

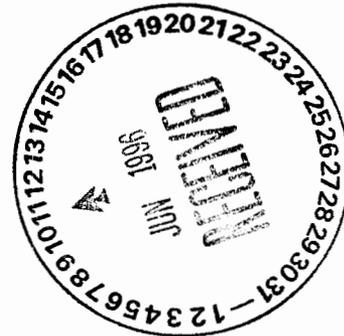
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

JUN 07 1996



Mr. Benito Garcia, Chief  
Hazardous and Radioactive  
Materials Bureau  
New Mexico Environment Department  
2044 Galisteo Street  
Santa Fe, NM 87502

Re: NOD Response for PRS 31-001  
Los Alamos National Laboratory (NM0890010515)

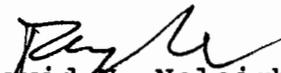
Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed the Notice of Deficiency (NOD) Response dated November 28, 1995, for the RCRA Facility Investigation Report on Potential Release Site (PRS) 31-001. Currently, EPA cannot concur with a no further action recommendation for this site until the additional information outlined in the attached enclosure is addressed.

Review of the NOD Response also required review of a Voluntary Corrective Action Plan and VCA Completion Report for PRS 31-001. These additional documents did not provide sufficient information for a final decision at this site; therefore, a second NOD was determined to be appropriate.

Should you have any questions, please feel free to contact Ms. Barbara Driscoll at (214) 665-7441.

Sincerely,

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

Enclosure



2167

FILE LANL HSWA 1/1079/31-001

**List of Deficiencies**  
**RFI NOD Response 31-001**  
**Los Alamos National Laboratory**

**General Comment:** LANL needs to provide detailed figures or photographs of the area to be remediated with the VCA plan and the final report. The actual area remediated for this site was approximately 6 feet long, but width and depth are not provided in the report. In Figure 4 the blow up of the area shows a site approximately 1/2 inch in size. Surely, LANL can provide a more detailed figure of the actual excavation site. LANL might also provide a photograph with a scale showing the site after excavation.

Comments on: Voluntary Corrective Action Plan for Site under Field Unit 1 at TA-31, East Receiving Yard: 31-001, Septic System Outfall, June 9, 1995

1. **Table 7-1, Description of Confirmatory Sampling, p. 10:** The analysis method for metals is indicated as Toxicity Characteristic Leaching Procedure (TCLP) and also 6010 which is an Inductively Coupled Plasma Atomic Emission Spectroscopy method. The use of TCLP for confirmation sampling is not appropriate, and should be used for a hazardous waste determination. EPA notes that in the final VCA report (September 22, 1995) target analyte list metals were used rather than TCLP.
2. **Methodologies for Developing Site-Specific Preliminary Remedial Goals to Demonstrate Clean Closure, p. E-3:** For an industrial exposure scenario, LANL should backcalculate a soil concentration for carcinogens from a target cancer risk value of  $10^{-6}$  rather than the  $10^{-4}$  which was indicated in this document.

Comments on: Voluntary Corrective Action Completion Report, Potential Release Site 31-001, Septic System Outfall, September 22, 1995.

3. **Corrective Action, p. 23:** Text indicates that due to the extreme slope, backfilling and reseeding were considered to be ineffective. There are other means of stabilizing a slope, and this slope should have been stabilized following the excavation of the soil. LANL needs to provide a plan for stabilizing the slope or information related to how the slope was stabilized.
4. **Corrective Action, p. 23:** Text indicates that field screening did not indicate the presence of volatile organic vapors above background levels. LANL should provide the detection limits for the field screening devices used for volatile organics to support this sentence.

5. **Corrective Action, p. 23-24:** Text is confusing in regards to the number of confirmatory samples collected and the analysis conducted. Text on page 23 indicates two confirmatory samples were collected from the excavated area, and analysis was conducted for PCBs, and TAL metals. Text on page 24, indicates that three confirmatory samples were collected and analysis was only for PCBs. LANL needs to clarify the confirmation sampling and analysis which was conducted and supply all analytical results.

In addition, polycyclic aromatic hydrocarbons were found at this site above action levels, and LANL indicates that these should have been remediated with the other materials. Confirmatory sampling must be provided to substantiate this claim.

6. **Corrective Action, p. 24:** The depth and width of excavation should be provided. LANL indicates that material was removed to the tuff, but the depth is not included.



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HSUP LAMJL 1/1079/310/21000

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Sincerely,

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

Enclosure

JUN 07 1996

KIT  
6/12

111079131

Mr. Benito Garcia, Chief  
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New Mexico Environment Department  
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Facilities Section

Enclosure

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6PD-N  
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**List of Deficiencies  
RFI MOD Response 31-001  
Los Alamos National Laboratory**

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