



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

December 22, 1997



cc: JTD  
DEC 23 1997

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

Re: NOD Comments on the Supplemental Information to the  
Voluntary Corrective Action (VCA) Completion Report for PRS  
36-003(b), Los Alamos National Laboratory (LANL), EPA I.D.  
NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed  
LANL's Supplemental Information to the VCA Report for PRS 36-  
003(b), dated December 5, 1997, and has found the Report to be  
deficient. Enclosed are a list of deficiencies for your review.

Should you have any questions, please feel free to contact  
Mr. Rich Mayer at (214) 665-7442.

Sincerely,

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

Enclosure



2348

74

**NOD Comments on the Supplemental Information to the Voluntary  
Corrective Action Completion Report for PRS 36-003(b)**

**General Comment on the Response:** EPA considers the sampling performed downgradient of the outfall pipe as a Phase I event. Deeper soil samples are needed to confidently say that there is no vertical contamination. VOCs probably would not "show up" in the 0-6 inch samples. If VOCs exist, they will most likely "show up" in deeper soil intervals. Therefore, even if the 0-6 inch soil samples taken in the Phase I event show no contamination, EPA will require deeper soil sampling.

**Page A-73 of the Response; Appendix A:** Sample ID AAB1886, at sample location 36-3104 had a copper concentration of 308 mg/kg in the 0-6 inch soil sample. If this number is correct, a deeper soil sample must be taken at 36-3104. Please clarify.

**Page A-85 of Response; Appendix A:** Sample ID AAB1889, at sample location 36-3107, contains several hazardous constituents above SAL values or above the analytical detection limit. Are the decimal places missing on these results? For example, for Benzo(a)pyrene the concentration result was 034 mg/kg and the SAL value is .1 mg/kg. Please clarify.

**Figure 1-8 of the Response; Appendix B:** In the approved RFI Workplan, LANL was supposed to have taken a soil sample near the end of the discharge pipe. In actuality, the first soil sample taken was about fifty feet downgradient from the discharge pipe. This sample location doesn't meet EPA's meaning of "near", which is no more than 5 feet downgradient from the discharge pipe.

**Notes to NMED**

EPA has no problems about the investigation of the septic tank. However, EPA does have a problem with the soil sampling performed downgradient of the outfall pipe. EPA has two problems with the investigation. They are: 1) The nearest sample taken to the outfall pipe was approximately 50 feet downgradient, which is unacceptable; and, 2) the soil samples taken only went to 6 inches in depth, which is also unacceptable.

Also, after further analysis, EPA recommends that NMED not issue a NOD letter but send out a letter requiring that LANL perform deeper soil samples at the same locations, except that the nearest sample downgradient of the outfall pipe be within 5 feet of the pipe, not fifty feet as in the phase I sample location. EPA feels that this would be the most efficient approach.