



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

DEC 16 1997

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

Re: Additional Comments on the Supplemental Information Response
to the Voluntary Corrective Action (VCA) Completion Report
for SWMU 21-024(d), Los Alamos National Laboratory (LANL),
EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed
LANL's Supplemental Information Response to the VCA Completion
Report for SWMU 21-024(d), dated October 30, 1997 and has
additional comments. Enclosed are the additional comments.

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



10325

TU

**Additional Comments on the Supplemental Information
Response to the Voluntary Corrective Action
Completion Report for PRS 21-024(d)**

General Comment No. 1: EPA is concerned about the sampling logic used down-gradient of the outfall for this SWMU. Sample location 21-1347, next to the outfall, only went to 6 inches and is not of sufficient depth to determine, within a reasonable amount of confidence, that the vertical extent of contamination has been determined. Secondly, sampling for VOC's in the top six inches of the soil will almost always show nothing, due to volatilization, etc. LANL must take deeper samples at his location.

At sampling location 21-1348, lead was found in the 12-18 inch sample (the most vertical sample taken) at 146 mg/kg. Deeper samples are needed at this location.

General Comment No. 2: EPA prefers or recommends that LANL use two of the four sampling locations proposed (found in the Supplemental Response, page 2) for underneath the inlet pipe to be used for deeper vertical soil samples down-gradient of the outfall area. See general comment no. 1.

General Comment No. 3: As a reminder, future VCA or RFI Reports submitted by LANL must provide the following information:

1. Boring log descriptions and PID/OVA readings;
2. All analytical sampling results (not just results above SAL or background), including any historical sampling performed before the RFI investigation;
3. Pertinent QA/QC discussion on the analytical results; and,
4. Human health and Eco screening assessments if pertinent. For example, if all results are either below acceptable detection limits for organics and below background levels for inorganics, no risk assessment info is needed.

Page 2 of Response; 1st paragraph: In future investigations, LANL should not use sampling intervals of two feet, intervals greater than 1 foot are unacceptable, unless a practical justification can be provided.

Notes to NMED

Even though EPA may have earlier given informal permission to

LANL to NFA this SWMU, this reviewer cannot in good conscience agree with a NFA recommendation until the issues found in EPA's general comments (see above) are addressed. So in actuality, LANL needs to complete the additional soil samples before a NFA determination can be considered.