

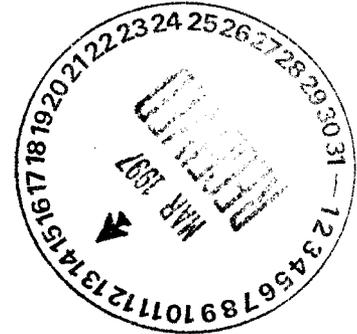


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

SLA

MAR 07 1997

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



Re: TA-21 RFI Report NOD comments on MDA V, PRS 21-018(a), Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed LANL's RFI Report for MDA V, TA-21, dated August 9, 1996, and has found the Report to be deficient. Enclosed are a list of deficiencies for your review.

Should you have any questions, please feel free to contact Mr. Rich Mayer at (214) 665-7442.

Sincerely,

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

Enclosure

15-000 1004 1106/TA-21-018(a)

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NOD Comments on the RFI Report for MDA V, TA-21, PRS 21-018(a)

General Comment No. 1: From reviewing the approved workplan, LANL did not complete all the borings that were required. LANL did not complete the following boreholes:

- 1) Five inclined holes drilled underneath the three adsorption beds. Two borings at a 10 degree angle with a length of 200 feet; 2 borings at a 10 degree angle with a length of 175 feet; and, one boring at a 30 degree angle with a length of 175 feet; and,
- 2) One 75 foot vertical borehole into absorption bed number one.

Unless there was an approved change to the workplan that eliminated the above borings, EPA will require that LANL complete these borings. **Best Professional Judgement (BPJ).**

General Comment No. 2: In the revised RFI Report, please include the organic vapor readings and any associated notes (field screening) for each soil interval from each soil coring; and, 2) the lithologic soil descriptions for each soil coring, which would include any noted visual or olfactory contamination. **BPJ.**

General Comment No. 3: In the revised RFI Report please include the following: 1) A table which includes the metal, volatile, and semivolatile results for each soil interval analyzed. The table shall include the analytical method used for each "active" sample, and the detection limit for each sample analyzed. The background concentrations for metals and radioactivity shall also be included in this table. The tables in the existing report only includes concentrations that exceed reporting limits or concentrations that exceed background screening levels. EPA would like to see the concentrations for the full length of each boring. **BPJ.**

General Comment No. 4: EPA will require deeper borings at the following borehole/trench locations to determine the vertical extent of contamination: 21-2519; 21-04508; 21-04505; 21-04506; 21-04507; 21-04509; and 21-04510. This requirement assumes that the most vertical interval shown in the various tables in the report was the deepest sample interval taken for that boring. For example, boring 25-2519 at the 75 foot sample interval had a concentration of copper at 47.3 mg/kg, almost 24 times the background concentration. The sample result at 75 feet was the last one shown in the tables for this boring (See page 68). **BPJ.**

General Comment No. 5: EPA did not review the risk assessment sections of the RFI report. When LANL provides the additional information/data requested by EPA, then a review of the risk assessment sections will occur. Also, EPA recommends that LANL include a ecological assessment section in this and in future

reports; otherwise, EPA can not approve a no further action decision, unless the site is obviously clean and the background numbers are reasonable. BPJ.

Page 23; Inorganic Analyses: What were the reason(s) for LANL missing the holding times for mercury in many of the soil samples and what steps have been taken to correct this problem. BPJ.

Page 23; last paragraph: When discussing the various problems associated with each analytical request, please include the sample numbers so that EPA can locate the sample results in the appropriate tables. This comment pertains to all paragraphs under Section 4.1, which discuss QA/QC problems associated with a particular analytical request. BPJ.

Page 40; 4th paragraph: When will the report on the 755 foot borehole be submitted? BPJ.

Page 42; Table 5.1.4-1: Soil sample locations 21-1866, 67, and 68 are not on Figure 5.1.4-1. Are these background borings? Please clarify. BPJ.

Page 48; 3rd paragraph: Why did LANL drill the seven vertical boreholes outside the fenceline (to the east-southeast) of the absorption beds? These borings were not included in the approved workplan. Please clarify in the revised Report. BPJ.

Page 56; Deviations from the Work Plan: See General Comment No. 1 above. BPJ.

Page 58; Background Comparisons: Please provide the actual concentrations found (in table form) for each background soil sample taken from the fill, Unit 3 Tshirege member, and from the Unit 2 Tshirege member. BPJ.