



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



February 18, 1999



*See  
2/18/99  
John K  
Please forward to EPA  
if you concur by 2/16/99  
or forward to EPA by  
New Mexico with your  
recommendation of your  
position  
2/11/99*

*713011/13*

Mr. Benito Garcia, 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-73 SWMUs, LA-UR-98-3824, EM/ER:98-455, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed LANL's RFI Report for TA-73 dated November 30, 1998, and has found the Report to be approvable. EPA comments and recommendations are enclosed for your review.

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

Sincerely,

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

Enclosure



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*TL*

### Comments and Recommendations on LANL's RFI Report for TA-73 SWMUs

This RFI Report includes the following SWMUs: 73-001(a), the main landfill located north of the airport runway; 73-001(d), the debris disposal area located north of the airport runway; 73-001(c), bunker debris pits; 73-001(b), the waste oil pit; and, 73-004(d), septic tank for landfill office.

Essentially, the SWMUs have been grouped together and investigated as two landfills. Originally, SWMU 73-004(d) was a separate unit; however, later landfilling operations encompassed the SWMU and it is now located within the boundaries of the main landfill (SWMU 73-001(a)). SWMUs 73-001(b) and 73-001(c) were also separate units at one time; but later became encompassed by the landfilling operations of SWMU 73-001(d), the debris disposal area landfill.

PRS	LANL'S PROPOSED ACTION	DOES AA CONCUR?	AA RATIONALE
73-001(a)	CMS	Yes	See recommendations
73-001(b)	CMS	Yes	See recommendation
73-001(c)	CMS	Yes	See recommendations
73-001(d)	CMS	Yes	See recommendations
73-004(d)	CMS	Yes	See recommendations

### Comments and Recommendations

LANL mentions in the Conclusions and Recommendation Section of the RFI Report that they will be developing a corrective action plan or a "Presumptive Remedy for CERCLA Municipal Landfill Sites" for the SWMUs contained in the RFI Report. In general, NMED agrees with LANL's recommendation; however, there is no schedule indicating when the above mentioned document will be submitted to NMED. **Note: NMED needs to specify the timeframe for submittal of this document.**

Also, LANL needs to ensure that the remedy document (submitted to NMED) addresses the following items:

1. Runon and runoff of all surface drainage associated with the Landfill SWMUs;
2. Capping of the Landfills, especially in the “depressed” or “settled areas”;
3. Types of monitoring systems to be employed during closure/post closure at each Landfill;
4. Stabilization procedures to be used at each Landfill; and,
5. Institutional controls to be used.

#### **Notes to NMED**

1. One surface sample taken from the main landfill near the northern edge of the mesa contained Arclor 1254 at 7.6 mg/kg (duplicate was 2 mg/kg) and lead at 463 mg/kg. The EPA risk based screening level for Arclor 1254 in a residential scenario is .97 mg/kg and 18 mg/kg in a industrial scenario. The EPA risk level for lead for residential use is 400 mg/kg. This information is brought to NMED’s attention because of the proximity to the canyon and NMED’s surface water concerns. NMED could require LANL to perform a “hot spot” removal.