



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

March 24, 1999

*Site stop -
John K -
Please forward these comments
to me by 4/30/99 or forward to EPA
with retroactive by the same date.
Brydo
2/20/99*



HSWA LANL 4/1129/35

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

**RE: Review Comments of the LANL RCRA RFI Report for PRSs 35-003(a, b, c, and n), LA-UR-98-3825, EM/ER:98-395
EPA I.D. No. NM0890010515**

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a technical review of the Los Alamos National Laboratory (LANL) RCRA RFI Report for Potential Release Sites (PRSs) 35-003 (a, b, c, and n) in Technical Area 35, dated September 30, 1998, and has found the Report to be deficient. Enclosed is a Request for Supplemental Information.

The investigation was conducted according to "the LANL Voluntary Corrective Action Plan for Potential Release Sites 35-003(a), 35-003(b), 35-003(c), and 35-003(n)" (LANL 1996, ER ID 53733) instead of the EPA approved work plan, "RFI Work Plan for Operable Unit 1129" (LANL 1992, ER ID 07666). The VCA Plan was not reviewed or approved by either NMED or EPA.

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 and Federal
Facilities Section



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**REQUEST OF SUPPLEMENT INFORMATION
LOS ALAMOS NATIONAL LABORATORY (LANL)
RFI REPORT FOR PRSs IN TA-35**

GENERAL COMMENTS

1. The investigation did not follow the EPA approved work plan, "RFI Work Plan for Operable Unit 1129" (LANL 1992, ER ID 07666), but LANL's VCA Plan, which was not reviewed or approved by either EPA or NMED.

None of the sample locations conducted in this investigation are compatible with the proposed sample locations in the work plan. LANL did not sample the former Phase Separator Pit (PSP) as was planned in the Work Plan. Was the soil in the area where the original sample locations excavated and removed? Was the soil excavated to the same depth indicated in the work plan? LANL should explain why sampling is not necessary at the PSP site. (**Best professional Judgement, (BPJ)**)

2. The investigation emphasized the east side of Phase Separator Pit; no sample was collected from the west side of the PSP. Please explain. (**BPJ**)

SITE-SPECIFIC COMMENTS

Section 2.2.1 Site Description

1. Page 2-2, the 2nd paragraph of the Report: It states, "PRSs 35-003(a, b, and c) are the former sites of three underground **stainless steel** holding tanks, structure Nos. TA-35-4, -5, and -6, ...Each of these holding tanks was about 5 ft in diameter and 9 ft tall, with a **1,300-gal.** capacity."

Page 3-76, the 4th paragraph of the RFI Work Plan for Operable Unit 1129: It states, "The phase separator pit (TA-35-3; SWMU No. 35-003[n]) and three **600-gal. concrete** storage vaults (TA-35-4, -5, -6; SWMU No. 35-003[a, b, and

c], ...".

Page 7-35, the last paragraph of the RFI Work Plan: It states, "This site consists of the phase separator pit (SWMU No. 35-003[n]) and three **600 gal. reinforced-concrete** underground storage tanks (USTs) (SWMU Nos. 35-003a, b, and c)." Please clarify which version of descriptions is correct. **(BPJ)**

Section 2.3.4.3 - Data Review, Description of RFI Data

2. Page 2-21: Four inorganic chemicals (antimony, cadmium, silver, thallium) are specified as being linked to detection limits that exceeded relative background values. What efforts were made to address this concern? **(BPJ)**