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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

May 26, 1998

Mr. Theodore Taylor, Project Manager
Los Alamos Area Office
Department of Energy
528 35th Street
Los Alamos, New Mexico 87544

Mr. John Browne, Director
Los Alamos National Laboratory
P. O. Box 1663, Mail Stop A100
Los Alamos, New Mexico 87545

RE: Rejection of VCA Completion Report
C-0-036(a-d) & 9-010(a-b)
Los Alamos National Laboratory
NM0890010515

Dear Mr. Taylor and Mr. Browne:

The RCRA Permits Management Program (RPMP) of the New Mexico Environment Department's Hazardous and Radioactive Materials has reviewed the VCA Completion Report (LAUR-96-435) for C-0-036(a-d) & 9-010(a-b) dated September 12, 1995. RPMP rejects this document based on the information detailed in the attachment.

The Department of Energy/Los Alamos National Laboratory (DOE/LANL) should respond to the rejection of this document by revising and resubmitting this document for review and approval. RPMP is open to discussing this rejection letter and its contents upon request. However, DOE/LANL should realize that this rejection letter is based on items previously discussed in DOE/LANL/RPMP cooperative forums.

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Mr. Taylor and Mr. Browne
May 26, 1998
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Should you have any questions regarding this letter, please contact me or Mr. John Kieling, RPMP's LANL Facility Manager, at (505) 827-1558.

Sincerely,



Robert S. ("Stu") Dinwiddie, Ph.D., Manager
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau

RSD:kth

attachment

cc w/ attachment:

T. Baca, LANL EM, MS J591
J. Canepa, LANL EM/ER, MS M992
J. Davis, NMED SWQB
B. Garcia, NMED HRMB
K. Hill, NMED HRMB
M. Johansen, DOE LAAO, MS A316
J. Kieling, NMED HRMB
S. Kruse, NMED HRMB
M. Leavitt, NMED GWQB
H. LeDoux, DOE LAAO, MS A316
D. McInroy, LANL EM/ER, MS M992
D. Neleigh, EPA 6PD-N
J. Parker, NMED DOE OB
J. Vozella, DOE LAAO, MS A316
S. Yanicak, NMED DOE OB, MS J993
File: HSWA LANL HSWA LANL 1/1071/0 + 5/1157/9
Track: LANL, doc date, NA, DOE/LANL, NMED HRMB/Dinwiddie, RE, file

ATTACHMENT
Rejection of VCA Completion Report
C-0-036(a-d) & 9-010(a-b)
September 12, 1995

The following potential release sites were presented in this document:

BASIS FOR REJECTION

1. LANL failed to provide the analytical results from samples obtained as part of this corrective action.
2. LANL failed to include detection limits and/or screening action levels as part of this document.
3. LANL failed to adequately characterize the site: C-0-036(a) [3 discreet debris piles, of which only 2 were sampled]; C-0-036(b) [only one sample obtained]; C-0-036(c) [inadequate confirmatory sampling]; and C-0-036(d) [1 of 2 piles sampled for gross α and β only].
4. LANL failed to adhere to the approved VCA Workplan: C-0-036(a-b) [eliminated analyses for PCBs and added SVOCs], C-0-036(c) [eliminated analyses for PCBs and added TAL metals], and C-0-036(d) [eliminated analyses for PCBs and TCLP].
5. LANL inappropriately used Region IX Preliminary Remediation Goals as site-specific cleanup concentrations: C-0-036(a-b).
6. LANL relied on inappropriate analytical methods (such as TCLP) for site characterization: C-0-036(a-b).
7. LANL failed to provide information regarding the corrective action activities for 9-010(a-b).