



REGION 6

DALLAS, TX 75270

January 17, 2025

Mr. Robert Edwards III
Program Manager
Environment, Safety, Health and Quality
N3B-Los Alamos
1200 Trinity Drive, Suite 150
Los Alamos, New Mexico 87544

Dear Mr. Edwards:

Thank you for your recent submission of "Self-Implementing Cleanup and Disposal Plan for Solid Waste Management Unit 33-012(a) at Los Alamos National Laboratory". After conducting an initial review of the provided materials, we have determined that additional information is necessary to determine if the plan should be approved or denied.

To ensure compliance with federal regulations, including but not limited to those specified in 40 CFR 761.71(a) *Self-implementing on-site cleanup and disposal of PCB remediation waste*, and to facilitate the continuation of the PCB cleanup and disposal process, please provide the following information:

1. EPA sampling and analysis methods used and sample collection and analysis dates (761.61(a)(3)(i)(B))
 - a. Laboratory analytical reports
 - b. Quality control sampling data
2. Detailed cleanup schedule, waste disposal plan, and disposal technology (761.61(a)(3)(i)(D))
 - a. Contingencies for unanticipated higher concentrations or wider distributions of PCB remediation waste
 - b. Description of how PCB remediation waste will be managed on-site
3. 2019-2020 Phase I RCRA Facility Investigation
4. 2021 Phase II RCRA Facility Investigation
5. 2024 Phase III RCRA Facility Investigation
6. All reference documents from "Self-Implementing Cleanup and Disposal Plan for Solid Waste Management Unit 33-012(a) at Los Alamos National Laboratory" Section 11.0 "Document References"
7. Decontamination and sampling plan for sampling equipment, tools, and equipment used for cleanup and verification sampling (761.61(a)(5))
8. Most recent map of Areas of Environmental Interest for federally listed endangered species for

- Los Alamos National Laboratory, including the cleanup area
9. Description of dust suppression measures to be used during excavation
 10. N3B-SOP-ER-2001, "Soil, Tuff, and Sediment Sampling"
 11. N3B-SOP-ER-2002, "Field Decontamination of Equipment"

Please provide answers to the following questions:

1. Was Building 33-39 tested for PCBs?
2. What is QBT3? (Table 3.0-1 PCB Analytical Results for SWMU 33-012(a))
3. What measures will be taken to meet the requirements of 761.61(a)(8) for low occupancy area cleanups?

The notification required in 40 CFR 761.61(a)(3) is not complete therefore the 30-calendar day response from EPA outlined in 40 CFR 761.61(a)(3)(ii) is no longer applicable.

If you have any questions regarding this request or would like to request a meeting to discuss this further, please contact Dr. Amber Garcia-Arañoz at 214-665-2179 or garciaaranoz.amber@epa.gov, or Claire Rosales at 214-665-6571 or rosales.claire@epa.gov.

Sincerely,



Harry Shah
Acting Branch Manager
RCRA Corrective Action, UST, Solid Waste &
Permits Branch

cc: Brian Harcek, US DOE
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