



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

*5/11/98 - please forward to  
H/DOE by 5/18/98 or forward  
to EPA by same date w/ rationale.  
Benito*

April 1, 1998

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

**RE: Review of the LANL VCA Completion Report for PRS 06-007(f),  
EPA I.D. No. NM0890010515**

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a technical review of the Los Alamos National Laboratory (LANL) RCRA Voluntary Corrective Action (VCA) Completion Report for cleanup activities in Technical Area (TA) 6, Potential Release Site (PRS) 06-007(f), dated February 26, 1996. The EPA has found parts of 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*  
David W. Neleigh, Chief  
New Mexico/Federal Facilities  
Section

Enclosure



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*HSWA LANL 5/11/98*

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**LIST OF DEFICIENCIES**  
**LANL VCA COMPLETION REPORT FOR PRS 6-007(f)**

1. Page 1; RFI History: If this report is supposed to take the place of a RFI Report, then LANL needs to submit a more thorough Report, and needs to report all soil boring descriptions, soil sampling depths, analytical results, a map showing all soil sampling locations and their relationship to the confirmatory soil samples, and all field screening results (RFI Phase I and VCA) in the VCA Report. Also a QA/QC section on data quality is needed. **(Best Professional Judgement, (BPJ))**
2. Page 2; 3rd paragraph: LANL needs to clarify how deep the soil was removed in the 20 by 30 foot area? Did LANL remove all visible contamination such as the ash, glass, and metal debris? **(BPJ)**
3. Page 5; TABLE 1: Two of the three final confirmation samples showed that lead is still several times higher than lead background UTL (39 mg/kg). After the VCA, lead concentration decreases drastically from the original 1290 mg/kg (AAA8827) to 196 mg/kg (VCXX-95-0127) and 91.1 mg/kg (VCXX-95-0129); however, contamination still remains. LANL shall explain:
  1. How far are those confirmatory sample locations away from the FRI sample ID AAA8827? Could LANL show the locations of both the RFI and the confirmatory samples in one figure.
  2. How many inches of soil had LANL removed from the surroundings of the Location ID AAA8827?
  3. How deep was the RFI sample taken at AAA8827?
  4. Had any confirmatory samples been taken from the same spot or nearby soil?

LANL should take deeper samples at those locations. Possibly a deeper sample may be needed at sample ID AAA8828. **(BPJ)**

Appendix A: RFI SAMPLE DATA FOR PRS 06-007(f)

4. Please clarify the meanings of the following terms: "Begin", "End", "I" in Units column, "FD" in Field Code column, "D" in Lab Code column, and "R" and "W" in EPA Qual column.  
**(BPJ)**