



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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to Doc/K...
by 10/10/97
Benito

AUG 29 1997

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

12/9011/1

Re: Response to the NOD Comments for the RFI Report for SWMU 21-018(a), Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed LANL's Response to the NOD Comments pertaining to the RFI Report for SWMU 21-018(a), dated August 1, 1997, and has determined the Report to be complete. However, EPA disagrees with LANL's recommendation that this site meets the criteria of a No Further Action determination. EPA recommends that further sampling is needed to determine the vertical extent of contamination at some locations. Enclosed are EPA's comments and recommendations regarding this Report.

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

Sincerely,

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

Enclosure

TL



**Comments on the NOD Response to the
RFI Report for SWMU 21-018(a)**

General Comment: EPA disagrees with LANL's recommendation of No Further Action for the following reasons:

1. LANL did not complete all the borings required in the approved workplan, thus not thoroughly investigating the SWMU;
2. In some of the borings that they did complete, the full vertical extent of contamination was not determined; and,
3. Many of the mercury analysis performed at this SWMU exceeded the holding times by 14-180 days; resulting in data of questionable validity.

General Comment: All future bore logs/descriptions completed at LANL should include the background PID/OVA reading for each boring. On the logs submitted, LANL shows the field screening result for each interval as being background, but does not include the background reading.

General Comment: EPA approved the workplan under the assumption that all the borings (in phase I and II) would be completed. In the approved workplan, LANL was supposed to drill five inclined boreholes underneath the three absorption beds. Also, a 75 foot vertical borehole was to be completed in absorption bed 1. None of these borings were completed. LANL must notify and obtain approval from the Administrative Authority if changes are made to the work plan. If LANL makes changes to the work plan without approval from the AA, LANL is taking a risk that they may have to do the work over! There is no guarantee that the AA will sympathize with LANL for not following the approved work plan.

In this case, after reviewing the data, EPA will not require all the slanted borings mentioned above but will still require an additional 75 foot vertical boring in bed 3, preferably at the intersection of the two pipes. Also, deeper borings will be required at soil boring locations 21-04509 and 21-4505 (to at least 25 feet) and at soil boring location 21-2519 (to 100 feet) to determine the vertical extent of contamination. Soil samples shall be analyzed for the same chemical constituents and the same soil intervals as the previous investigation.

Page 11 of the Response: SW-846 requires that non-aqueous samples be refrigerated and analyzed as soon as possible, not at LANL's discretion. Also, SW-846 requires that the holding times for

solid mercury samples be 28 days. LANL must ensure that the holding times are met. It appears to EPA that LANL is not taking the holding times for mercury seriously, since there were several sampling requests that missed the holding times from 14-180 days. EPA does not have confidence that the data presented is valid. The mercury results with the missed holding times can not be used in a risk assessment.

LANL will need to resample the soil intervals that missed the holding times for mercury, especially those that were missed by 7 days or more. **NOTE to NMED:** NMED may want to require a stricter or more lenient timeframe.