Should you have any questions, 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



2922

TC

NOD Comments on the RFI Report for TAs 6, 8, 22, and 40

This RFI Report includes the following PRSs: 8-002; 7-001(a-d); 6-003(a,c,f,g); 6-008; C-6-019; 6-001(a,b); 22-016; 22-010(a,b); 40-005; 22-014(a,b); and 6-007(g). A total of 20 PRSs.

General Comment: Please provide all field screening results (VOCs) and soil logging/descriptions for each PRS.

Appendix B, Data Quality Tables: For each of the following Sample ID's please indicate the number of days missed over the required holding time: AAA8861; AAA8862; AAA8863; AAA8864; AAA8865; AAA8866; AAA8867; AAA8868 AAA8869; AAA8870; AAA8871; AAA8872; AAA8873; AAA8874; AAA8875; AAA8875; AAA88776; AAA8877; AAA8878; AAA8879; AAB7859; AAB7878; AAB7883; AAB7933; AAA8945; and AAA8970.

Also, the following samples were rejected: 0522-97-0006; AAA8648; AAA8650; AAA8656; AAA8687; AAA8693; AAA8694. Please clarify whether these samples were resampled and analyzed.

In addition; there were 21 Sample ID's that were lost and never analyzed. Please clarify whether these samples were resampled and analyzed.

PRS 08-002

Page 54; Table 5.1.5-1: EPA questions why LANL provided the lead sampling results, in which many of the locations sampled were below the background screening values for lead (23.3 mg/kg), but did not provide the results for copper and beryllium. Please provide the copper and beryllium results.

Page 55; Conclusions and Recommendations: EPA will require that a deeper sample be taken at sample location 08-2001 (lead at 420 mg/kg at 0-3.6 ft.) from 5- 5.5 feet. If that sample shows no contamination above background UTL, then EPA can tentatively agree to a NFA for this PRS, since only 1 surface sample out of 20 taken exceeded UTLs for lead.

PRS 7-001(a)

General Comment: Please provide all the inorganic, semivolatile, and high explosives results in the revised report.

Page 60; Figure 5.2.5-1: Please provide the Sample ID numbers for

the three sampling locations not numbered.

Page 64; Conclusions and Recommendations: Regardless of what the requested information from EPA indicates, EPA will require a deeper sample at location AAB7916 due to barium found at 604 mg/kg at 2-3 feet.

PRS 7-001 (b)

General Comment: Please provide all the inorganic, semivolatile, and high explosives results in the revised report.

Page 67; Figure 5.3.5-1: Please provide the Sample ID number for the most southern sampling location.

Page 71; Conclusions and Recommendations: Regardless of what the requested information from EPA indicates, EPA will require deeper samples at locations AAB7925 and AAB7927 due to elevated concentrations of copper, lead, cadmium and zinc at the 2-3 foot depth interval.

PRS 7-001 (c)

General Comment: Please provide all the inorganic and high explosives results in the revised report.

Conclusions and Recommendations: EPA will require a deeper soil sample (lead found at 96.5 mg/kg at .5 ft.) be taken at 3 feet at sample location AAB7935.

PRS 7-001 (d)

General Comment: Please provide all the inorganic and high explosives results in the revised report.

Page 81; Conclusions and Recommendations: If all the requested information is submitted and is determined to be protective of human health and the environment, then EPA can agree with a no further action determination for this PRS.

PRS 6-003 (c)

General Comment: Please provide all the inorganic and high explosives results in the revised report.

Page 90; Conclusions and Recommendations: EPA will require deeper samples at locations AAB7858 and AAB7861. Preferable sampling

depths are 5 feet.

PRS 6-003(f)

General Comment: Please provide all the inorganic and high explosives results in the revised report.

Page 98; Conclusions and Recommendations: EPA will require a deeper sample at location AAB7865 due to elevated levels of lead, and thallium. Preferable sampling depth is 4 feet.

PRS 6-003(g)

General Comment: Please provide all the organic, inorganic and high explosives results in the revised report.

Page 105; Table 5.8.5-1: Please explain why LANL took sample AAB7884D if they were not going to analyze it?

