



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

*Step h  
Please forward  
to LANL/DOE by  
3/27/98 re: conc'd  
to EPA by some date  
w/attached  
2/23/98*

FEB 17 1998

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



Re: Comments on the Addendum to the RCRA Facility Investigation  
Report (RFI) for TA-48, PRSS 48-002(e) and 48-007(b,c,f),  
Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed  
LANL's Addendum to the RFI Report for TA-48, dated September 22,  
1997, and has additional comments regarding the Report. In the  
Addendum cover letter, LANL requested a formal acknowledgement  
from NMED on the status of PRSS 48-002(e) and 48-007(b,c,f). At  
this time, EPA cannot recommend a No Further Action determination  
for PRSS 48-002(e) and 48-007(b,c,f). Enclosed are EPA's  
comments and recommendations regarding the above mentioned PRSS.

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

Sincerely,

*Rich Mayer*

*for*

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

Enclosure



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HSWA LANL 4/1129/48

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**Comments on the Addendum to the RFI Report  
for TA-48, PRSs 48-002(e) and 48-007(b,c,f)**

While reviewing the Addendum, EPA also had to review the original RFI Report, dated May 6, 1996. Some of the below comments are from the review of the original RFI Report.

**PRS48-002(e), Container Storage**

**Page 5-1 of Addendum; Description:** Please clarify the following questions: 1) What was the approximate size of PRS 48-002 and is most of the unit now located under asphalt?; and, 2) When the unit was in use, were the containers stored on the ground or on some type of pavement? Also, please provide the preliminary 1990 investigation results. EPA cannot make a decision on this PRS until the above information is answered.

**48-007(b,c,f), Effluent Discharges**

**Page B-4; Table B-23 of the RFI Report, May 6, 1996:** The inorganic results (lab analytical results) for PRS 48-007(c) from 0-.5 ft and 1.5 - 2.5 ft. were not included. Also, the inorganic results for all samples at PRS 48-007(b) were not included. The inorganic results for PRS 48-007(f) from 1.5 -2.5 ft. were not included. Please include these results.

**General Comment:** This reviewer questions the adequacy/quality of the investigation performed. Each outfall had one downgradient surface sample (0-6 inches) taken, 1 downgradient boring performed (total depth 2.5 feet), and one outfall (effluent) sample taken. When you consider that each outfall has an output of 36,000 gallons per year, taking two downgradient soil samples per outfall is not enough samples. EPA cannot, in good conscience, approve a NFA determination for these PRSs. EPA recommends that NMED require more soil sampling downgradient from each outfall.