



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

*Stu -
This is one
that needs to
be acted on -
Pls forward and
address on
at Ben Garcia
1/14/97*

HSWA LANL FU 4, 000129, TA-35

JAN 10 1997

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

RE: Review of Los Alamos National Laboratory RCRA RFI Report for Potential Release Sites (PRSS) in Technical Area 35, EPA I.D. No. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a technical review of Los Alamos National Laboratory (LANL) RCRA RFI Report for Potential Release Sites (PRSS) in Technical Area 35, dated May 2, 1996. The EPA has found the Report to be deficient and enclosed is a list of deficiencies which EPA recommends that LANL be allowed sixty days to respond.

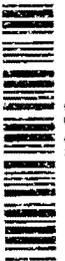
Based upon the soil sample results presented in the Report, EPA recommends that two (2) sites should not be added to the LANL RCRA/HSWA permit, and five (5) sites could be removed from LANL current RCRA/HSWA permit (see attached Summary Page). The EPA recommends that the Class 3 permit modification not be initiated by LANL until all comments have been resolved.

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

Enclosure



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TU

Review Summary
RFI Report for Technical Area 35
Los Alamos National Laboratory (LANL)

Sites Where No Further Action (NFA) Appears Appropriate

Based upon the information provided, EPA tentatively agrees with the NFA proposals for the following sites:

PRS 35-003(h), PRS 35-009(a,b,c), PRS 35-004(b)

Sites Where it is Appropriate Not To Add To LANL RCRA/HSWA Permit

Based upon the information provided, EPA tentatively agrees the following sites are not potential SWMUs and do not need to be added to LANL RCRA/HSWA Permit:

PRS 35-016(e), PRS 35-016(f)

Sites Where Additional Information is Needed

Additional information or further investigation is required for the following sites:

PRS 35-003(j,k), 35-009(d), 35-014(a,b,d,e₂), 35-015(b) and 35-016(i)

Sites Investigation Information are Unavailable at this time

The EPA did not review those sites because investigation information is unavailable at this time:

PRSS 35-003(d,e,f,g,l,m,o,q,r), 35-008, 35-014(e₁,f), and 35-016(g,h)

**LIST OF DEFICIENCIES
LOS ALAMOS NATIONAL LABORATORY (LANL)
RFI REPORT FOR PRSs IN TA-35**

GENERAL COMMENTS

1. LANL needs to provide NFA Criterion (LANL 1995, 53863), specific to this report only, in the form of an Attachment or a Figure as part of this report. (Best Professional Judgement, (BPJ))

SITE-SPECIFIC COMMENTS

- PRSs Nos. 35-003(j,k), 35-014(d), and 35-015(b)
1. Page 5-12, Table 5.4.4-1: According to the Report, Site 35-015(b) had been backfilled with clean soil material and covered with asphalt for a parking lot. How thick is the backfill soils? How does LANL know that the only sample, taken at a depth of 6 inches, is a representative sample, not a backfilled soil sample? If not, LANL shall re-sample the site. (BPJ)
 2. Page 5-12, Table 5.4.4-1: According to the Workplan (See Figure 7-28 and Table 7-12), the boring samples at the location ID 35-2286 will extend to 6 ft. in depth. LANL gave no explanation why the result showed in Table 5.4.4-1 was taken at 0 - 0.5 ft. LANL shall re-sample the location at approved depth. (BPJ)
 3. Page 5-19, Table 5.4.6-1: Several surface sample results indicated extraordinarily high in TPH concentrations, specially at Location ID No. 35-2081, 35-2089, 35-2090 and 35-2291. LANL should re-sample and analyze for the entire suite of petroleum hydrocarbons utilizing analytical methods 8240, 8020, and unmodified 8015. (BPJ)
- PRS 35-009(d) - An Abandoned Sanitary Septic System
4. Page 5-72, 3rd paragraph: One water sample was collected during the investigation as stated in the report. Please explain: 1) why the sample Location ID. 35-2228, did not appear either in Table 5.11.4-1 or in Figure 5.11.4-1; 2) No follow-up of the investigation on this sample although organic vapor were detected (6.0 ppm) when the septic tank lid was opened, and organic vapor was detected at the surface of the water sample and was recorded at 1.0 ppm. (BPJ)
 5. LANL shall explain why tuff cooling Qbt3 was sampled and analyzed for background comparison purposes. Conflicting statements are made about what tuff units were actually sampled. For example, Qbt3 is described in the stratigraphy section as a poorly welded tuff, and paragraph 5.11.2 states that consolidated tuff is reached at depths from 8 to 10

feet in the leach field. Is the tuff in the leach field naturally in-place, or does it comprise fill material? Could the tuff sampled for background determinations be fill material rather than in-place Qbt3? How was it possible to use a hand auger to sample consolidated tuff? (BPJ)

PRS 35-014(a) - Radionuclides Air Release Site

6. Page 5-82: Site history indicates that the area is highly industrialized with soils that has been disturbed. The report shall indicate whether soils in sampled areas have been disturbed and/or replaced after 1979, the date at which several thousand curies of tritium were emitted from the facility stack. Of the 11 locations sampled, were only two samples (35-2078, 35-2070) from undisturbed areas? If so, the 10 other samples appear to present results that are not representative of potential soil contamination. (BPJ)

PRS 35-014(b) - Leak of Dielectric-Oil-Containing PCB

7. Because some of the QA/QC problems associated with this investigation, such as: the EQLs exceeded their corresponding SALs; some hydrocarbon contaminations were not resolved by the analytical laboratory; EQLs for SVOC analysis to be elevated by greater than a factor of 10...etc. The investigation is inconclusive. LANL must resolve the above problems and re-investigate the site. (BPJ)
8. If the asphalt surface has been replaced since the PCB leak, there is a possibility that PCB runoff occurred in a direction other than the current drainage path (5.13.2). LANL shall sample around the perimeter of the paved area. As the report states, the extent of contamination has not been precisely determined; an NFA is not suitable for this PRS until further analysis is made. (BPJ)

PRSS 35-014(e₂) and 35-016(i) - Oil Spill Site and Active Storm-Water Outfall

9. Page 5-98, Table 5.14.5-1: The surface soil at location ID 35-2165 contains zinc four times higher than its background UTL. LANL shall perform more subsurface samples at this location in one-foot interval until zinc concentrations below the background UTL. (BPJ)