



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

AUG 06 1997



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 SWMU 12-001(a), Los Alamos National  
Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed  
LANL's VCA Report for SWMU 12-001(a), dated September 1996, and  
has found the Report to be deficient. Enclosed are a list of  
deficiencies for your review.

Should you have any questions, please feel free to contact  
Mr. Rich Mayer at (214) 665-7442.

Sincerely,

*David W. Neleigh*  
David W. Neleigh, Chief  
New Mexico and Federal  
Facilities Section

Enclosure



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**NOD Comments on the Voluntary Corrective Action Completion Report  
for PRS 12-001(a)**

**General Comment:** This SWMU appears to be a good candidate for a no further action determination; however, LANL has failed to provide the sampling results/information necessary to show that no contamination has occurred outside the SWMU. Referencing sampling results to another document is unacceptable in corrective action Reports. All pertinent sampling results for each SWMU must be included in each VCA/RFI Reports.

**Page 1; Section 2.0:** LANL must include all sampling data that has been performed at each SWMU in future Reports. The Report must be a "stand alone" document.

Also, LANL mentions that six surface samples were collected outside the steel-lined firing pit. However, only 3 samples were submitted for fixed laboratory analysis. What were the other 3 samples used for?

**Page 4; Section 3.1:** LANL must include in all future Reports a residential risk assessment calculation in addition to LANL's preferred risk assessment scenario.

**Page 4; Section 3.3:** LANL mentions that no confirmatory sampling was performed because all the waste was removed from the steel lined pit. Did LANL inspect the steel liner to ensure that it was not cracked or had tears in it? This was not mentioned in the RFI Report.

**Page 7; Appendix A, 1st paragraph:** LANL mentions that the sample data were compared to the QA/QC sample data using numerical acceptance criteria established by either the analytical laboratory or EPA. Please clarify the criteria you are using in determining the data usability. Was this criteria approved by the Administrative Authority?

Also, LANL mentions that some of their data is qualified, what does the PM qualifier mean?

**Page 7; Third Paragraph:** LANL mentions that the sample values for certain analytes were less than 10X the blank value, indicating that the detection could be the result of blank contamination. By what criterion is LANL using to make this assumption?