Page 98; Conclusions and Recommendations: EPA will require a deeper sample at location AAB7878 at 5 feet, due to tetryl being found in the 2-3 foot sample at 18 mg/kg. LANL will need to perform an eco risk assessment also, since two surface locations exceeded SALS for copper and lead.

PRSs 6-003(a), 6-008, and C-6-019

General Comment: Please provide all the inorganic and high explosives results in the revised report.

Page 128; Conclusions and Recommendations: EPA will require deeper samples at locations AAB7843 and AAB7845 due to barium at 630 and 653 mg/kg.

PRS 6-001(a)

General Comment: Please provide all the inorganics and organic results in the revised report.

General Comment: EPA is not satisfied with the outfall sampling performed at this SWMU. Firstly, LANL mentions that the PRS contains organic wastes but does not sample the outfall areas for VOCs. Secondly, soil sampling depths to only 1.5 feet from a PRS that discharged liquid wastes is also unacceptable. EPA will require deeper sampling at the three outfall sampling locations, at 3-3.5 feet with VOCs being analyzed also.

PRS 6-001 (b)

General Comment: Please provide all the inorganics and organic results in the revised report.

General Comment: EPA is not satisfied with the outfall sampling and trench sampling performed at this SWMU. Firstly, LANL mentions that the PRS contains organic wastes but does not sample the outfall areas for VOCs. Secondly, soil sampling depths to only 1.5 feet from a PRS that discharged liquid wastes is also unacceptable. EPA will require deeper sampling at the outfall sampling locations, at 3-3.5 feet with VOCs to be analyzed also. Also, EPA will require 3 foot samples at the filter trench area with VOCs being analyzed.

Page 145; Table 5.11.5-1: This table did not include the tank content results. Please provide them in the revised report.

PRS 22-010 (a)

General Comment: Please provide all the organic, inorganic and high explosives results in the revised report.

Page 150; Field Investigation, 6th paragraph: The leach field sample locations are not located on Figure 5.12.-1. Please provide them.

PRS 22-010 (b)

General Comment: EPA is not satisfied with the outfall and trench sampling performed at this SWMU. Firstly, LANL mentions that the PRS contains organic wastes but does not sample the inactive outfall area and the sand filter and runoff area for VOCs. Secondly, soil sampling depths to only 1.5 feet from a PRS that discharged liquid wastes is also unacceptable. EPA will require deeper sampling at these areas and will require samples from 3-3.5 feet and LANL must analyze the samples for volatiles.

General Comment: Please provide all the organic, inorganic and high explosives results in the revised report.

General Comment: Please provide a map that identifies all sampling locations and their ID numbers.

General Comment: EPA will require that a deeper sample be taken

at Sample ID AAA8956 due to lead being found at 244 mg/kg at the 9-10 foot interval.

PRS 40-005

General Comment: Please provide all the organic and high explosives results in the revised report.

General Comment: EPA is not satisfied with the outfall sampling performed at this PRS. Firstly, LANL mentions that the PRS contains organic wastes but does not sample the outfall area for VOCs. Secondly, soil sampling depths to only .5 feet from a PRS that discharged liquid wastes is also unacceptable. EPA will require deeper sampling at these areas and will require samples from 3-3.5 feet and must analyze the samples for volatiles.

Page 179; Table 5.14-1: EPA will require LANL to resample the marsh soil samples that were lost.

PRS 22-014 (a)

Page 184; History: Is the sump and the basin the same structure? Also, how deep is the dry well?

General Comment: Please provide all high explosives results in the revised report.

PRS 22-014 (b)

General Comment: Please provide all the organic, inorganic and high explosives results in the revised report.

General Comment: EPA will require that outfall soil sampling locations have deeper vertical samples taken, from 3-3.5 feet, with volatiles being analyzed. Also, deeper vertical samples need to be taken at the sump area at locations AAA8689, AAA8687, and AAA8693.

PRS 6-0007 (g)

General Comment: Please provide all the organic, inorganic and high explosives results in the revised report.

Conclusions and Recommendations: If all the information requested by EPA is determined to be protective of human health and the environment, then this PRS should meet the NFA criteria.