



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

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MAY 08 2000

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

RE: Comments on the RFI Report for TA-54, LA-UR-00-1140, ER:19990003, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Bearzi:

The Environmental Protection Agency has reviewed LANL's RFI for TA-54 dated March 2000 and offers the enclosed comments for your review. As currently written, the Report is very difficult to follow, due to the sampling results being located in several separate sections of the Report. 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



HSWA LANL 5/1148/54

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Comments on LANL's RFI Report for TA-54

1. **General Comment:** The RFI Report needs to contain a table or list, for each MDA, of the SWMUs that have had liquid waste disposed in them (either directly into the ground/shafts or indirectly in barrels in pits or shafts). The information needed should include the estimated volumes (if known), the time frames and the types of hazardous constituents/radionuclides disposed of. For example, pit 2 had direct liquid waste disposal from 1960 to 1979, approximately 5,000 gallons per year, contains VOCs, PCBs, and tritium. This information is needed to fully understand the source areas for contamination and to see if monitoring is properly located. It would also be helpful in the remedy selection process.

In addition, it would be helpful if the maps included in the report were color coded (or some other designation) to identify the liquid waste sites since there are many SWMUs. Particularly, maps identifying the soil boring locations and soil gas monitoring locations.

2. **General Comment:** It appears that there has been several sampling campaigns performed at TA-54 in several media, but as currently written the report is difficult to follow. There needs to be a focused/organized presentation of the data in the Report. This reviewer has no problem with the narrative summaries of the sampling campaigns per media, but the sampling results and appropriate maps should follow the narrative. Having the sampling results in the Appendix does not lead to an efficient review of the report. This reviewer recommends the following for each MDA:
 1. Presentations in the report should be by media (soil/tuff-gas, surface water, soil, sediment/channel, subsurface soil, and ambient air) with a map of the MDA identifying the sampling locations with a Table presenting the results or summary of the sampling results. The Table should also include the background numbers and the soil screening numbers per constituent. Raw sampling results can be included in the Appendix. Also, if there has been several monitoring events, this information should also be included with a trend of the results over time. Also, the soil borings should be located in the section discussing the subsurface soil sampling results.
 2. For the soil-gas section, LANL should include plume concentration maps over time. Plume concentration maps should also be provided at different depths if possible.
3. **General Comment:** The report needs to include the inventories of organics and tritium at

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MDA G which were disposed. The table included in the RFI does not include those contaminants. This is important since certain organics and tritium have been found in subsurface gas plumes.

4. **General Comment:** Figure 3.3-1 needs to include the numerical designations for the surface water stations/sampling points.
5. **General Comment:** LANL has not addressed the issue of liquid wastes placed in drums which were placed in shafts/pits at the MDA's, especially MDA L. Is it feasible to remove wastes in barrels placed in shafts or in pits? LANL needs to address the feasibility of removing waste to limit soil-gas releases.
6. **General Comment:** LANL needs to provide a summary of the sampling results for each sampling event per media. Maximum contaminant concentration/range tables are fine; however, there should also be tables including the results for all constituents sampled at a location.
7. **General Comment:** LANL does not specifically address groundwater monitoring of the MDA's. EPA is under the impression that groundwater monitoring wells will be completed in the canyons that encompass TA-54. A discussion of this topic should be included in the RFI report. Also, there needs to be a discussion on whether the soil-gas plume currently in the tuff is a likely source for future groundwater contamination.