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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

Ron X
Barbara
Tevi ✓
Susan ✓

SEP 20 1995

Mr. Theodore J. Taylor
Program Manager
Department of Energy
Los Alamos National Laboratory
Los Alamos, NM 87544

Re: Notice of Deficiency, RFI Report, Technical Area 31 (31-001)
Los Alamos National Laboratory (NM0890010515)

Dear Mr. Taylor:

The Environmental Protection Agency has reviewed the RCRA Facility Investigation report for Technical Area 31 concerning Solid Waste Management Unit (SWMU) 31-001, and found the report to be deficient. Los Alamos National Laboratory has 60 days from receipt of this letter to address the enclosed list of deficiencies.

If you should have any questions, please contact Ms. Barbara Driscoll at (214) 665-7441 or Mr. Rich Mayer at (214) 665-7442.

Sincerely,

David W. Neleigh
David W. Neleigh, Chief
RCRA New Mexico - Federal
Facilities Section

Enclosure

cc: Mr. Benito Garcia
New Mexico Environment Department
Mr. Jorg Jansen
Los Alamos National Laboratory, MS M992



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List of Deficiencies
Los Alamos National Laboratory
Technical Area 31, PRS 31-001

Deficiencies:

1. LANL shall include the unvalidated analytical results in the revised report.
2. LANL shall include the soil boring descriptions and all PID readings.
3. Neither the background study nor LANL's statistical approach for the upper tolerance limit has been approved by EPA.
4. EPA will evaluate the sampling values for all polycyclic aromatic hydrocarbons against their calculated action level and not against any background value proposed by LANL until a background study has been approved.
5. EPA has not agreed to all the concepts outlined in Figure 4.
6. **4.3 Conclusions, Actions, and Recommendations, p. 36** - EPA concurs with the recommendation to remove the contaminated area surrounding the outfall. EPA is still concerned that the contamination has not been delineated vertically. This has not been confirmed since soil samples were only taken at the surface (6 to 13 inches). Please submit a removal plan in conjunction with the revised report which addresses the above concern.