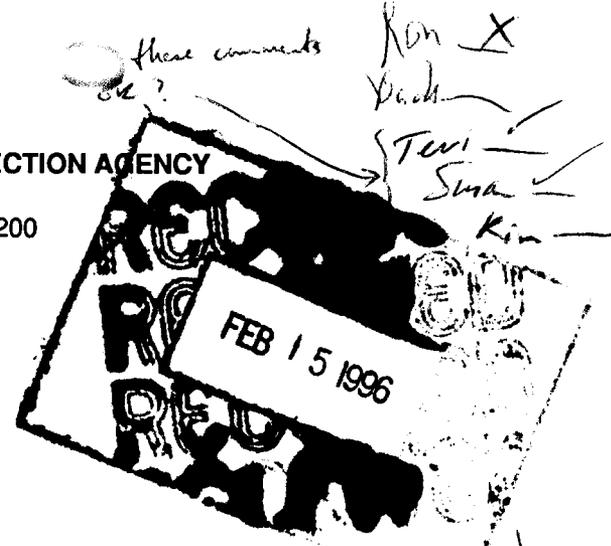




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

FFB 1 3 1996



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

**Re: Notice of Deficiency RFI Report for Technical Area 42
Los Alamos National Laboratory (NM0890010515)**

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed the Los Alamos National Laboratory (LANL) RCRA Facility Investigation (RFI) Report for Technical Area 42 received October 6, 1995, and found it to be deficient. Enclosed is a list of deficiencies which EPA recommends that LANL respond to within sixty days of transmittal from the New Mexico Environment Department.

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

Sincerely,

W. Neleigh

for

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

Enclosure

*F. P. New
1079-1129
6*

*EPA is reviewing
the deficiencies
in the report*



2519

4/11/97/42

TC

List of Deficiencies
RFI Report for Technical Area 42
Received October 6, 1995
Los Alamos National Laboratory

Below are comments on the Los Alamos National Laboratory RCRA Facility Investigation (RFI) Report for Potential Release Sites 42-001(a), 42-001(b), 42-001(c), 42-002(a), 42-002(b), and 42-003 located in Operable Unit 1129 at former Technical Area 42.

1. **3.0 Approach to Data Assessment and Analysis, p. 12 -** To sample only for predetermined contaminants of potential concern (COPCs) creates the appearance that a complete investigation has not been conducted. For wide spread areas of contamination, analysis for indicator compounds can be justified for determining extent of contamination, but only after representative samples, analyzed for "full scan" organics and inorganics, have been evaluated for risk assessment purposes. EPA still has concerns about a reduction in analysis based on toxicity characteristic leaching process (TCLP) data.
2. **4.1 Aggregate J, p. 23 -** Wastes and debris which were generated from the decommissioning of the incinerator, associated equipment in the control building and the septic tank were apparently sampled for radionuclides, prior to disposal in trenches at TA-54. Was any confirmation sampling for organics and inorganics conducted in the area from which the contaminated material was removed or of the waste and debris prior to disposal ?
3. **Table 4, p. 25 -** Table 4 identifies a sample depth of 0-5 feet for "near surface" sampling at former TA-42. How can a five foot sample interval be considered representative of a "near surface" sample even under so called "reconnaissance" circumstances ? If this information was the basis of the RFI sampling plan, as stated in Section 4.1.1.2 (Page 24), the results presented in the report could be deficient and the conclusions based on that data could be seriously flawed.
4. **4.1.2 Field Investigation, p. 29 -** Unless samples of the fill material are available from the time it was placed, it is inappropriate that the top ten feet of material is "assumed to be clean" as the report suggests. Confirmation sampling of the fill material should be conducted to validate this assumption.
5. **4.1.2.2 Results of Field Screening, p. 32 -**
 - a. An explanation should be provided to describe why an "uncertainty in the analytical results" is an adequate basis to discount downwind air sample results which are higher than upwind concentrations.

b. If the OVA detected organic vapors in the borehole and drill cuttings it cannot be assumed that the vapors are the result of the drill rig being located upwind from the sample location or a high moisture content in the sample, as the report suggests. The report states that the OVA recorded hits in the borehole and in several sections of the split spoon sampler and not in the breathing zone. This is directly opposite of what would normally occur if the sampling zone was being impacted by vapors from a drill rig being located upwind. Furthermore, Table 5 identifies two samples containing organic compounds (PF-ST-15, PF-PLN-0), although the table attempts to discount these hits as asphalt or roofing tar, rather than report the analysis. The analytical results should be presented as found and a determination on there potential impacts should be made based on a historical review of the origin of the fill material. These analytical results further substantiate the previous comment that the fill material cannot be "assumed to be clean".

6. **4.1.3.1 Comparison with Human Health Screening Action Levels, p. 35** - The report states that five sample locations near the incinerator, with depths ranging from surface to 3 feet, were analyzed for lead using EDXRF. The report indicates that no potential COCs were identified at these locations. Was the surface to 3 feet sample interval a composite sample or were discreet samples taken within the interval?

discreet?