LANL, 3/11/97, N/A
HQWA, LANL, FU-2/OU1100
ITAs 20, 53 72.

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

March 11, 1997

Mr. Theodore J. Taylor, Program Manager
Los Alamos Area Office
Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, New Mexico 87544

Mr. Jorg Jansen, Program Manager
Environment Restoration
Los Alamos National Laboratory
528 35th Street, Mail Stop A316
Los Alamos, New Mexico 87544

RE: Notice of Deficiency
RCRA Facility Investigation Report
Potential Release Sites in Technical Areas 20, 53, and 72
Los Alamos National Laboratory
NM0890010515

Dear Mr. Taylor and Mr. Jansen:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) has reviewed the RCRA Facility Investigation Report for Potential Release Sites in Technical Areas 20, 53, and 72, dated March 15, 1996, and referenced by EM/ER: 96-140 and found it to be deficient. LANL must respond to the deficiencies noted in the attachment within 30 days of the receipt of this letter.

Should you have any questions regarding this letter, please contact myself or Mr. John Kieling at (505) 827-1558.

Sincerely,

Benito J. Garcia, Chief
Hazardous and Radioactive Materials Bureau

BJG:jek

attachment

1632

cc: T. Davis, NMED HRMB
R. Dinwiddie, NMED HRMB
T. Glatzmaier, DDEES/ER, MS M992
G. Saums, NMED SWQB
M. Johansen, LAAO, MS A316
M. Leavitt, NMED GWQB
D. McInroy, EM/ER, MS M992
D. Neleigh, EPA, 6PD-N
J. Parker, NMED DOE OB
S. Yanicek, NMED DOE OB, MS J993
FILE: Reading and HSWA LANL FU-2/OU 1100/TAs-20, 53, & 72
TRACK: LANL, 2/25/97, N/A, DOE/LANL, HRMB/JEK, RE, FILE

Review Summary

This RFI Report dated March 15, 1996 includes information on the following SWMUs:

20-001(a, b and c), 20-002(a, b, c and d), 20-003(b and c), 20-004, 20-005, 72-001, 53-001(a, b, e, and g), 53-005, 53-008, 53-010, and 53-012(e).

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

PRS 20-004, Septic Tank TA-20-49 and Drain Line
PRS 20-005, Septic Tank TA-20-27

Sites Appears Appropriate Not To Add To LANL RCRA/HSWA Permit
The NMED/EPA tentatively agrees with the sites are not potential SWMUs and not to be added to LANL RCRA/HSWA Permit:

PRS 20-003(b), 20-mm Gun Firing Site
PRS 53-001(g), Waste Storage Shed TA-53-1031
PRS 72-001, Small Arms Firing Range

Sites Where Additional Information is Needed
Additional information or further investigation is required for the following sites:

PRS 20-001(a), Landfill Area 1
PRS 20-001(b), Landfill Area 2
PRS 20-002(a), Recovery Pit
PRS 20-002(b), Dumbo and Mount
PRS 20-002(c), Firing Site
PRS 53-001(a), Waste Accumulation at Building TA-53-2
PRS 53-001(b), Waste Accumulation at Building TA-53-2
PRS 53-001(e), Waste Accumulation at Building TA-53-25
PRS 53-012(e), Outfall

Sites Analysis Information are Unavailable at this time
The NMED/EPA did not review those sites because the facility would submit the test results of these sites later. No decision is being finalized:

PRS 20-001(c), Landfill Area 3
PRS 20-002(d), Firing Site
PRS 20-003(c), Navy Gun Site
PRS 53-005, Waste Oil Pit
PRS 53-008, Boneyard
PRS 53-010, Mineral Oil Storage Area

LIST OF DEFICIENCIES
LOS ALAMOS NATIONAL LABORATORY (LANL)
RFI REPORT FOR PRS TA-20, TA-53 AND TA-72

General Comments:

1.Sites which are listed on the HSWA permit, and for which LANL is proposing a Voluntary Corrective Action (VCA), should still have all the analytical results submitted. The VCA report may function as the equivalent of the RFI report, provided all the sampling and analytical data is submitted. Otherwise, LANL needs to provide the RFI data. (**Best Professional Judgement (BPJ)**)

2.The Report did not specify, whether LANL had conducted laboratory analysis for HE, which is required in the work plan for the following sites:

PRS 20-001(a,b,c), 20-002(a,b,c,d) (**BPJ**)

3.It is hard to understand the Sample Summary Table for each site. I cannot tell what the results for the HE or metals were. What is the meaning of 423, 444, 445, or 264...etc. The reviewer understands some of them are explained in Appendix B but not all. LANL shall explain the meaning of those numbers in the table at the footnotes. (**BPJ**)

4.LANL mentions in several places in the report that a HE spot test was performed on each sample that is sent offsite for laboratory analysis; no HE results are shown in the tables. (**BPJ**)

Site Specific Comments:

PRS 20-001(b), Landfill Area 2

1.Page 5-13, Table 5.2-1: The report mentions that soil samples were analyzed for inorganics; however, only silver is indicated on the Table. Were other inorganics analyzed for? (**BPJ**)

PRS 20-002(b), Dumbo and Mount

2.Page 5-26: There is a contradiction in the report on the radiation screening performed at this site. The results of field surveys showed that surface radiation was as much as six times the ambient radiation levels; however, the results of field screening showed no radioactivity above background. Were those two surveys at the same location or different locations? LANL must clarify this issue. (**BPJ**)

PRS 53-001(a), Waste Accumulation at Building TA-53-2

3.Page 5-47, Extent of contamination: The vertical extent of contamination needs to be determined on sample 0253-95-0004, which had 3.25 ppm Aroclor-1260. (**BPJ**)

4.Page 5-48, Section 5-12: The site was a less-than-90-day storage area for drums before 1990. Has the status ever changed or remained the same since then? Please specify. Because the site is still in use, NFA request is deferred until the site is decommissioned. (**BPJ**)

PRS 53-001(e), Waste Accumulation at Building TA-53-25

5.Page 5-51, Section 5.13: The investigation was conducted at a location which is neither the original site in the SWMU Report, nor the site which was indicated in a 1989 photograph. It is hard to imagine that the site shown in the photograph is incorrect. LANL must provide evidence to justify whether the new site is the right one. (**BPJ**)

Risk Assessment Calculations: PRS 53-001(a) and 53-012(e)

6.Page C-5: The equation of calculating 95% UCL of the arithmetic mean is unclear to the reviewer. Plugging the given default numbers into the equation, the calculated result, the 95% upper confidence limit of the mean for PRS 53-001(a), is 283,828. LANL shall explain: 1) how the default parameters were generated, and 2) why the result is not realistic. (**BPJ**)

7.Page C-4, Section 2.1: It states, "NMED/EPA recommends using the 95% upper confidence level (UCL) of the arithmetic mean (95% UCL) to estimate EPCs." However, on Page C-5: it states, "The calculated 95% UCL of the mean exceeded the maximum detected concentration (3.25 mg/kg aroclor-1260) at PRS 53-001(a). Therefore, the maximum detected value (3.25 mg/kg aroclor-1260) was used as the EPC for PRS 53-001(a)." It is quite confusing to the reviewer. LANL shall explain it. (**BPJ**)