



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

FILE LANL HSWA  
F057250

*Steve -  
evaluate for  
response  
B14*

JUN 10 1996



Mr. Benito Garcia, Chief  
Hazardous and Radioactive  
Materials Bureau  
New Mexico Environment Department  
P.O. Box 26110  
Santa Fe, NM 87502

**Re: RFI Report for Technical Area 50  
Los Alamos National Laboratory (NM0890010515)**

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed the Los Alamos National Laboratory (LANL) RCRA Facility Investigation Report for Technical Area 50 dated March 1, 1996, and found it to be deficient. Enclosed is a list of deficiencies for which EPA recommends that LANL be allowed ninety days to respond.

Should you have any questions, please feel free to contact Mr. Scott Ellinger at (214) 665-8408.

Sincerely,

*David W. Neligh*  
David W. Neligh, Chief  
New Mexico and Federal  
Facilities Section

Enclosure



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**List of Deficiencies  
RFI Report for Technical Area 50  
Los Alamos National Laboratory**

This report included information on the following sites: 50-004(a,c) and 50-011(a). Unless otherwise noted, all comments are considered best professional judgement.

LANL may request a Class 3 permit modification for SWMU 50-011(a) under No Further Action Criterion 5 (The potential release site has been characterized or remediated in accordance with current applicable state or federal regulations, and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use).

**Specific Comments:**

1. **SWMUs 50-004(a,c):** These two abandoned pipelines are known to have leaked during their history of operation, and this fact is reported in several different locations throughout the RFI Report. No other information is provided on the leaks. The report should state, if such information is available:

- (1) where along the pipelines the leaks occurred;
- (2) the length of time the pipelines were leaking;
- (3) the constituents passing through the pipelines at the time of the leaks.

The sampling and analysis program could have been much more thorough if this information had been available and considered. As reported, samples were collected from areas between buildings--as determined by accessibility, rather than by sampling the locations which incurred leaks.

2. **SWMUs 50-004(a,c):** A second issue with the pipeline sampling program is the depth from which the samples were taken. It is reported that samples were taken from the contact between the trench fill and the trench floor, but no deeper. The contact zone may be essentially flushed and contaminants percolated downward through the permeable soil/trench fill. LANL should provide additional sampling at a depth below the trench floor. This should be based on information where leaks may have occurred. A sampling plan should be submitted with the NOD Response to address this issue.