



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

JUL 17 1996

Mr. Benito Garcia, Chief
Hazardous and Radioactive
Materials Bureau
New Mexico Environment Department
2044A Galisteo Street
Santa Fe, NM 87502



Re: Approval of RFI Report for Technical Area 39
Los Alamos National Laboratory (NM0890010515)

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed the NOD Response dated April 2, 1996, for RFI Report on Technical Area 39 at Los Alamos National Laboratory. EPA recommends approval of this RFI Report with modifications as completion of Phase I sampling.

The approved RFI Report shall consist of the RFI Report dated April 28, 1995, the NOD Response dated April 2, 1996, as well as the enclosed list of modifications and recommendations. Enclosed is a discussion of each site detailed in the RFI Report along with a recommendation for that site. Many of the sites will require Phase II sampling, and several of the sites are recommended to be added to the HSWA portion of the permit.

Should you require additional information, please feel free to contact Ms. Barbara Driscoll at (214) 665-7441.

Sincerely,


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

Enclosure



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**Recommendations and Modifications
RFI Report for Technical Area 39
Los Alamos National Laboratory**

This RFI Report contained information on the following sites: 39-002(a-f), 39-005, 39-006(a), and 39-007(a and d). Unless otherwise noted, all comments are considered best professional judgement.

Modifications:

1. Ecological risk assessments for all sites will need to be reevaluated when an eco-zone approach has been agreed to by NMED.
2. The polychlorinated biphenyl (PCB) guidance on page 7-3 is inaccurate and does not represent the Environmental Protection Agency's position on the cleanup of PCBs. Depending on site-specific considerations, the Regional Administrator may determine that a different cleanup level is more protective than those discussed. EPA Region 6 has a policy of requiring cleanup of PCBs in any drainage areas or areas leading to surface water of 1 part per million in soil. Official notification of PCB cleanups should also be made to the Toxic Substance Control Act (TSCA) personnel.

Letter: EPA Comments on Draft LANL Guidance, Cleanup of Polychlorinated Biphenyls dated May 8, 1995, and EPA letter dated September 20, 1995, PCB Spill Cleanup Policy.

3. LANL needs to provide a schedule for work plan submittal, fieldwork and projected RFI Report dates for sites which will require additional characterization.

Following are recommendations for each site:

4. **39-002(a): Satellite Storage Area:** LANL recommends an expedited cleanup for this site. Additional sampling is needed to characterize the extent of contamination prior to finalization of a cleanup plan.
5. **39-002(b): Satellite Storage Area:** EPA does not concur with combining this site with 39-004(c) until decommissioning. PCBs were found in two samples in drainage at levels well in excess of 1 mg/kg. LANL should proceed with plans for extra characterization of this area and to remove material containing PCBs in excess of 1 ppm from the drainage and provide a plan for this cleanup. This site should be added to the HSWA portion of the RCRA permit.

6. **39-002(c): Storage Area:** Additional characterization and removal of the source of contaminants is appropriate for this site. LANL must reevaluate the multiple constituent evaluation for all PAHs which were above SALs. This site should be added to the HSWA portion of the RCRA permit.
7. **39-002(d): Storage Area:** Beryllium and Uranium were found above SALs. LANL recommends combining this site with 39-004(d) which is currently on the HSWA permit. LANL needs to specifically respond to each of the questions asked in deficiency #19. It is not acceptable to respond see the work plan. Additional characterization appears appropriate at this site and a further determination of combining this site with 39-004(d) or adding this site to the permit will be based in part on information supplied in response to the deficiency questions.
8. **39-002(e): Storage Area:** LANL needs to respond to deficiency #21. LANL has not provided additional justification for the selection of sampling locations, and additional sampling appears appropriate.
9. **39-002(f): Storage Area:** The presence of copper detected at 3200 mg/kg (Screening Action Level is 200 mg/kg) indicates that additional characterization is needed for this site. The extent of contamination needs to be defined. This site should also be added to the permit. The presence of high levels of copper may be especially significant in an ecological risk assessment.
10. **39-007(a): Storage Area:** This site underwent a voluntary corrective action for PCBs which will need to be reviewed prior to a recommendation being made for this site.
11. **39-007(d): Storage Area:** This site does not need to be added to the HSWA portion of the permit. Recommend no further action.
12. **39-006(a): Septic Tank System, Sand Filters and Outfall:** The following recommendations are made:
 - a. Additional sampling is required in the active septic tank as agreed to in the NOD Response.
 - b. LANL proposes removal of the inactive septic tank and sampling around the tank.
 - c. The PCBs found in the inactive septic tank at a depth of 6 feet were at concentrations around 4.4 ppm which indicates that contaminants may have been driven deeper than suspected by LANL. LANL need to drill some deeper

boreholes in both sand filters and collect samples starting at the 6 foot interval through the fifteen foot interval with analysis every three feet. Samples should be analyzed for metals and PCBs.

d. While little contamination was found in the boreholes drilled outside the chemical seepage pit, LANL proposes removing the pit. LANL does not believe that the areas of maximum contamination may have been detected in sampling.

13. 39-005: High Explosives Seepage Pit: No further action under Criterion 3: No release to the environment has occurred, nor is likely to occur in the future.