



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

Handwritten: Barbara Driscoll
file FY94
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JAN 14 1994

JAN 12 1994

Mr. Joseph C. Vozella, Chief
Environment, Safety and Health Branch
Department of Energy
Los Alamos Area Office
Los Alamos, New Mexico 87544

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Re: Notice of Deficiency, Voluntary Corrective Action Plan for
SWMU 0-016 (inactive firing range)
Los Alamos National Laboratory, NM0890010515

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has reviewed the stabilization action entitled "Voluntary Corrective Action Plan SWMU 0-016, Inactive Firing Range" dated September 28, 1993 and found it to be deficient. Enclosed is a list of deficiencies for which you have forty-five (45) days from receipt of this letter to address.

Final approval of this or any other final remedy is subject to public participation requirements and approval of a Class III permit modification. Because this area may someday be developed for residential use, EPA requests that Los Alamos National Laboratory seek public input and comment on the proposed clean-up levels for lead and the proposed remedy as soon as possible.

Should you have any questions, please contact Barbara Driscoll at (214) 655-7441.

Sincerely,

William K. Honker, P.E.
Chief
RCRA Permits Branch (6H-P)

Enclosure

cc: Benito Garcia, NMED
Robert Vocke, LANL EM-13

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comment 5/2



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List of Deficiencies

1. LANL shall provide analytical methods for any laboratory analysis. LANL should ensure that lab analysis can be directly compared with field analysis using an XRF in order to demonstrate that field screening techniques are adequate for determining lead levels. If LANL demonstrates that results using XRF are comparable with laboratory analysis, then it is acceptable for the soil washing batch samples to be analyzed with an XRF and composite sampling to be used for final confirmation of cleanup.
2. **3.1 Background Sampling, p. 5** - At what depth will background samples be collected? What method will be used for sampling?
3. **3.2 Sampling during Soil Washing, p. 5** - How will analysis be conducted (field or laboratory) for the samples collected on a daily basis from the recirculating ponds?
4. A schedule of activities including timeframes for the confirmatory sampling results report shall be provided to EPA within the 45 day time-frame for the NOD Response.
5. LANL shall submit results of the confirmatory sampling in a phase report.