



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

zta

MAY 19 1997



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

Re: TA-10 RFI Report, NOD comments, Los Alamos National Laboratory
(LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed LANL's RFI Report for TA-10, dated April 18, 1996, and has determined the Report to be deficient. Enclosed are a list of 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



3402

16

NOD Comments on TA-10 RFI Report

General Comment: EPA did not review the risk/screening assessment sections of the RFI report corresponding to each SWMU. When LANL provides the additional information/data requested by EPA and performs the investigation according to the workplan, then a review of the risk assessment sections will occur. Also, EPA recommends that LANL include a ecological risk assessment section in this and in future reports; otherwise, EPA can not approve a no further action decision, unless the site is obviously clean and the background numbers are determined to be reasonable. BPJ.

General Comment #2: Although there are several tables in the RFI Report containing laboratory analytical results, the way the information is presented is very awkward to review and most of the analytical information is missing. For each SWMU, please include the following:

A table which includes all laboratory analytical results, not just the results that are above SALs or background levels. The table should include the sampling interval (depth), the analytical method, the detection limit, the UTLs, background concentrations for applicable constituents, and the SALs. BPJ.

General Comment: In the revised RFI Report, please include the soil descriptions for each soil boring at each SWMU, which should include any noted visual or olfactory contamination and all PID/FID readings taken. Please include the background readings for the PID/FID instrument. BPJ.

General Comment: From reviewing this report, LANL has some serious problems with their QA/QC program pertaining to the analytical laboratories used. There were numerous analytical requests that exceeded holding times by 30 days to 2 months. Also, there were numerous requests in which some of the constituents analyzed had poor recovery percentages and were therefore rejected. LANL must provide data of sufficient quality; otherwise, resampling will occur. BPJ.

Page 24; Section 4.0: LANL mentions in the analysis sections the recovery percentages for a specific constituent in a sample request number, please include the acceptable ranges for a particular constituent. For example, requests 18581 and 18583, aluminum, chromium, iron, magnesium, lead, thallium, and vanadium are qualified J or UJ for low recoveries (30-75%) in the QC sample. What are the acceptable ranges for these constituents?

Also, there are numerous mercury analysis requests (34) which missed the holding times from 30 days to 2 months that will have to be resampled in order to obtain quality data.

Under explosives, 19 analytical requests were missed, resampling

will be required to obtain acceptable data for those constituents.

In addition, the following analytical sample requests will need to be resampled: 19570; 18100; 181449; 18362; 20010. BPJ.

Page 29; 6th paragraph: The approved workplan indicates that SW 6010 will be used to analyze metals in soil samples. LANL mentions that most of the data produced used the correct method; however, LANL infers in this paragraph that another method is the correct method. Please clarify. BPJ.

Page 41; Field Investigation: What was the purpose of sampling at 3-3.9 feet interval in borehole 10-1250 if the waste in the pit was excavated to a depth of 15 feet and then filled with clean soil? BPJ.

Page 43; last paragraph: The approved workplan required that 50 % of the samples collected at PRS 10-002(a) be analyzed for high explosives and that all the samples be analyzed for volatile organics. Since LANL deviated from the workplan without approval from EPA, EPA will require LANL to redrill the five borings and analyze the samples for the appropriate constituents as required in the approved workplan from EPA (May 6, 1993). BPJ.

Page 47; Section 5.1.10: EPA disagrees with LANL's no further action recommendation since LANL did not follow the EPA approved sampling plan by failing to analyze for the appropriate constituents. Also, there is missing data/information that needs to be provided in the revised report before a final decision can be made. BPJ.

Page 49; 4th paragraph: It still appears that the array moved to the east did not hit the center of the waste unit. From the difficulties that LANL had finding the actual location of the unit, EPA questions if LANL knows the actual location of the unit? BPJ.

Page 51; 4th paragraph: Since LANL deviated from the workplan without approval from EPA, EPA will require LANL to redrill the borings and analyze the samples for the appropriate constituents as required in the workplan from EPA's approval letter dated May 6, 1993. BPJ.

Page 52; last paragraph: Why didn't LANL put borehole 10-1292 in the center of the waste unit? BPJ.

Page 59; Conclusions and Recommendations: EPA disagrees with LANL's recommendations because LANL did not follow the workplan and has not submitted all the data to EPA for review. BPJ.

Page 61; 3rd paragraph: Since LANL deviated from the workplan without approval from EPA, EPA will require LANL to redrill the borings and analyze the samples for the appropriate constituents

as required in the workplan in EPA's approval modification letter. BPJ.

Page 62; Fig. 5.3.4-1: Please include or label where each SWMU is on the map. Some of the units are located but others are not. Please revise. Also, why did LANL not drill a boring directly into the liquid waste pits and the septic fields? Is it because LANL does not know the exact location of these units? BPJ.

Page 73; last paragraph: Since LANL deviated from the workplan without approval from EPA, EPA will require LANL to redrill the borings and analyze the samples for the appropriate constituents as required in the workplan from EPA's approval letter, May 6, 1993. BPJ.

Page 80; Conclusions and Recommendations: EPA disagrees with LANL's recommendations because LANL did not follow the workplan and has not submitted all the data to EPA for review. BPJ.

Page 83; 2nd paragraph: Please include the PID readings. BPJ.

Page 90; Conclusions and Recommendations: EPA disagrees with LANL's recommendations because LANL has not submitted all the data to EPA for review. BPJ.

Page 92; Fig. 5.5.4-1: Please indicate on the map where the leach field was located. Also, why was a boring not taken underneath the tank, as was the case with the septic tank? BPJ.

Page 93; last paragraph: Since LANL deviated from the workplan without approval from EPA, EPA will require LANL to redrill the borings and analyze the samples for the appropriate constituents as required in the workplan from EPA's approval letter. BPJ.

Page 97; Conclusions and Recommendations: EPA disagrees with LANL's recommendations because LANL did not follow the workplan and has not submitted all the data to EPA for review. BPJ.

Page 103; Conclusions and Recommendations: EPA disagrees with LANL's recommendations because LANL has not submitted all the data to EPA for review. See general comment #2. BPJ.