

HSWA LANL 7/1/98 21-024(i), 21-024(i)



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

5th -
Please forward to
LANL/DOE by 8/15/98
or return to EPA by
same date if not
Bart

July 7, 1998



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

RE: Review of the LANL IA Plan for PRS 21-024(i),
EPA I.D. No. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a technical review of the Los Alamos National Laboratory (LANL) Interim Action (IA) Plan for Technical Area 21, Potential Release Site (PRS) 21-024(i), dated June 9, 1998. Based on the information provided in the document, EPA finds parts of the Plan to be deficient and encloses a list of deficiencies.

If you have any questions or need additional information, please contact Mr. Allen T. Chang of my staff at (214) 665-7541.

Sincerely yours,


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

Enclosure

TV



LIST OF DEFICIENCIES
LANL INTERIM ACTION (IA) PLAN FOR PRS 21-024(i)

1. Page 1, 3rd paragraph: It states, "PRS 21-024(i) has also been evaluated for water quality concerns... The site received a score of 59 and has been reviewed by the Surface Water Assessment Team."

Please specify what chemical(s) attributes to the low score and where the source(s) of contamination comes from. Since the pipe line and the septic system site were abandoned in place in 1965, where does the source of water come from? From storm water? **(Best Professional Judgement (BPJ))**

2. Page 2, 2nd paragraph: How deep was the VCP pipe buried? The previous investigation, as shown in Figure 9.1-1, did not sample the soil along and beneath the pipe. LANL should revise the IA Plan to include sampling the pipeline as stated. **(BPJ)**

3. Page 2, the last sentence of the 3rd paragraph: It states, "Results of laboratory analyses showed metals (arsenic, lead, chromium, and barium) and radionuclides at levels greater than background."

LANL should include mercury because mercury, in several samples, exceeded LANL background UTL (See Figure 9.1-2). Two of them (one at 120 ppm and the other one at 28 ppm) exceed LANL's SAL for mercury (23 ppm). After removal of the contaminated soil, LANL should collect confirmatory samples for mercury. **(BPJ)**

4. Page 4, Section 4.2 Sampling: Septic Tank and Lines: It states, "Additional samples will be taken at each of the four vertical edges of the excavation to evaluate if any migration has occurred from the tank."

LANL should discuss how to determine if a migration has occurred from the tank. Therefore, the sampling should be done for the vertical walls. In addition, if the excavated area becomes larger than the immediate tank removal area, more vertical wall sampling should be done. There is no discussion of the sampling of the influent and effluent lines for a release and for hazardous materials in the pipeline sludge. **(BPJ)**

5. Page 5, Section 4.2 Sampling: Septic Tank and Lines: The IA Plan specifies that it will collect four (4) samples within the footprint of the tank and four samples at each side.

LANL should also collect additional four samples along and beneath the pipe line. (BPJ)

6. Because the sampling results will be used to assess the need for further remediation or investigation, LANL should also discuss the data quality samples and QA/QC in the IA Plan. (BPJ)