



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

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Sei -

OCT 29 1996

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

RE: Technical Review of the Los Alamos National Laboratory (LANL) RFI Report for Potential Release Sites (PRSS) in Technical Areas (TAs) 8 and 9, 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 Facility Investigation (RFI) Report (issued 3/15/96) for Potential Release Sites (PRSS) located in Technical Areas 8 and 9. The Report has been determined to be deficient. Enclosed is the Notice of Deficiency. The EPA recommends that LANL be allowed sixty days to respond.

Based upon the sampling and analytical results presented in the Report, EPA recommends that thirteen (13) sites be removed (see enclosure) from the LANL HSWA permit and that a Class 3 permit modification be initiated. However, EPA recommends that deeper sampling be performed at site AOC-8-010.

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

Sincerely yours,

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

Enclosure

FILE LANL HSWA 5/1157/8
5/1157/9

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REVIEW SUMMARY

This RFI Report includes information on the following PRSs:

8-004(d), 9-005(a), 9-005(d), 9-009, 8-009(d), 8-009(e),
9-001(a), 9-001(b), 9-001(d), 9-003(g), 9-003(h), 9-003(i),
9-001(d), and C-8-010.

Based upon the information provided, the proposals have been grouped as follows:

Sites Where No Further Action (NFA) Appears Appropriate

Based upon the information provided, EPA tentatively agrees with the NFA proposals for the following sites:

PRSs 8-004(d), 9-005(a), 9-005(d), 9-009, 8-009(d),
8-009(e), 9-001(a), 9-001(b), 9-001(d), 9-003(g), 9-003(h),
9-003(i), and 9-001(d).

Site Where Additional Information is Needed

Subject to the receipt and review of an additional investigation, the following site may be reconsidered for NFA:

AOC-8-010

**NOTICE OF DEFICIENCY
LANL RFI Report for PRSs in
Technical Areas (TAs) 8 and 9**

Site Specific Comments:

PRS C-8-10

Page 84, 1st Paragraph: The two samples AAB0888 and AAB0890 were taken at depths of 0.67 - 1 ft and 0.75 - 1.25 ft for VOC analysis and SVOC analysis respectively. However, according to the LANL's Response to EPA Notice of Deficiency for Operable Unit 1157, LANL agreed to sample to a depth of 24 inches, not at the above mentioned depth. LANL shall re-sample this site at the depth stated in EPA approved work plan. **(Best Professional Judgement)**