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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

June 15, 1998

Mr. Theodore Taylor, Program Manager
Los Alamos Area Office
Department of Energy
528 35th Street, MS A316
Los Alamos, New Mexico 87544

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

**RE: Notice of Deficiency
VCA Completion Report on PRS 12-001(a)
Los Alamos National Laboratory
NM 0890010515**

Dear Mr. Taylor and Dr. Browne:

The RCRA Permits Management Program (RPMP) of the Hazardous and Radioactive Materials Bureau has reviewed the VCA Report for Potential Release Site (PRS) 12-001(a), dated September 1996, referenced by LA-UR-96-3316 and Response to the Request for Supplemental Information dated December 5, 1997, referenced by EM/ER: 97-513 and found them to be deficient. Los Alamos National Laboratory (LANL) must respond to the deficiencies noted in Attachment A within thirty (30) calendar days of the receipt of this letter.



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Should you have any questions regarding this matter, please contact me or Mr. John Kieling, RPMP's LANL Facility Manager, at (505) 827-1558.

Sincerely,



Benito J. Garcia
Bureau Chief
Hazardous & Radioactive Materials Bureau

RSD:ND

cc w/attachments:

J. Canepa, LANL EM/ER, MS M992
J. Davis, NMED SWQB
B. Garcia 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
S. Yanicak, NMED DOE OB, MS J993
File: Reading and HSWA LANL 2/1085/12/12-001(a)
Track: LANL, June 15, 1998, NA, DOE/LANL, RPMP/Garcia, RE, File

Attachment A
List of Deficiencies
VCA Completion Report for Potential Release Site
Response to Request for Supplemental Information
12-001(a)

1. LANL did not characterize the distribution of contaminants left in place (e.g. uranium, arsenic, chromium and thallium) in the area surrounding the pit (i.e. area between the pit and 150 feet radius). The samples taken at the radius of 50 feet (e.g. # 0005, 0006, 0008 shown on the site map) were not submitted for fixed laboratory analyses even though contamination was detected in the samples taken at the radius of 150 feet. The contaminant concentrations in the area between the pit and 150 feet radius may be higher than those found at the 150 feet radius. Consequently, health risks associated with the contaminants left in place could be higher than those estimated. LANL shall perform additional sampling in the area surrounding the pit (e.g. at the radius of 50 and 100 feet from the pit) and submit the samples for fixed laboratory analyses.

2. LANL shall evaluate the potential impact of the contaminants (if detected at concentrations above background levels) on human health and ecological receptors. The evaluation should be conducted in accordance with NMED/HRMB guidance provided in the Risk Based Decision Tree. Chromium should be included in the evaluation of both carcinogenic and non-carcinogenic effects. All chromium detected should be assumed to be chromium VI, unless speciation data is available.