

JUN 07 1996

Mr. Benito Garcia, Chief
Hazardous and Radioactive
Materials Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, NM 87502

RE: Review of RCRA RFI Report for Potential Release Sites (PRSs)
in Technical Area 33,
Los Alamos National Laboratory NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed its review of Los Alamos National Laboratories (LANL) RCRA RFI Report for Potential Release Sites (PRSs) in Technical Area 33 submitted by LANL on January 8, 1996. The report was found to be deficient. Enclosed is a list of deficiencies which EPA recommends that LANL be allowed sixty days to respond.

If you have any questions or need additional information, please contact Mr. Allen T. Chang of my staff at (214) 665-7541.

Sincerely yours,

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

Enclosure

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**List of Deficiencies
RFI Report for Technical Area 33
Los Alamos National Laboratory**

This RFI Report including information on the following SWMUs:

33-004(b,c,j,m)
33-006(a,b)
33-007(a,b)
33-010(a,b,c,d,g,h)
33-011(b,c)
33-014

LANL may request a Class 3 permit modification for removal of the following sites from the HSWA permit under no further action Criterion 5 (The potential release site (PRS) has been characterized or remediated in accordance with current applicable state or federal regulations, and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use):

PRS 33-004(m), NRAO Septic Tank TA-33-179
PRS 33-006(b), East Site Shot Pads
PRS 33-010(h), South Site Surface Disposal
PRS 33-011(c), South Site Blivit Storage Area
PRS 33-014, South Site Burn Pit

General Comment:

1. RFI Reports should present all the analytical data (including those which were above either the LANL UTL or the TA-33 UTL) which was used as the basis for any decision making. (Best Professional Judgement, (BPJ))
2. Sites which are listed on the HSWA permit, and for which LANL is proposing a voluntary corrective action (VCA) should still have all the analytical results submitted. The VCA report may function as the equivalent of the RFI Report, provided all the sampling and analytical data is provided in the VCA. Otherwise, LANL needs to provide the RFI data. This applies to the following SWMUs: 33-010 (a, b, d, g, and h). (BPJ)

Site Specific Comments:

1. 1st Paragraph, Page 28: Since text indicates "Activities of thorium isotopes were not known", how could LANL tell that "but they appear to be within LANL background UTLs"? (BPJ)
2. Table 4.4-3, Page 30: Please specify units (mg/kg?) of the analytic results. (BPJ)

3. PRS 33-004(b), South Site Septic System, Table 5.1.6-1, p.41: Sediment samples from the tank bottom indicated several hazardous constituents including inorganics and Benzo(a)anthracene and Benzo(b)fluoranthene are higher than their respective screening action levels (SAL). LANL shall remove and properly dispose of the bottom sludge in the tank. (BPJ)
4. PRS 33-004(c), East Site Septic System, 2nd Paragraph, p.43: The septic system is currently operational under NMED Permit LA-34. Please specify what kind of permit this is (a RCRA permit or wastewater permit)? (BPJ)
5. PRS 33-004(j), 1st Paragraph, p. 51: Copper was detected above LANL and TA-33 background upper tolerance limits (UTLs), but below the SAL of 2800 mg/kg. LANL shall submit all copper results which are above background UTL. (BPJ)
6. PRS 33-006(a), Table 5.5.9-1, p. 70: Uranium and copper are widespread around the shot pad. Has LANL conducted any radionuclide activity survey to find whether the copper was contaminated with radioactivity? (BPJ)
7. PRS 33-006(a), 5.5.9 Extent of Contamination, p. 70: Text indicates two different SALs for copper. In the 1st paragraph of the page, copper's SAL is 3000 mg/kg, while in Table 5.5.9-1, the SAL is 2800 mg/kg. LANL needs to provide a correction. (BPJ)
8. PRS 33-007(a), East Site Firing Area, p. 84: Since the site is occasionally used for short-term experiments, it is not appropriate to NFA this site until decommissioning. (BPJ)
9. PRS 33-007(b), 2nd last Paragraph, p. 100: Text states, "High uranium concentrations were detected in several samples from this berm (Table 5.8.5-4). Six samples contained uranium only slightly above SAL." Table 5.8.5-4 showed that 3 samples were over 1000; 8 samples were between 100 and 1000; 5 samples were below 100 and above 29 (SAL). There are a total of 16 samples with results above SAL, not 6 samples. (BPJ)
10. PRS 33-010(a), East Site Canyonside Disposal, p. 105: LANL shall submit the sampling results of uranium, cadmium, and chromium that were above SALs at this site, and shall submit confirmatory sampling result for these inorganics after completion of VCA. (BPJ)
11. PRS 33-010(b), East Site Canyonside Disposal, p. 106: LANL shall submit the sampling results of uranium, cadmium, and chromium that were above SAL in this site, and shall submit confirmatory sampling result for these inorganics after completion of VCA. (BPJ)

12. PRS 33-010(c), South Site Surface Disposal, p. 106: A recreational exposure scenario may not be appropriate for this site, as chunks of uranium and copper shrapnel appear on the site, and could be picked up by a hiker. LANL should conduct a cleanup to pick up the large chunks of uranium and copper. (BPJ)
13. Table 5.11.5-1, p. 109: Results in this Table indicate copper was not analyzed; however, results in Table C-1 which is a duplicate indicate copper was found at 847 mg/kg. What is the reason for this discrepancy? (BPJ)