



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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



MAR 03 1997

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

RE: Comments on LANL NOD Response of the LANL RCRA RFI Report for PRSs in Technical areas (TAs) -14 and -12/67, EPA I.D. No. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a review of Response to the NOD for Los Alamos National Laboratory (LANL) RCRA RFI Report for Potential Release Sites (PRSs) in Technical Areas 14 and 12/67, submitted by LANL on October 15, 1996. The EPA agrees with LANL's explanation on these comments raised in the NOD except Comment No. 3 on PRS 12-004(b). (See Site-Specific Comment Page).

Based on the Response, EPA recommends that six more sites not be added to the LANL RCRA/HSWA permit (see attached Updated Summary Page), and that the Class 3 permit modification not be initiated by LANL until all comments have been resolved.

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

Sincerely yours,


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

Enclosure



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Review Summary

RFI Report for Technical Areas 14 and 12/67 Los Alamos National Laboratory

Sites Where No Further Action (NFA) Appears Appropriate (5)
Based upon the information provided, EPA tentatively agrees with the NFA proposals for the following sites:

PRS 14-002(f), PRS 14-007, PRS 14-002(c), PRS 14-002(d), PRS 14-002(e)

Sites Where it is Appropriate Not To Add To LANL RCRA/HSWA Permit (20)

Based upon the information provided, EPA tentatively agrees the following sites are not potential SWMUs and do not need to be added to LANL RCRA/HSWA Permit:

AOC C-12-001, AOC C-12-002, AOC C-12-003, AOC C-12-005, AOC C-14-001, AOC C-14-002, AOC C-14-008, AOC C-14-004, AOC C-14-005, AOC C-14-006, AOC C-14-007, AOC C-14-009, PRS 14-004(c), Central Area Drainage, C-12-004, **PRS 12-004(a), PRS 14-006, AOC C-14-003, PRS 14-002(b) and Firing Pad Drainage***

Sites Where NFA Does Not Appear Appropriate (5)

Because these proposed sites are still active, NFA does not appear to be appropriate:

PRS 14-001(a), PRS 14-001(b), PRS 14-001(c), PRS 14-001(d), PRS 14-001(e)

Sites Where Additional Information is Needed (1)

Additional information or further investigation is required for the following sites:

PRS 12-004(b)

Sites Where VCA is Proposed or Being Undertaking (7)

Further information will need to be provided on these sites prior to a decision being finalized:

PRS 12-001(a), PRS 12-001(b), PRS 14-001(f), PRS 14-002(a), PRS 14-009, PRS 14-010, PRS 14-003

Sites Where Deferred Action is Proposed (4)

Deferred action is proposed as these sites are still active:

PRS 14-001(g), PRS 14-005, PRS 14-004(a), PRS 14-004(b)

* **Comments of these sites have been resolved.**

SITE-SPECIFIC COMMENTS

1. **Comment No. 3, PRS 12-004(b)**

Section 5.9.4.3, Page 5-25: Both samples were taken next to the aluminum pipe instead of in the pipe as specified in the Work Plan. Given that the site has no documented history, there is no knowledge of the depth of the pipe, and no knowledge of site activities, LANL shall explain the reason why they did not sample inside the pipe? (BPJ)

LANL RESPONSE: The approved work plan is internally inconsistent. Section 5.2.6.3 (Page 5-2-10) of the text states that one sample at 6 inches and one at the soil-tuff interface would be collected. Table 5-6 (Page 5-2-12) states that "soil in pipe" is to be sampled. In the field, the soil inside the pipe was screened for elevated radiation, and none was detected. The decision was made to sample outside the pipe, because this was the only way to sample at the soil-tuff interface. In addition, sampling outside the pipe determines whether a release has occurred, and sampling at the soil-tuff interface determines whether any mobilization of contaminants has occurred.

DISCUSSION: The EPA disagrees. LANL did conduct the investigation of the contaminant mobilization in the horizontal direction. However, LANL must delineate the possible contamination in vertical direction as well. In fact, there are three places in the approved work plan mentioned about the sampling in the pipe:

1. Page 5-2-7: The Work Plan stated, "...two samples will be taken from the center of the aluminum pipe, a surface soil sample (0-6 in) and a sample at the soil-tuff interface."
2. Page 5-2-10: The Work Plan stated, "Sampling at this SWMU will consist of the collection of one soil sample to a depth of 6 in. And at the soil-tuff interface."
3. Page 5-2-12, Table 5-6: The Work Plan stated the sample media is "soil in pipe".

Therefore, the Work Plan clearly stated that sampling would occur inside the pipe without any confusion as LANL stated in the Response to NOD. Before granting the site NFA, LANL must answer whether the site poses risk to human health and/or the environment (horizontally and vertically). LANL must re-sample the soil-tuff interface according to the Work Plan and remove the pipe.