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Mark E. Weidler
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March 27, 1995



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Barbara Driscoll
 RCRA Permits Branch (6H-PN)
 U.S. Environmental Protection Agency, Region VI
 1445 Ross Avenue, Suite 1200
 Dallas, Texas 75202-2733

Dear Ms. *Barbara* Driscoll:

RE: **NMED Comments Regarding SWMU 42-003 and Proposed Guidance for Evaluation and Cleanup of Polychlorinated Biphenyls (PCB) at Los Alamos National Laboratory (LANL)**

Attached are the Hazardous and Radioactive Materials Bureau's (HRMB) comments related to the following two LANL documents:

1. "Response to Concerns Related to Solid Waste Management Unit (SWMU) 42-003"; March 8, 1995.
2. "Guidance for Evaluation and Cleanup of Polychlorinated Biphenyls (PCBs)"; February 22, 1995.

The first document above is commented upon in HRMB's Attachment 1; the second document above is commented upon in HRMB's Attachment 2.

If you have any questions or concerns regarding this matter, please contact me at (505) 827-4308.

Sincerely,

Ronald Kern, Technical Compliance Program Manager
 Hazardous and Radioactive Materials Bureau

cc: (w/o attachments)

Benito Garcia, Chief, HRMB
 Barbara Hoditschek, Program Manager, HRMB



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ATTACHMENT 1

The following comments from HRMB relate to the March 8, 1995 document "Response to Concerns Related to Solid Waste Management Unit (SWMU) 42-003", submitted to EPA Region VI by LANL.

1. Page 1, Bullet 1: **Polyaromatic hydrocarbons, which are common constituents in paving materials (asphalt) and roofing tar (coal tar pitch), were found in the fill materials...**

LANL should provide information as to whether paving material or roofing tar have been or are actually present within the fill materials.

2. Page 1, Bullet 2: **Bis(2-ethylhexyl)phthalate was detected at 780 mg/kg, which is well below the screening action level (SAL) of 50,000 mg/kg.**

The attached SVOC results for SWMU 42-003 indicated a result for Bis(2-ethylhexyl)phthalate of 780 ug/kg and a SAL of 50,000 ug/kg. LANL should clarify the units of the analytical data.

3. Page 2, Paragraph 1: **The amount of methylene chloride detected in the laboratory blanks was approximately 100 mg/L.**

This concentration of methylene chloride is very high for high for a blank and suggests a problem with the analytical laboratory. LANL should clarify this concentration by including the QA/QC data with the environmental analytical data.

4. Page 2, Paragraph 2: **Samples were analyzed for metals using the toxicity characteristic leaching procedure (TCLP).**

TCLP is a method to determine if a waste exhibits the toxicity characteristic and is therefore a hazardous waste. It is not appropriate to determine a total concentration of a particular metal using TCLP data.

ATTACHMENT 2

The following comments from HRMB relate to the February 22, 1995, final draft, position document "Guidance for Evaluation and Cleanup of Polychlorinated Biphenyls (PCBs)", submitted to EPA Region VI by LANL.

1. Page 2, Section 3.1, Paragraph 2: TSCA PCB spill cleanup regulations apply to spills that occurred on or after May 4, 1987, the effective date of the regulation.

How will LANL decide whether the PCB contamination at a particular site is the result of a release or spill prior to May 4, 1987?

2. General Comment to Section 4:

LANL is proposing to implement updated SALs and Cleanup Goals for both residential and industrial land use at sites with only PCBs, as well as at multiple constituent sites. PCBs are identified as hazardous constituents in 40 CFR 261, Appendix VIII. PCBs are also a hazardous constituent discussed in Subpart S guidance, and a conservative health-based action level is calculated. PCBs are also a constituent for which EPA Region III has calculated Risk-based Concentrations (RBC).

Although TSCA has set "cleanup standards" for PCBs based upon land usage, HRMB is concerned about the "protectiveness of health and the environment" because the example Subpart S health-based action level and the EPA Region III RBC (Residential Soil) are both more conservative than the most conservative TSCA PCB standard. For screening purposes, HRMB recommends retaining the RCRA guidance standards found either in Subpart S or EPA Region III RBC guidance.

HRMB questions the validity of a PCB SAL where the contaminants of concern (COC) include PCBs and other hazardous constituents (i.e. multiple constituents).

Additionally, HRMB questions the validity of setting a PCB cleanup goal at sites with multiple COCs. Remediation or cleanup goals at sites with multiple constituents should be determined via a risk assessment process.