



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JUL 17 1996

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

Re: Approval of RFI Report for 14 SWMUS in TA-33
Los Alamos National Laboratory

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed and recommends approval of the Los Alamos National Laboratory RFI Report for Technical Area 33, dated January 26, 1995, with the enclosed list of modifications. The approved report would consist of the original document dated January 26, 1995, the Notice of Deficiency Response dated May 24, 1995, and the enclosed list of modifications. Information submitted in response to the enclosed list of modifications or request for additional information will be reviewed and approved separately. The EPA recommends allowing LANL 90 days for responses to information requests.

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



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Modifications
RFI Report for Technical Area 33
Los Alamos National Laboratory

These comments address the RFI Report for TA-33 in which the following sites were discussed: 33-004(d,g,h,i), 33-005(a,b,c), 33-007(c), 33-010(e,f), 33-011(a,e), 33-012(a) and 33-015.

1. LANL may choose to request a Class 3 permit modification for the following sites under NFA 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):

33-004(d)
33-004(g)
33-004(h)
33-010(e)

2. LANL may choose to request a Class 3 permit modification for the following sites under NFA Criteria 1 (The site cannot be located or has been found not to exist, is a duplicate PRS, or is located within and therefore, investigated as part of another PRS):

- a. **33-05(a,b,c):** This site will be investigated as part of SWMU 33-011(a). In addition, all lab contamination should be reported in the Tables and should be indicated with a qualifier (b) for lab contamination. This applies to the toluene which was identified as a lab contaminant at this site. This information was requested in the Notice of Deficiency dated April 22, 1995, and was not provided in the NOD Response dated May 24, 1995.
- b. **33-004(i) - Conclusions and Recommendations, p. 71:** The low levels of PAHs found at this site were addressed with SWMU 33-017. LANL needs to include the lead found at this site with the risk assessment for lead at 33-017, as the lead is attributable to the vehicle maintenance area. If LANL revises the risk assessment accordingly, then LANL may request a Class 3 permit modification for 33-004(i) under NFA criteria 1 as agreed to in the Document of Understanding between NMED, EPA, DOE, LANL and Sandia National Laboratories.

Additional information and data is required for the following sites:

3. **33-010(f), p. 81:** LANL should evaluate aerial photographs of these sites to determine when they may have originated. Better figures and photos of the sites should be provided.

In addition, since the piles are located on the slopes of a tributary, samples should also be collected in the drainage leading from the site. Analysis should be conducted for pesticides including PCBs, in addition to inorganics, and SVOCs. LANL shall submit a modified sampling plan for this site with detailed figures indicating the location of proposed samples.

Best Professional Judgement

4. **33-011(e), p. 86:** The RFI Work Plan for OU 1122 indicates that the contents in the drums was unknown, and the only analysis conducted at the two samples collected from this area was for herbicides and one for pesticides. LANL should determine the location of the previous drums to the extent possible (maybe use aerial photos, or additional interviews of staff who were on site). Resampling should be conducted where drums were previously stored with analysis for inorganics, SVOCs, and VOCs.

LANL shall submit a modification to the workplan with addresses the samples to be collected.

Best Professional Judgement

5. **33-012(a), p. 90:** PCBs were found at a level of greater than 1 mg/kg in an area accessible to drainage. Region 6 has a general policy of remediating PCBs to 1 mg/kg in any area located near drainage. The PCBs must therefore be addressed. LANL may request in writing an exemption from sending the material to a PCB landfill from the Region 6, Toxic Substance and Control Act group.

Best Professional Judgement

6. **33-015, p. 95:** The evaluation of potential exceedance of the sum of the multiple constituent ratios (SMCR) should be based on a site-wide basis not sample-by-sample basis. That is the maximum constituent concentrations of all detected contaminants (for all combined sample datum) should be used for the calculation of this sites SMCR. Lead may be addressed separately, and the lead from this site may appropriately be addressed with the lead findings combined in the evaluation of SWMU 33-017. LANL needs to resubmit the recalculation of the SMCR with the data used. If this value is still less than one then a Class 3 permit modification may be requested for this site under NFA Criterion 5.

Risk Assessment Guidance for Superfund Volume I, Human Health Evaluation Manual (Part A) pp.8-12, 8-13. OSWER 9285.7-01A, December 1989.

SWMU 33-007(c)

7. **4.11.3 Potential Release Characterization, p. 103:** LANL has collected background samples for arsenic which demonstrate the background value for this site should be at a maximum 2.0 ppm. The site-wide upper tolerance limit (UTL) and even the TA-33 calculated UTL are not appropriate for this site. The low background values at the site demonstrate that a release of arsenic has occurred at the site, and arsenic is a contaminant of potential concern.

Best Professional Judgement

8. **4.11.4 Evaluation and Recommendations, p. 104:** A complete determination for this site cannot be made until all data is reviewed; however, it would appear that the chunks of uranium found at the site will need to be removed.

Best Professional Judgement

SWMU 33-011(a)

9. **4.12.4 Evaluation and Recommendations, p. 112:** LANL may not compare the PAH levels detected at this site with the urban values presented in the Bradley et al. (Bradley, L.N.H., B.H. Magee and S.L. Allen, 1994. "Background Levels of Polycyclic Aromatic Hydrocarbons (PAH) and Selected Metals in New England Urban Soils, "in Journal of Soil Contamination, Vol 3 (4), p. 349). The risk assessment should be recalculated using all PAH data.

EPA letter to Mr. Taylor dated May 19, 1995: Evaluation of Interim Guidance for Evaluating Polycyclic Aromatic Hydrocarbons in Soil.