



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

*John K
Please see me
on Thursday*

September 24, 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 the LANL Response to RSI for VCA Completion Report
for PRS 06-007(f), EPA I.D. No. NM0890010515**

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a technical review of the Los Alamos National Laboratory (LANL) RCRA Response to Request for Supplemental Information (RSI) on the Voluntary Corrective Action (VCA) Completion Report for cleanup activities in Technical Area (TA) 6, Potential Release Site (PRS) 06-007(f), dated September 10, 1998. The EPA has found part of the Response to be deficient (see Enclosure).

Since parts of the comments in the RSI were raised by the NMED DOE Oversight Bureau, the EPA recommends that the Bureau review this document and determine whether their concerns have been fully addressed.

If you have any questions or need additional information, please contact Mr. Allen T. Chang of my staff at (214) 665-7541.

Sincerely yours,

for

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

Enclosure



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**REVIEW COMMENT ON LANL'S RESPONSE TO RSI ON
A COMPLETION REPORT FOR PRS 6-007(f)**

1. EPA's Comment on the LANL Response to RSI No. 1

In Table 2, 06-007(f) VCA Confirmatory Soil Sample Results, the lab qualifier for most of the data is "UJ", however, the detection limits (DLs) for some organic compounds were found 100 to 1000 times higher than their respective SAL. Below are some examples of this point:

ANALYTE (mg/kg)	RESULT	DL	SAL	DL/SAL
Aldrin	3.25	3.25	0.026	125
Nitrosodimethylamine[N]	3.25	3.25	0.0087	374
Benzidine	16.2	16.2	0.0019	8,526

This analysis may not be useful with such a high DL. Contamination could exist at the concentrations below the stated DL but still higher than their respective SALs. Comparing the DLs used in Table 2 and Table 3, PRS 06-007(f), OC Data, it seems most DLs for the organic compounds in Table 2 are 10 to 50 times higher than those used in Table 3. LANL should explain why the DLs used in those two tables are different.