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rec'd 12/5/95

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
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NOV 28 1995

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



Re: RFI Report for Technical Area 36
Los Alamos National Laboratory

Dear Mr. Taylor:

The Environmental Protection Agency (EPA) has reviewed the RFI Report for Technical Area 36 and found it to be deficient. Los Alamos National Laboratory (LANL) shall have ninety (90) days from the date of this letter to respond to the attached list of deficiencies. EPA would have been able to lessen the number of deficiencies if information had been presented in a useable and thorough manner. Recommendations made by LANL could not be concurred with due to a lack of information presented in the report.

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

Sincerely,

David W. Neleigh

for

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

Enclosure

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



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List of Deficiencies
RFI Report for Technical Area 36
Los Alamos National Laboratory

General Comment:

1. The format used for this report did not follow guidance from EPA. It is preferable to discuss the details for each solid waste management unit (SWMU) in full.
2. The calculation of the upper tolerance limits and the approach to ecological risk screening should follow the guidance given the Los Alamos National Laboratory (LANL) by EPA in the September 1995, meeting.
3. Figures should be presented which indicate all the sample location numbers so these may be correlated with sampling results.
4. Data comparison tables represent information based on analyte. A much better and preferred presentation of data is by sampling location, so that all the potential contaminants for a location may be identified at one glance.
5. A synopsis of the sampling proposed in the RFI work plan should be included in the report. This should include a review of the laboratory analysis conducted.
6. Sampling plans in this RFI report are using the high explosive (HE) field test kit inappropriately. This kit should be used in determining areas which are highly HE contaminated. It is not to be used for eliminating samples from analysis by EPA SW 846 method 8330. The test kit detection levels are not adequate for eliminating sites from HE analysis. If HE is a potential contaminant then a set number of samples should be submitted for laboratory analysis of HE (SW 846 method 8330).

Specific Comments:

1. **4.1 PRS 36-003(a), p. 4-1 through 4-5 -** Insufficient information is presented in regards to the sampling conducted at the drainfield for this site. In addition, there should be a figure which indicates sample locations and depths. EPA understands that LANL may choose to present a remediation plan for the septic tank; however, these site will not be completed until all the components of the septic system have been addressed. Based on results from the drainfield the seepage pit should also be sampled.
2. **4.2.2 Field Investigation, SWMU 36-003(b) -** LANL indicates that the actual outfall could not be located. Figure 1-8 indicates a potential location for the outfall which appears to drain to an area other than the area for which surface samples were collected. Therefore, it does not appear that

LANL sampled in the correct area to determine if a release occurred from the outfall. LANL should provide additional information regarding how the sampling locations for the outfall were determined and why no samples were collected closer to the area where the outfall was projected to have occurred.

3. **4.3.3 Conclusions and Recommendations, SWMU 36-005, p. 4-13-**
It is difficult to evaluate the results of this sampling when no figure is provided which has sampling locations. The VOC levels found are very low and probably limited additional sampling is required. In addition, Appendix B which is a sampling plan for this SWMU should have been mentioned under this Section (4.3.3).
4. **C-36-003, Table 4-7, p. 4-19 -** A screening action level should be available for Chromium.
5. **4.4.3 Conclusions and Recommendations, C-36-003, p. 4-16 -**
It is difficult to correlate analytical results with Figure 1-10. A more detailed figure should be provided for samples located at the outfall. It appears that sample location 36-3108 is in several locations while these are probably duplicate samples.
6. **Appendix A, C-36-003, p. A-176 -** An examination of the results from the water sample indicate that antimony and thallium are above the action levels for water. Are these results being used for the NPDES permit? These results should be discussed in the RFI report. Also, data is poorly organized within the Appendix. For example, for PRS C-36-003, Location ID 36-3108, on page A-176, results are jumbled for each sample ID, whereas all the results from one sample ID should be together.

Appendix B

7. **B.1.3 Sampling, PRS 36-005 -** Is LANL collecting enough samples to support a risk assessment? If field screening is positive for organic vapors a sample will be collected every foot until field screening indicates negative for vapors, and the last sample will be submitted for analysis. LANL should also submit the last positive field screen sample for analysis.
8. **Table B-1, p. B-4 -** High explosives are potential contaminants at this site, and as EPA has previously indicated the HE spot test kit does not have a detection level sufficient to eliminate samples from HE analysis using SW 846 method 8330. LANL should provide information related to the HE results from the first sampling.

9. **B.2.3 Soil and Sediment Sampling Plan, SWMU C-36-003 -**
Location 36-3112 is not indicated on Figure B-2.

10. **Table B-2 -** This table indicates that the six sampling locations which are to be field screened for PCBs will also have laboratory analysis for PCBs, VOC, metals, and SVOCs. Text is unclear on this analysis.