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October 21, 1997

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

RE: Review of LANL VCA Completion Report for PRS 19-002,  
EPA I.D. No. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a technical review of Los Alamos National Laboratory (LANL) RCRA Voluntary Corrective Action (VCA) Completion Report for cleanup activities in Technical Area (TA) 19, Potential Release Site (PRS) 19-002, dated February 12, 1996. The EPA has found the Report to be deficient and enclosed is a list of deficiencies.

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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LIST OF DEFICIENCIES  
LANL VCA COMPLETION REPORT FOR PRS 19-002

GENERAL COMMENT

1. This report was poorly prepared. Many pieces of important information were omitted from the report. LANL shall rewrite and resubmit the report including all the information requested. (Best Professional Judgement, (BPJ))
2. The NMED/EPA do not agree with LANL that the Voluntary Corrective Action (VCA) activity of this site is complete. LANL supposedly removed contaminated soil from this SWMU; however, nothing was mentioned in the introduction. Besides, the analytical results in VCA Completion Report do not support the No Further Action (NFA) request. (BPJ)
3. Please obtain the quality assurance and laboratory data. The report should describe how the QA/QC plan objectives were met. Were any of the samples diluted? Did the samples arrive at the laboratory in proper condition? (BPJ)

SITE SPECIFIC COMMENTS

1. Page 1, 2nd paragraph: It states, "...the actions taken at PRS 19-002 are presented in this report in lieu of preparing a separate RFI report." However, this report does not follow RFI report format. If this Report is taking the place of the RFI Report, LANL must provide the following information:
  1. A summary of all analytical results, not just those results above background or SALs;
  2. All soil boring logs and field screening results;
  3. A discussion of any deviation from the approved Work Plan;
  4. The depth that each analytical result was sampled from; and<sub>see</sub>
  5. A map which shows the SWMU, and all sampling points in and around the SWMU. Figures 1 and 2 were omitted from the Report. (BPJ)

*Corrected  
AR*

2. Page 1, SECTION 2.0: It states, "A third sample...from each of the three types of batteries found at the site...". Please explain the differences of the three types of batteries. The previous statement stated that all batteries found on the site were carbon-type batteries. ( see the 4th paragraph of SECTION 1.0) (BPJ)
3. Page 3, 3rd paragraph: Please explain what is "the first-order drainages" (BPJ)
4. Page 4, 4th paragraph: TCLP should not be used to determine whether a release has occurred, or the extent of contamination at the site. LANL shall use total metals.

LANL shall submit a sample map indicating all the sample locations and battery debris locations. LANL must sample the battery debris locations and its proximity for both surface, and underground at 1-ft interval up to 3 feet deep to ensure that no hazardous waste was left in place. If the soils are still contaminated, LANL must remove them. (BPJ)

5. Page 5, TABLE 1: The background UTL data in this table appear to be mixed up. Please explain why the UTLs of the inorganics vary from sample to sample, and why some site UTL values are several times higher than that of their area UTL values. The following UTLs either are not consistent from sample to sample and/or their values higher than their LANL UTLs:

SAMPLE NUMBER	ANALYTE	UTL (mg/kg)	LANL UTL (mg/kg)
0119-95-0030	Mercury	1030	
0119-95-0029	Mercury	15.7	
0119-95-0028	Mercury	0.1	
0119-95-0029	Lead	1030	23.3
0119-95-0030	Lead	39	
0119-95-0029	Selenium	101	
0119-95-0028	Selenium	1.7	
0119-95-0029	Copper	6180	
0119-95-0028	Copper	15.7	
0119-95-0030	Manganese	6180	
0119-95-0029	Manganese	5.11	
0119-95-0028	Manganese	1030	

SAMPLE NUMBER	ANALYTE	UTL (mg/kg)	LANL UTL (mg/kg)
0119-95-0030	Zinc	15.7	50.8
0119-95-0029	Zinc	39	
0119-95-0028	Zinc	101	
0119-95-0028	Cadmium	2.7	1.4
0119-95-0028	Arsenic	11.6	7.82
0119-95-0028	Nickel	26.7	15.2

6. Page 5, TABLE 1: Please explain why the UTLs for manganese (1030 and 6180 mg/kg) are higher than EPA Region IX published Preliminary Remedial Goals (PRG) of manganese for residential soil value (380 mg/kg). Please submit any documents, data, or calculations, which support the explanation. (BPJ)
7. Page 5, TABLE 1: The analytic results in the Table indicated that some inorganics are still higher than their respective background UTLs by one or two orders of magnitude. Because these samples were collected from 0 to 6 inches deep, one can see that contaminants still exist, which means that VCA did not remove all the contaminated soils. LANL must remove the contaminated soil and resample the proximity of those sample locations. (BPJ)
8. Page 6, TABLE 1 (CONTINUED) - In the row of Sample Number 0119-95-0030, three metals show SALs, UTLs, and analyte concentrations without printing their names. (BPJ)
9. Page 7, 4th paragraph: It states, "...the values were then compared to LANL SALs (see attached table, "Total Metals, 22 June 1995")." The table is omitted from the report. (BPJ)
10. Page 9; Corrective Action: LANL did not provide any confirmatory sampling data to show that the site was cleaned up. LANL needs to provide the analytical results and a map showing the sampling locations. (BPJ)
11. Page 9, Section 5.0 CONCLUSIONS: It states, "On the basis of analyses for VOCs, SVOCs, and metals, we conclude that no release of RCRA hazardous materials occurred at PRS 19-002 and the site should be removed from the HSWA list of solid waste management units." However, Table 1 listed several inorganics that exceeded their UTLs, and some of them even exceeded their residential risk base concentrations. LANL shall submit a work plan to clean up the contaminated soils. (BPJ)

12. Page 9, Section 5.0 CONCLUSIONS: It states, "See the attached Certificate of Completion from Garry Allen, Field Unit One Project Leader." The Certificate of Completion is not in the report. (BPJ)