

0011
TAA-21

MAY 3 1 1996

Mr. Benito Garcia, Chief
Hazardous and Radioactive
Materials Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, NM 87502

Re: RFI Reports 1B, 1C and Addendum 1B and 1C for Technical
Area 21, Los Alamos National Laboratory (NM0890010515)

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed and approves the following reports with the attached list of modifications: Phase Report 1B (February 1994), Phase Report 1C (March 1994) and the Addendum to Phase Reports 1B and 1C (January 1995). The approved report shall consist of the above reports, the Notice of Deficiency Response dated April 14, 1995, and the enclosed list of modifications. This approval does not extend to those sites for which additional sampling or assessment is required. Reports for sites which require additional work will need to be reviewed and approved separately as information becomes available.

Should you have any questions, please feel free to contact Ms. Barbara Driscoll at (2140 665-7441).

Sincerely,

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

Enclosure

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List of Modifications
RFI Report 1B, 1C and Addendum to 1B and 1C
Technical Area 21, Los Alamos National Laboratory

These reports covered the following Solid Waste Management Units: 21-004(d), 21-006(b), 21-007, 21-008, 21-011(k), 21-019(a-m), 21-020(a-b), 21-021, 21-022(h), 21-023(c), 21-024(a-o), 21-026(d), 21-027(a-d).

Modifications and Request for Information:

1. The NOD Response to deficiency number 3 indicates that Tables 1 and 2 in the response show that acetone and methylene chloride were detected in blanks for SWMUs 21-024(a, h, and l). This contradicts text for SWMU 21-024(l) which indicates that no QA/QC samples were associated with this site. When were the blind samples submitted to the labs, and why were so many samples submitted? The number of blind samples submitted almost equals the number of samples collected during the investigation.

Because the levels of acetone and methylene chloride were low, EPA agrees that LANL may request a Class 3 permit modification for the following sites under No Further Action (NFA) Criterion 5 (*The PRS has been characterized or remediated in accordance with current or applicable state or federal regulations, and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use*):

21-024 (f, g, h, l)

2. A review of the information provided for PRS 21-024(a) in the Addendum report does not mention the presence of benzene or 1,1-dichloroethene. The information provided in the NOD Response indicates a need for further assessment at this site. EPA concurs that additional sampling should be conducted. LANL shall submit a schedule for a Phase II workplan and sampling.
3. EPA requested documentation that LANL had addressed problems noted in deficiency #4 of the NOD on this Addendum. In LANL's response they indicate that a memo will be forthcoming from the ER Project Office. EPA has not received this memo. LANL shall submit documentation that the quality assurance problems (sample batching) have been corrected.
4. LANL needs to provide schedules for sampling and reports

completed at 21-006(b) and 21-027(c).

5. EPA concurs that SWMU 21-007 may be removed from the permit, as SWMU 21-021 overlaps the area of concern. NFA Criterion 1: The site cannot be located or has been found not to exist, is a duplicate potential release site (PRS), or is located within and therefore, investigated as part of another PRS.
6. The NOD Response to deficiencies 21, 22, and 23, as well as, any other responses directed to the use of LANL's position paper on polycyclic aromatic hydrocarbons (PAHs) do not reflect the position of EPA. In a letter dated May 19, 1995, EPA addressed LANL's position paper entitled, "*Interim Guidance for Evaluating Polycyclic Aromatic Hydrocarbons in Soil*". EPA determined the use of a PAH data from a data set collected in New England was not appropriate for use at Los Alamos, and that LANL would need to collect their own data. Therefore, EPA has reevaluated the sites for which PAH data was discarded by LANL based on LANL's PAH position paper. LANL needs to complete the following actions:
 - a. Site 21-022(h): PAH values were below screening action levels (SALs). Will need to submit information for characterization of associated sump prior to final determination of this site.
 - b. Site 21-026(d): LANL must conduct a risk assessment as indicated in the NOD, as there are several exceedences of the screening action levels (SALs) by PAHs.
 - c. Grid extension: The presence of the elevated semivolatiles must be reevaluated.
7. LANL may request a Class 3 permit modification for SWMUs:
21-011(k)
21-023(c)