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

February 24, 1998

ENTERED

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

RE: Review of the LANL VCA Completion Report for PRS 49-008(d), EPA I.D. No. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a technical review of the Los Alamos National Laboratory (LANL) RCRA Voluntary Corrective Action (VCA) Completion Report for cleanup activities in Technical Area (TA) -49, Potential Release Site (PRS) 49-008(d), dated November 13, 1997. The EPA has found parts of the Report to be deficient and enclosed is a list of deficiencies.

If you have any questions or need additional information, please contact Allen T. Chang of my staff at (214) 665-7541.

Sincerely yours,

for David W. Neleigh, Chief
New Mexico/Federal Facilities
Section

Enclosure

3987

LIST OF DEFICIENCIES
LANL VCA COMPLETION REPORT FOR
PRS 49-008(d)

1. Page 6, last paragraph: There are four identified hot spot locations. Please mark the locations of 49-9080 and 49-9082 in Figure 2.12-1. (**Best Professional Judgement, (BPJ)**)

2. Page 7, last paragraph: LANL states, "The work plan recommended taking four samples from the Bottle House floor where stained soil areas were located; however, only one stained area was visible, so the one sample was taken from that area."

   The Workplan states, "collection of discrete soil samples (at a depth of 0 to 6 in.) from the Bottle House floor and the discolored soil area for Level III analysis for radionuclides, metals, PCBs, and SVOC." (see page 6.6-8) LANL should collect all samples as required in the Workplan from both the discolored soil and the Bottle House floor. **(BPJ)**

3. Page 7, third paragraph: It states "Four samples from ..., one from the stained area and one from the Bottle House floor were also analyzed for PCBs. Table 2.1.2-1 summarizes the samples collected and analyses performed." The Bottle House floor PCB sample results are not reported in Table 2.1.2-1. Note in Table 2.1.2-1 list all of the Bottle House Area samples for PCB as NA (not analyzed). Please explain. **(BPJ)**

4. Page 8: The report states, "The four samples... collected around the edge of the cement floor. The work plan recommended collecting the samples under the facility; this task was not feasible because the floor of the entire facility consists of a thick concrete slab." Why did the work plan recommend sampling under the slab? LANL should provide environmental justification to change the approved work plan and environmental reasons for not sampling of the concrete slab and subsoil. **(BPJ)**

5. The report should discuss the PCB contamination and how the contamination relates to the PCB regulations. Page 14, first paragraph, fifth line states "No PCBs were positively reported in any sample at a concentration above the EQL, confirming the absence of PCBs at the site." The report does not define EQL or the measurement limit. Without the measurement limit and no units of measure related to PCB, the reviewer can not independently determine if the PCB

contamination is within limits to be protective of human health and the environment. **(BPJ)**

6. Pages A-1 and A-2, Section A.2: The discussion of PRSs 49-002 and 49-005(a) seems unrelated to the current report. Please explain why they are included in the report. **(BPJ)**

7. Page A-2, Section A.3 Organic Analyses: The subtitle is "PRSs 49-002 and 49-005(a), Area 10.". However, the discussion is about the sample (0549-95-0015) collected from 49-008(d), Area 12. Please explain. **(BPJ)**

8. Page A-2, Section A.3 Organic Analyses: It states, "Samples 549-95-0289 and 0549-95-0015 required additional dilution because of the presence of hydrocarbons in the samples... Sample 0549-95-0015 was collected from a highly oil-stained area on the dirt floor of the Bottle House. The presence of this hydrocarbon in the sample required the sample extract to be diluted."

   What are the hydrocarbons and what are their concentration levels? If a sample extract requires further dilution, does this mean that the result could be underestimated under the given dilution, and may be no longer accurate? **(BPJ)**