

1.4.2.6.1.10.1.4

Everett -
Please prepare
memo to Jorg.
Ted



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

SEP 28 1995

Mr. Theodore J. Taylor
Program Manager
Department of Energy
Los Alamos National Laboratory
Los Alamos, NM 87544

Re: RFI Report Technical Areas 18 and 27
Los Alamos National Laboratory (NM 0890010515)

Dear Mr. Taylor:

The Environmental Protection Agency (EPA) has reviewed your RCRA Facility Investigation Report for Potential Release Sites in Technical Areas 18 and 27, and found it to be deficient. Enclosed is a list of deficiencies which you have 60 days to respond to.

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

Sincerely,

David W. Neleigh
David W. Neleigh, Chief
RCRA New Mexico - Federal
Facilities Section

Enclosures

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



1481



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

**List of Deficiencies
Los Alamos National Laboratory
Operable Unit 1093
Technical Areas 18 and 27**

General Comments:

1. EPA agrees that LANL may request a Class 3 permit modification for removal of the following units from the HSWA portion of the permit:
 - 27-003
 - 27-001
 - 18-007
 - 18-001(c)
2. 3.2.2 Soils, p. 3-4 - LANL should provide the locations and relevant information of any soil samples collected for the background database which were collected near the location of Technical Areas 18 and 27.
3. 3.6 Waste Criteria, p. 3-6 - Using the stated approach for TC screening levels is only acceptable for solid wastes/soils which contain no liquids.
4. 4.2.3 Evaluation of Results, p. 4-11 - EPA would prefer that the analytical results that are in question be included in the evaluation of results section for each SWMU, not in a different section several pages away.
5. Figure 4-8, p. 4-12 - Please include the sampling identification number for each sample point taken.
6. 4.4.3 Evaluation of Results, p. 4-30 - One electromagnetic anomaly was detected; however, LANL did not make a determination if material was actually buried at the location. LANL should have followed through to determine what the anomaly was whether or not LANL thought the anomaly was the actual guns they were looking for.
7. Appendix A - EPA will provide separate comments related to the background study. LANL should be aware that their approach used for calculating the upper tolerance limit was not acceptable to EPA.