



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

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Please forward
to LANH/DOE by
3/20/98
revised to EPA
by same date w/
rationale from to
2/17/98

FEB 11 1998

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



FEB 11 1998

Re: Comments on the Supplemental Information for the RCRA
Facility Investigation Report (RFI) for TA-36, PRSS 36-
003(a-b), 36-005, and C36-003, Los Alamos National
Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed
LANL's Supplemental Information for the RFI Report for TA-36,
dated November 15, 1997, and has found the Report to be generally
complete. However, EPA disagrees with some of LANL's conclusions
and recommendations included in the Report. Also, EPA believes
that additional sampling is needed at most of the PRSS. Enclosed
are EPA's comments and recommendations regarding each PRS.

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

Sincerely,

[Handwritten signature]

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

Enclosure



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NSDA LANL 2/11/30/36

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Comments on the Supplemental Information for the TA-36 RFI Report

General Comment on PRSs 36-003(a): The analytical results (found in the attached ECC Report) from the confirmatory soil samples taken underneath the septic tank did not include the following constituents: arsenic, cadmium, silver, mercury and cyanide. Please provide them.

Also, LANL must investigate the seepage pit (50 ft. deep and 4 ft. in diameter) that received waste from the septic tank from 1973 to 1988. LANL mentions in the attached ECC Report that the seepage pit has not been found. The logic used by LANL not to investigate the seepage pit is that soil samples taken underneath the septic tank drainfield will be representative of the contamination found underneath the seepage pit. EPA disagrees.

In summary, for EPA to agree to a no further action determination for this PRS: 1) LANL must investigate the seepage pit with the results being acceptable to EPA; and, 2) provide the analytical results for the confirmatory soil sampling underneath the septic tank, with the results being acceptable to EPA.

General Comment on PRSs 36-003(b): Since there has already been a Voluntary Corrective Action (VCA) performed on this PRS, with a separate VCA Completion Report submitted to and reviewed by EPA, this PRS may be handled separately. However, LANL needs to make sure that all information is included in this Report, so that EPA can make a determination on this PRS. EPA has noted, that in the past, VCA Completion Reports have not included the necessary information to make a decision.

Page 3; LANL Response to Specific Comment No.3: The initial sampling that LANL conducted on SWMU 36-005 was flawed from the beginning. VOC contamination in surface soils (0-6 inches) will most likely not be detected or be detected at low concentrations, since volatilization and photodegradation will occur. Secondly, common sense would tell you that if there had been spills, leaks, etc. from this site, it is very likely that contaminants (VOCs, SVOCs, and inorganics) would migrate deeper than six inches. Therefore, the Phase I sampling was only useful for determining the nature for most constituents, not the extent of contamination. When LANL proposed the sampling plan they were well aware that deeper sampling would be needed to obtain a NFA determination. LANL is trying to "shortcut" the investigation process.

LANL mentions later in the response that they have already done additional Phase I sampling (March 1997) for VOCs only, most samples ranged from 12-22 inches in depth. However, they did not submit the results with the Supplemental Information. LANL

mentions that the results will be submitted sometime 1998.

In summary, this reviewer recommends the following for PRS 36-005: 1) All results (including screening and boring logs info) of the March 1997 sampling event needs to be submitted; and, 2) deeper vertical sampling needs to be performed for inorganics, SVOCs, and explosives. 0-6 inch sampling is not acceptable for a NFA determination, the public might question the technical adequacy of using such a shallow sampling approach. **NOTE to NMED: The above recommendations should be final with no negotiations.**

Page 4; LANL Response to Specific Comment No.4b: Please specify a date in which the Phase II Sampling and Analysis Plan for PRS C-36-003 will be submitted to NMED.