



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

5/22/97
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July 22, 1997



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

RE: Review of LANL Response to the NOD of RCRA RFI Report for
PRSS in TA 35, EPA I.D. No. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed the
NOD Response dated April 18, 1997, concerning Los Alamos National
Laboratory (LANL) RCRA RFI Report for Potential Release Sites
(PRSS) in Technical Area 35 and considers the Response to be
deficient. Enclosed are the deficiencies for your review.

If you have any questions or need additional information,
please contact 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

HowA LANL 7/11/97/35



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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)

**NOD COMMENTS PERTAINING TO LANL NOD RESPONSE TO
THE RFI REPORT FOR PRSs IN TA 35**

1. **PRSs. 35-003(j and k), 35-014(a, b, and d), and 35-015(b) - LANL Response to NOD, Nos. 1, 2, 3, 6, and 7**

LANL plans to resample those sites and a SAP will be submitted to NMED. Please specify the date of submission.

2. **PRS 35-009(d) - LANL Response to NOD, No. 4**

LANL should indicate in the RFI report that septic tank was the subject of a voluntary corrective action (VCA) and the purpose of the water sample. The analytical result of water sample shall be included in the VCA Completion Report for PRSs 35-009(b, c, and d). NFA decision for this site is pending until NMED has completed review and approval of the VCA Completion Report.

3. **PRSs 35-014(e₂) and 35-016(I) - LANL Response to NOD, No. 9**

LANL shall re-investigate Sample Location ID. 35-2165, and delineate the extent of contamination based on the following reasons:

1. Zinc concentration exceeded its UTL several folded,
2. Several other inorganics (Mn, Mi, Pb, and Ti) also exceeded their respective UTLs, and
3. The sample was taken from 0 to 6 in. deep soil. Contaminants could have been percolated down to the subsurface. LANL has not delineated the vertical extent of contamination.

Therefore, LANL must sample the location in one-foot interval until the concentrations of all above-mentioned metals below the background UTL.