



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

APR 29 1998

*Sta -  
Please print comments  
to EPA/DOE by 5/5/98.  
or forward to EPA w/ letter  
by name like Benito  
5/5/98*

MSWA LANL 5/11/22/33

Mr. Benito Garcia, Chief  
Hazardous and Radioactive  
Materials Bureau  
New Mexico Environment Department  
2044A Galisteo Street  
Santa Fe, NM 87505

Re: Comments on the Supplemental Information for the RCRA  
Facility Investigation Report (RFI) for TA-33, PRSS 33-  
004(d, g-i), 33-005(a-c), 33-007(c), 33-010(e-f),  
33-011(a, e), 33-012(a) and 33-015, Los Alamos National  
Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed  
LANL's Supplemental Information for the RFI Report for TA-33,  
dated November 14, 1997 (received November 24, 1997), and has  
found the Response to be deficient. Enclosed are EPA's comments.

Should you have any questions, please feel free to contact  
Mr. Rich Mayer at (214) 665-7442.

Sincerely,

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

Enclosure



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## **Comments on the Supplemental Information for the TA-33 RFI Report**

This Report covers the following PRSs: 33-004(d, g-i), 33-005(a-c), 33-007(c), 33-010(e-f), 33-011(a, e), 33-012(a) and 33-015.

### **General Responses**

**Page 1 of Supplemental Response; Response:** At a minimum, EPA prefers/requires one hard copy of the data. Besides, EPA does not have the capability to read excel 4 format from WP 6.1.

**General Comment:** All additional sampling by LANL should include soil boring descriptions and PID/OVA field screening results on the descriptions. Descriptions should note any visual or olfactory contamination.

### **Specific Comments**

**Page 2 of Supplemental Response; Response 2:** First of all, EPA's policy does not allow five times the blank contamination concentration to be subtracted from the analyte concentration in the sample. EPA's policy allows no subtraction. Secondly, the EXCEL tables are not attached to the response. At a minimum, LANL should provide a "hard copy" of the EXCEL tables. Furthermore, LANL should always provide the actual concentrations to EPA.

**Page 2 of Supplemental Response; Response 3:** From reviewing the RFI Report, the deep samples were hand augured, which is okay, except for volatiles. Auguring will disturb the soil for volatiles, thus invalidating those samples. Secondly, 0-6 inch samples downgradient of the outfall are unacceptable. Deeper samples are needed, with volatiles to be analyzed in those deeper samples. EPA recommends deeper samples at the following Phase I soil sampling locations: 2138, 2139, 2140, and 2143. In summary, LANL should perform additional sampling at PRS 33-004(d).

**Page 3 of Supplemental Response; Response 4:** The RFI Report mentions that the one of the contaminants of concern is VOCs; however, LANL did not sample for VOCs in the Phase I investigation. EPA will require that LANL sample for VOC's in the Phase II investigation. EPA will also require deeper samples (2-3 feet) at the following Phase I soil sampling locations at PRS 33-004(g): 2146 and 2147.

**Page 3 of Supplemental Response; Response 5:** EPA will require deeper soil samples at Phase I soil sampling locations 1971 and 1972 at the 2-3 ft. intervals for PRS 33-004(h).

**Page 4 of Supplemental Response; Response 6:** LANL did not provide the sampling location for PRS 33-010(f) on a map, figure 2.2 is missing from Attachment D . Please provide this information. Also, EPA will require 2 samples, instead of one proposed by LANL; and must analyze the samples for SVOCs, pesticides, and PCBs, as requested in the NOD comment.

**Note to NMED:** EPA is not satisfied with the 0-6 inch samples that were taken in the debris piles. Samples should have been taken deeper in the debris piles. A backhoe for trenching the piles could have been used.

**Page 4 of Supplemental Response; Response 7:** LANL did not provide the sampling location for PRS 33-011(e) on a map, figure 2.2 is missing from Attachment E. Also, LANL did not provide for the sampling of inorganics as the NOD request required.

**Page 5 of Supplemental Response; Response 9:** From reviewing the RFI Report, LANL did not provide an ecological screening assessment. Also, in the human health screening assessment, lead should be evaluated by the IEUBK model, unless NMED has a different policy. In regard to phenanthrene not having a SAL, Region 6 has been using anthracene screening levels as a substitute, since it is similar chemically/structurally to phenanthrene.

**Page 6 of Supplemental Response; Response 10:** EPA will require that deeper soil samples be taken at the following Phase I locations for PRS 33-007(c): AAA2164; AAA2225; and AAA2226 in order to determine the vertical extent of contamination.

**Page 7 of Supplemental Response; Response 11:** EPA believes that deeper sampling is needed at Phase I sampling location AAA1990 for PRS 33-011(a), several PAHS were found in the 0-6 inch sample at concentrations greater than 20 mg/kg. Secondly, the information contained in Appendix H are not risk calculations but a statistical analysis of the data.