



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

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

Re: Comments on the Interim Measures Plan (ICM) for SWMU 21-018(a)-99, LA-UR-99-3406, E/ER:00-028, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Bearzi:

The Environmental Protection Agency (EPA) has reviewed LANL's IMP for SWMU 21-018(a)-99 dated February 1, 2000, and offer the enclosed comments for your review. Should you have any questions, please feel free to contact Mr. Rich Mayer at (214) 665-7442.

Sincerely,


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

Enclosure

HSWA LANL 1/11/00/21



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Comments on LANL's
IMP for SWMU 21-018(a)-99
LA-UR-99-3406
E/ER:00-028

Comments on LANL's IMP for SWMU 21-018(a)-99

1. **General Comment:** The plan needs to distinguish the differences between a "cold demonstration and "hot" demonstration and explain the need for both "phases".
2. **General Comment:** This reviewer questions why an ecological scoping checklist and a surface water assessment is included with this document, since this is not a decision making document.
3. **General Comment:** This document does not explain or describe in detail why NTISV is being considered as a possible remedy for sites at LANL, other than DOE has made funding available for this project. Generally, the document lacks pertinent information needed for the usefulness of this technology, such as: what type of sites can this technology be used; what type of contaminants is it effective; how long will the treatment be effective; the effectiveness of the technology per geologic condition(s), etc.