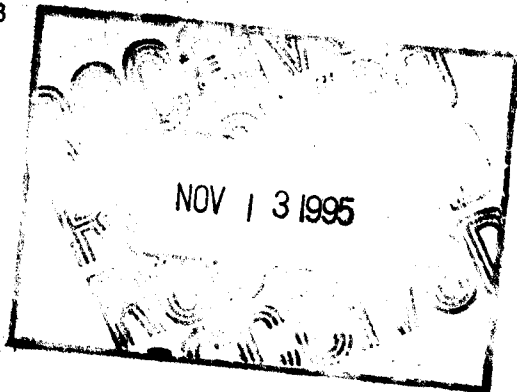




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

NOV 07 1995



Mr. Theodore J. Taylor  
Program Manager  
Department of Energy  
Los Alamos Area Office  
Los Alamos, NM 87544

Re: RFI Report for SWMU 36-002  
Los Alamos National Laboratory (NM0890010515)

Dear Mr. Taylor:

The Environmental Protection Agency (EPA) has reviewed the RFI Report dated July 14, 1995, for Technical Area 36, solid waste management unit 36-002. Enclosed are several comments concerning the quality of the report and the sampling and analysis conducted at this site. Los Alamos National Laboratory (LANL) needs to respond to the concerns issued in comment number two within thirty days of receipt of this letter. LANL may request a Class 3 permit modification for this unit.

Should you have any questions, please feel free to contact Ms. Barbara Driscoll at (214) 665-7441.

Sincerely,

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

Enclosure

cc: Mr. Benito Garcia  
New Mexico Environment Department  
Mr. Jorg Jansen  
Los Alamos National Laboratory, MS M992



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T2

**Comments**  
**RFI Report Technical Area 36**  
**Los Alamos National Laboratory**

1. Figure 1-4 : The figure for the sump should fill this entire page which would allow for clearly indicating where sample locations were taken. A cross-sectionally view should also be provided indicating the depth of samples.

2. EPA has not approved the HE analytical method used for this site, USTHAMA LW12. EPA SW-846 Method 8330 is the approved method, and has gone through rigorous peer review, use and testing by multiple laboratories to be approved. LANL should be using this method for all HE analysis for which the method is appropriate, unless there was a form of HE used at the site such as PETN for which the method does not apply. Use of other than the approved methods for analysis may result in resampling and analysis. LANL needs to provide an explanation for using this alternative method without prior EPA approval.

3. EPA is not commenting on the UTL, human health risk or ecological risk assessments described in this report. These comments have already been provided in numerous documents, and the approaches used in this report are not approved.