

TA-10

December 16, 1996

Mat Johansen, DOE AIP POC
U. S. Department of Energy
Los Alamos Area Office, MS A316
Los Alamos, NM 87544

RE: Review of "RFI Report for Potential Release Sites, [10-002(a-b), 10-003(a-o), 10-004(a-b), 10-005, and 10-007], Los Alamos National Laboratory, April 1996," LA-UR-96-1284.

Dear Mr. Johansen:

The DOE Oversight Bureau (DOE OB) has reviewed the subject document. The following comments are provided for the purpose of communicating the results of the review. They are not provided or intended for the purpose of representing the regulatory position of the New Mexico Environment Department (NMED).

General Comments:

1. This report does not include an assessment of ecological risk. An evaluation of risk to ecological receptors should be assessed before sites are proposed for No Further Action.
2. This report does not include the discussion and results for the investigation of radiological constituents. The addendum described in the Executive Summary should be provided in this report before the site is proposed for No Further Action.
3. The potential for human health or ecological risk due to additive inputs from multiple nearby sources should be considered. That is, many sites within TA-10 (Bayo Canyon) may present carcinogenic, noncarcinogenic, or radiological risks which, in total, may present an unacceptable human health or ecological risk. Consideration should be given to whether additive effects will be sufficiently evaluated either within an ecological risk assessment or within the Watershed Management Plan, or by some other means.



4. It is not clear which screening action levels (SALs) LANL used (residential, industrial, or recreational) for the multiple chemical evaluation (MCE) presented in this report. However, it is our understanding that the NMED Hazardous and Radioactive Materials Bureau has requested that risk be calculated or MCE be presented using a residential scenario as well as the "most likely exposure scenario". However, if the MCEs provided are based on residential SALs then there is no need to present an evaluation based on any other scenario.
5. LANL should not use field instrumentation to determine the types of analyses to be conducted. When field instrumentation is used for screening, LANL should provide the detection limits of the screening instruments.
6. LANL's laboratory consistently exceeds holding times for HE samples. LANL should resample these sites to obtain useable data.
7. The report clearly presents and discusses the data in the text. However, for quicker review it may help to combine data for each PRS into a tabular format to supplement the text. Please see attached example tables.

Specific comments:

8. **Page 7, 1.3.4 Drilling and Subsurface Sampling,**
This section discusses field screening, collection of mobile laboratory analytical data, and samples collected for laboratory analysis. This section should state the number or percentage of media samples from each PRS that were analyzed by a fixed laboratory. It is our understanding that the NMED Hazardous and Radioactive Materials Bureau requires 20% of the samples collected for fixed laboratory analysis be analyzed by an off-site laboratory.
9. **Page 10, Figure 2.2.1-1 Generalized Topography of TA-10;**
Is TA-10 a restricted access area? If so, according to the figure, the three-sided temporary fence does not appear to provide adequate control to limit recreational use. See also; **Page 1, 1.1 General Site History, Paragraph 3;**
"Portions of Bayo Canyon are currently open to the public for recreational use."
10. **Page 15, 2.3.2 Ground Water;**

LANL should include in the ground water discussion a map showing TA-10 and the location of the nearest main aquifer, perched aquifer, and alluvial aquifer wells.

11. Page 18, 3.2 Background Comparisons

Although the report states that background values are from reports by Longmire and Purtyman, at each site it is not clear which UTL (soil, tuff etc...) was used for comparison. If there is any question, it should be clarified. Tables may help clarify comparisons to background and SALs. See general comment 7.

12. Page 23, 3.4.1 Screening Assessment; "The purpose of this decision step is to determine if chemicals should be retained as COPCs or eliminated from further consideration based on comparisons with screening action levels (SALs)"

LANL should specify which SALs were used in this report: residential, industrial, or recreational. See general comment 4.

13. Page 43, Paragraph 3, "Fifty percent of the total number of samples collected at PRS 10-002a and sent to the fixed laboratory for analysis were to be analyzed for high explosives. In addition, the US EPA Region VI approval of the notice of deficiency (NOD) response for the RFI work plan stipulated that samples must be collected for VOC analysis regardless of field screening results."

LANL should follow the RFI work plan and NOD. Additional samples should be taken and analyzed for VOCs and HE at PRS 10-002(a) at approximately the sample locations shown on Figure 5.1.4.1.

14. Page 50, Figure 5.2.4-1 Locations of PRS 10-002b samples and detected organic analytes.

LANL should show the exact location of the solid waste disposal pit. From the map and arrow it seems as if the pit was within the former fence boundaries. If this is correct LANL should explain why the second sample array is not centered on this area. Additional samples may be needed at this location.

15. Page 51, Paragraph 4; "The US EPA Region VI approval of the NOD Response for the RFI Work Plan for OU 1079 stipulated that samples must be collected for VOC analysis regardless of field screening results."

LANL should follow the NOD requirements. Additional samples

should be taken and analyzed for VOCs at PRS 10-002(b) at approximately the sample locations shown on Figure 5.2.4.1.

16. Page 62, Figure 5.3.4-1 Locations of samples collected at PRSs 10-003(a-o) and 10-007,...

It is difficult to evaluate the placement of the sample arrays without each PRS location shown. LANL should include additional maps that show each sample array location and each PRS associated with it. Each former drain line, pipe, manhole, pit, and tank location should be shown on a map and labeled a through o. Operable Unit 1079, RFI Work Plan, Page 1-6 has the only site map which shows the locations of each PRS within 10-003. However, the scale of this map is too small to be useful in locating the PRSs.

16. Page 73, Table 5.3.4-2, Field Screening Results for Volatile organic vapors and radioactivity at PRSs 10-003(a-o) and 10-007.

The results for sample 1294 and 1295 should be added to this table.

17. Page 73, ParagrapUBenito Garcia, N ED, Chief HR B

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