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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

INOV 2 8 1995

Mr. Theodore J. Taylor Program Manager Department of Energy Los Alamos Area Office Los Alamos, NM 87544

Re: RFI Report for Technical Area 10, Notice of Deficiency Los Alamos National Laboratory (NM0890010515)

Dear Mr. Taylor:

The Environmental Protection Agency (EPA) has reviewed the RFI Report for Technical Area 10, Solid Waste Management Units (SWMUs) 10-001(a-d), and found it to be deficient. Enclosed is a list of deficiencies for which you have ninety (90) days from the date of this letter to respond.

Should you have any questions, please feel free to contact Ms. Barbara Driscoll at (214) 665-7441.

Sincerely,

David W. Neleigh, Chief New Mexico and Federal

Facilities Section

fill

Enclosure

cc: Mr. Benito Garcia New Mexico Environment Department Mr. Jorg Jansen Los Alamos National Laboratory, MS M992



List of Deficiencies RFI Report Technical Area 10 SWMUS 10-001 (a-d) Los Alamos National Laboratory

- 1. The grid size (500 foot intervals) used for sampling in Phase I may be appropriate for determining if there is gross contamination over a very large area but does not specifically address the firing pads for SWMUs 10-001 (a-d). EPA contends that an insufficient number of samples were collected to plausibly conclude that there is no human health risk at the site. LANL should sample the area around the firing pads using a statistically based or grid-based sampling plan for Phase II which will support a risk assessment.
- 2. Figure 1-3 somewhat alludes to the location of SWMUs 10-001 (a-d); although, SWMU 10-001(a) is mislabeled. LANL should provide a figure which clearly delineates in detail the location of each SWMU. In addition, the location of the SWMUs should also be labeled on each of the sampling figures.
- 3. The calculation of the upper tolerance limits should be revised to reflect 95 percent coverage of the 95 percent confidence interval.