



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

Handwritten notes:
State -
7/21/97 -
Comments re return
to EPA for approval
Received 11/9/97
12/2/97

Handwritten: 1/1071/6

October 2, 1997

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

RE: Review of LANL VCA Completion Report for PRS 0-032,
EPA I.D. No. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a technical review of Los Alamos National Laboratory (LANL) RCRA Voluntary Corrective Action (VCA) Completion Report for cleanup activities in Technical Area (TA)0, Potential Release Site (PRS) 0-032, dated April 30, 1996. The EPA has found the Report to be deficient and enclosed is a list of deficiencies.

If you have any questions or need additional information, please contact Allen T. Chang of my staff at (214) 665-7541.

Sincerely yours,

Signature of David W. Neleigh
David W. Neleigh, Chief
New Mexico/Federal Facilities
Section

Enclosure



Handwritten mark: 2

LIST OF DEFICIENCIES (LOD)
LANL VCA COMPLETION REPORT FOR PRS 0-032

General Comments

1. The VCA completion report may function as the equivalent of the RCRA Facility Investigation (RFI) report. Besides, LANL should submit confirmation sampling and analytical results; without this information, the reviewer is unable to evaluate whether the VCA is complete and whether a No Further Action (NFA) is justified. **(Best Professional Judgement, (BPJ))**
2. This Report is poorly written. Much needed information is omitted from the Report. Also, there is no conclusion or summary section in the Report. No decision can be made, due to lack of information. **(BPJ)**

Site Specific Comments

3. Page 2; 1st paragraph: The results of the 1994 RFI investigation needs to be included in this Report. This should include all the information that would be contained in a RFI Report, not just partial information. **(BPJ)**
4. Page 2; 3rd paragraph: LANL must submit the field screening results of the soil from within, beneath and surrounding the drain line and sump boxes, and any soil boring data to demonstrate LANL VCA is complete. Please address any deviations from approved work plan. **(BPJ)**
5. Page 2; last paragraph: LANL needs to provide the waste characterization samples in the RFI Report. **(BPJ)**