HSWA, LANL, FI-5/04 1147/TA-50/50-001(a) 50-004(a,c)

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

FEB 28 1997

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

Re: NOD Response for TA-50, SWMUs 50-004(a,c) and 50-011(a): Second NOD, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed the NOD Response dated November 26, 1996, concerning Los Alamos National Laboratory's (LANL) RFI Report for TA-50 solid waste management units 50-001(a,c) and 50-011(a) and considers the Response deficient. Enclosed are the deficiencies for your review.

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

Sincerely,

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

Enclosure

NOD Comments Pertaining to LANL's NOD Response to the RFI Report for TA-50, SWMUs 50-004(a,c) and 50-011(a)

General Comment: In the revised RFI Report, please include the following information for SWMUs 50-004(a & c) and 50-011(a): 1) the organic vapor readings and any associated notes (field screening) for each soil interval from each soil coring; 2) the field laboratory measurement results (especially for the volatile organics) for each soil interval from each soil coring; 3) the lithologic soil descriptions for each soil coring, which would include any noted visual or olfactory contamination. Best Professional Judgement

General Comment: In the revised RFI Report please include the following for SWMUs 50-004(a) and 50-011(a): 1) A table showing the metal, volatile, and semivolatile results for each soil interval analyzed. The table shall include the analytical method used for each "active" sample, and the detection limit for each sample analyzed. The background concentrations for metals and radioactivity shall also be included in this table. Best Professional Judgement.

Page 1-3 of the RFI Report; Section 1.2.1.1: This paragraph mentions that contaminated soil was removed where the pipe leaked, what was the approximate depth (or the depth range) of removal of these areas? Best Professional Judgement.

Page 5-2 of RFI Report; Table 5-1: This table indicates that soil sample AAC0258 was taken at .75-1.5 feet; sample AA0259 was taken at 1.5-3.0 feet; and, sample AAB6106 was taken at 3.5-4.25 feet. Previous pages in the report indicate that the trench was 5 to 6 feet in depth, were these samples taken erroneously or did the trench depth change in those locations? Please clarify in the revised RFI Report. Best Professional Judgement.

Page 5-9 of the RFI Report; Section 5.2.4: Corehole RDH-3 was not drilled. What alternative investigation technique is LANL planning to replace the corehole work? Also, sample borehole 50-023 was not performed due to overhead utility lines, can the sample location be moved to either side by 10-20 feet, without being affected by the overhead utility line? In addition, soil sample location 50-3024 was not found in Table 5-6. Please include it in the revised report. Best Professional Judgement.

Page 5-14; Page 5-14: Sample AAC0230 at the 6-7 foot interval was found to be almost 3 times the background concentration for lead. EPA recommends deeper sampling at this location. Best Professional Judgement.

Page 5-18; Table 5-9: Table 5-9 does not include the semivolatile results. Also, please include the analytical method used and the detection limit for each result. Best Professional Judgment.

Page 5-21; Field Investigation: Please include a larger scaled map of the decommissioned septic tank system showing the locations of the soil corings. Also, EPA disagrees with LANL's conclusion that the 45 degree corehole (as required in the approved workplan) which was supposed to intersect the 50 foot shaft is not needed. EPA will require this coring, although it may not be necessary for the coring to be at an 45 degree angle. It would appear that a boring placed next to the 50 foot "drywell" would be sufficient, provided that appropriate sampling intervals were included and that the boring went 55-60 feet in depth. Best Professional Judgement.

Internal Comments to NMED

General Comment: EPA's 2nd NOD comments were developed from reviewing both the RFI Report and LANL's NOD response to EPA's original NOD.

General Comment: Although this work plan was approved by EPA in March of 1993, this reviewer would like to point out a few concerns (weaknesses) regarding the work plan for SWMUS 50-004 (a,c). They are:

1) Only 1/3 of the soil samples collected were analyzed in the laboratory; and,

2) Soil samples extended only 1 foot in vertical depth from the bottom of the units.

This reviewer would recommend that in future sampling events most, if not all soil samples should be analyzed in the lab and that vertical soil samples (especially units that received liquid wastes) extend (at a minimum) 5 feet below the bottom of the unit.