



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
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DALLAS, TX 75202-2733

TA/8

JUN 20 1996

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

Re: **Review of Draft Expedited Cleanup Completion Reports  
Los Alamos National Laboratory (NM0890010515)**

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed three "draft" expedited cleanup completion reports provided to EPA as a courtesy by the Los Alamos National Laboratory (LANL). The EPA has several concerns related to these reports which may affect the final versions of these, as well as, other future reports. The following are a list of concerns:

1. In prior discussions with LANL, between NMED and EPA, LANL, indicated that they would have the completeness of all cleanups verified by an independent person knowledgeable in the remediation process. Any discrepancies between what should have occurred during remediation and the final remedy would be noted by this independent reviewer and "fixed" by the LANL Field Unit Leader. EPA is concerned that the "independent" person who is certifying that these cleanups are acceptable is Mr. David McInroy, who currently works for the Environmental Restoration program at LANL. This does not appear to be an independent review.
2. Complete analytical results are not in all the documents. All confirmatory results should be submitted even if they are non-detects. In particular, EPA is concerned about a comparison between a background well and a temporarily installed well at site 18-001(b). It does not appear that complete sampling data has been provided from the background well for critical constituents such as arsenic and beryllium, as well as other metals. A review of the data as it is presented indicates that a release has occurred to the shallow aquifer in Pajarito Canyon. All the data from the background well is needed in order to determine if a release has actually occurred or if these elements are higher than action levels naturally in the ground water.



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3. The reports should detail the actual costs for the remediations. Estimated costs were presented in the expedited cleanup plans, and the completion reports should detail actual costs for the projects.

The EPA is currently preparing a draft Statement of Basis for four sites which underwent expedited cleanups in 1995, and for which a Class 3 permit modification is currently being finalized. Several of the issues listed above will need to be resolved by the New Mexico Environment Department prior to a final decision being made for these sites.

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

Sincerely,

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