



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

AUG 19 1997

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She need to forward to DOE/LANL by 9/25/97

HSWA, LANL 1/1071/0

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

Re: NOD Comments on the Voluntary Corrective Action (VCA)
Completion Report for SWMUs 0-030(1), 0-030(m), and 0-
033(a), Los Alamos National Laboratory (LANL), EPA I.D.
NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed
LANL's VCA Completion Report for SWMUs 0-030(1), 0-030(m), and 0-
033(a), dated October 11, 1996, and has found the Report to be
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,
for Rich Mayer
David W. Neleigh, Chief
New Mexico and Federal
Facilities Section

Enclosure



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TL

**NOD Comments on the Voluntary Corrective Action Completion Report
for PRS 0-030(l), 0-030(m), and 0-033(a)**

SWMU 0-030(l)

General Comment: LANL needs to include the soil boring logs and field screening results for the soil samples taken at this SWMU.

Pages 14 and 15; Table 2.1.4-1: Please include the sampling depths in the revised Report.

Page 27; Field Activities: Why were there no confirmation samples taken from underneath the removed vitrified clay pipe?

Page 30; Inorganics: Please include the XRF inorganic results and the sampling depths for the samples taken. Also, XRF may be a good tool for determining the areal contamination from a SWMU, but it is not to be used solely for confirmation samples.

Page 32; Evaluation of Organics: Please provide all the organic results in Table 2.3.2-3 in the revised Report.

Page 34; Conclusions and Recommendations: EPA disagrees with the NFA recommendation for the following reasons:

1. Not all the sampling results and logging/field notes were included in the report;
2. No confirmation samples were taken underneath the removed pipe;
3. Confirmation samples taken underneath the septic tank for metals were not lab analyzed. XRF analysis were used which is unacceptable, especially without any lab samples taken in conjunction. Also, investigation samples underneath the exiting pipe used only XRF analysis, with no lab analysis. This is unacceptable. EPA cannot approve a NFA determination until all the information is submitted in the Report.

PRS 0-30(m)

General Comment: Please include the sampling depths in all sampling result tables and the "Summary of Samples Collected" table in the revised Report. Also, include the analytical results for all the constituents analyzed in each sample, not just those above UTLs, SALs, or EQls.

General Comment: LANL needs to include the soil boring logs and field screening results for the soil samples taken at this SWMU.

Page 55; Field Activities: Why were there no confirmation samples taken from underneath the removed vitrified clay pipe? Also, XRF results are not acceptable for verification samples.

Page 62; Conclusions and Recommendations: EPA disagrees with the NFA recommendation for the following reasons:

1. Not all the sampling results and logging/field notes were included in the report;
2. No confirmation samples were taken underneath the removed pipe;
3. Confirmation samples taken underneath the septic tank for metals were not lab analyzed. XRF analysis were used which is unacceptable, especially without any lab samples taken in conjunction. Also, investigation samples underneath the exiting pipe used only XRF analysis, with no lab analysis. This is unacceptable.

SWMU 0-030 (a)

Page 62; Field Activities: LANL should include the following in the revised Report: all analytical sampling results with sampling locations on a map; all soil boring logs and field notes; and the approval letter from the NMED UST program.

Appendix B; Page B-1: In section 4.2, LANL mentions that report is contained in Appendix B; however, there is nothing there. Please revise.

Appendix E; Page E-1: There is no closure form or closure worksheet in this section. Please revise.

Page 68; Conclusions: EPA cannot agree with LANL's conclusion since the data for the investigation is not included in the Report.