



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

*SFC*



AUG 13 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 14-001(f), Los Alamos National  
Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed LANL's VCA Completion Report for SWMU 14-001(f), dated September 27, 1996, and has found the Report to be deficient. Enclosed are the deficiencies for your review.

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

Sincerely,

*Rich Mayer*

*for*

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

Enclosure



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*FL*

**NOD Comments on the Voluntary Corrective Action Completion Report  
for PRS 14-001(f)**

**General Comment:** The Inactive Bullet Test facility may be a good candidate for a no further action determination; however, LANL has failed to provide the site characterization data necessary to merit a no further action determination. LANL needs to recognize that the VCA plans were submitted and implemented without regulatory review or approval. 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 Report.

**Page 4; Section 2.0:** LANL must include **all** sampling data that has been collected at each SWMU/PRS. This should include all the sampling results from the RFI investigation.

**Page 4; Section 3.1:** NMED requires all sites to have residential risk assessment calculations/numbers.

**Page 5; Confirmatory Sampling:** Did LANL check to see if the sump was cracked? Also, has or did the sump hold liquid wastes or precipitation? Accordingly, the Administrative Authority may require sampling underneath the sump or outside of the sump around the periphery.

**Note to NMED**

Just to make you aware, this PRS is not listed in the HSWA permit as a SWMU needing investigation.