



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

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APR 24 1995

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Mr. Joseph C. Vozella
Assistant Area Manager
Environment, Safety and Health
Branch
Department of Energy
Los Alamos Area Office
Los Alamos, NM 87544

Re: RFI Report for Technical Area 33
Los Alamos National Laboratory (NM0890010515)

Dear Mr. Vozella:

The Environmental Protection Agency has reviewed the RCRA Facility Investigation (RFI) Report dated January 26, 1995, for Potential Release Sites in Technical Area 33, and found it to be deficient. Enclosed is a list of deficiencies for which you have thirty (30) days to respond from receipt of this letter.

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

Sincerely,

William K. Honker, P.E., Chief
RCRA Permits Branch

Enclosure

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



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**Operable Unit 1122
RFI Report Technical Area 33**

LANL may request a Class 3 permit modification for removal of the following sites from the HSWA permit:

33-004(d)
33-004(g)
33-004(h)
33-010(e)
33-010(f)
33-011(e)
33-012(a)

List of Deficiencies

1. **Statistical Methodology, p. 21** - LANL should provide the methodology of how they will compare the upper tolerance limits from the background data with the upper confidence limits calculated from data for the risk assessment.
2. **33-004(i)** - In order for EPA to evaluate the risk assessment which was conducted LANL must provide their calculations and a computer printout verifying their reported values.
3. **33-005(a,b,c)** - Toluene was reported in a method blank, as well as several samples; however this information was not presented in the report. LANL needs to provide this information.
4. Whenever contaminants found during the investigation of one SWMU are attributed to an overlapping or adjacent SWMU (for example: 33-011(a) and 33-005(a-c)), the report figure should indicate the location of the SWMU to which the contamination is attributed.
5. **SWMU 33-015 p. 93** - See deficiency #2 above.
6. **SWMU 33-011(a)** - EPA will need to evaluate whether it is reasonable for LANL to compare this area with a urban, nonindustrialized area as in the report by Bradley et. al.(1994). LANL needs to provide the calculations and a copy of the mentioned report. In addition, LANL needs to provide the calculations for the risk assessment which was conducted, and LANL should also provide risk calculations based on a residential scenario.

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