



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

*See -
per forward
letter by 11/3/97
or record to
with record by
amc 11/3/97*

November 19, 1997

DEC 19 1997
RECEIVED

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 C-0-042,
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) C-0-042, 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,

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

Enclosure



6963

LIST OF DEFICIENCIES
LANL VCA COMPLETION REPORT FOR PRS C-0-042

1. Page 5, Section 3.1 Remedial Implementation: LANL did not mention about the excavation activities regarding any pipelines connected to the UST. Please clarify whether any pipes exist and, if they do exist, describe any detective activities to ensure that no contamination exists along the pipeline. **(Best Professional Judgement, (BPJ))**
2. Page 6, 1st paragraph: The last sentence of this paragraph indicated that screening and confirmatory samples were collected from the middle, northeast corner and southeast corner of the excavation where the primary soil contamination was encountered. However, the report repetitively stated that the primary area of contamination is to the west of the UST, where no sample was taken, please clarify. **(BPJ)**
3. Page 6, Section 3.2: Information on sampling procedures and sample preservations prior to and during shipment should be included. **(BPJ)**
4. Page 11, Section 4.2 Method of Management and Disposal: LANL detailed the solid waste management in this section but did not discuss the liquid waste in the tank. Please explain how LANL manages the liquid waste. **(BPJ)**
5. Page 11, Section 4.2: Tank cleaning procedures and criteria used to verify the tank is clean should be included. **(BPJ)**
6. Please clarify whether this PRS is included in the Hazardous and Solid Waste Amendments module to the LANL RCRA permit. **(BPJ)**