



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6

1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

April 21, 2009

Mr. David R. Gregory,
Project Director
Department of Energy
Los Alamos Site Office
Los Alamos, New Mexico 87545

Michael J. Graham
Associate Director
Environmental Programs
Los Alamos National Laboratory
P.O. Box 1663, MS M991
Los Alamos, New Mexico 87545



RE: **Comments on the Notice of Self Implementation of On-Site Cleanup of PCB Remediation Waste at Consolidated Unit 21-003-99 and SWMU 21-024(c) at Los Alamos National Laboratory (LANL)**

Dear Mr. Gregory and Graham:

The U.S. Environmental Protection Agency (EPA) has completed its review of the above referenced document (dated March 31, 2009) and has determined the document to be technically deficient. Please respond (by addressing each comment) to EPA's comments by May 8, 2009. Enclosed are EPA comments.

If you have any questions regarding the enclosed comments, please call me at (214) 665- 7442.

Sincerely yours,

Rich Mayer, P.G.
Sr. Environmental Engineer

Enclosure

cc: Kathryn Roberts, NMED



Comments on the Notice of Self Implementation of On-site Cleanup of PCB Remediation Waste at Consolidated Unit 21-003-99 and SWMU 21-024(c)

- 1. Page 2; Standard Operating Procedures:** Please include the analytical procedure(s) used to analyze the samples.
- 2. Page 5; Disposal Technology:** Please provide the facilities where the PCB remediation wastes will be disposed.
- 3. Page 5; Schedule:** Please provide a date when the PCB Cleanup Report for Consolidated Unit 21-003-99 and SWMU 21-024(c) will be submitted to EPA and NMED.
- 4. Page 6, Approach:** The verification/confirmation sampling of the various cleanup areas does not meet the requirements of Subpart O, 761.280(b). In general, a square base grid system must overlay (the entire area) each cleanup area, with verification samples taken 1.5 meters apart. Also, if after removal, there are still obvious visual signs of contamination, then additional removal should occur before verification sampling.