



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

*File -
pls forward copy
LANL/008
11/21/97 or 10
received
6/18 w/ revision
by some party*

NOV 21 1997

1/1679/16

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

Re: NOD Comments on the RCRA Facility Investigation Report (RFI)
for PRS 10-008, Los Alamos National Laboratory (LANL), EPA
I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed
LANL's RFI Report for PRS 10-008, dated September 1997, and has
found the Report to be deficient. Enclosed are the 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, Chief
New Mexico and Federal
Facilities Section

Enclosure



3407

NOD Comments on the RFI Report for PRS 10-008

General Comment: LANL uses the logic that PRS 10-008 does not need to be sampled since it is near PRSs 10-001 (a-d). PRSs 10-001 (a-d) were sampled in 1994; therefore, those sample results can be used for PRS 10-008. LANL proposes a no further action recommendation for 10-008. EPA cannot approve a NFA determination on this site for the following reasons:

1. The RFI Report for PRSs 10-001 (a-d) has never been approved. In fact, two separate NOD letters have been issued. EPA issued an NOD letter to LANL on November 28, 1995. EPA also issued a letter to NMED recommending a 2nd NOD letter be issued to LANL (June 20, 1996). NMED issued an NOD to LANL on 7/21/97. See EPA's attached NOD letters.
2. In EPA's NOD letters, EPA found that the investigation of PRSs 10-001 (a-d) used too large of a grid size (500 foot intervals) and that the investigation performed was not specific enough to determine a release from PRSs 10-001 (a-d). EPA recommended that LANL submit a Phase II RFI sampling plan. Since EPA recommended further sampling for PRSs 10-001 (a-d), EPA cannot agree with LANL's NFA for PRS 10-008.