



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

JAN 09 1998

*Steve -
Please forward
to LANL/DOE
by 2/13/98 or respond
to EPA with rationale
by the same date
1/12/98*

JAN 1998

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

Re: Review of the Supplemental Information for the Voluntary
Corrective Action (VCA) Completion Report for PRS 14-001(f),
Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed
LANL's Supplemental Information for the VCA Completion Report for
PRS 14-001(f), dated December 9, 1997, and has found the Report
to be complete and approvable. For your convenience, EPA has
enclosed some issues for NMED to consider regarding this PRS.

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

Sincerely,

Michael D. Overbay for

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

Enclosure



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Issues Pertaining to PRS 14-001(f)

Background: This PRS consists of a steel cylindrical structure 13.3 ft. by 13.6 ft. by 8 ft. tall, and the underlying sump composed of reinforced concrete with dimensions of 13 ft. by 13 ft. by 4.5 feet deep. Various firing tests were conducted in the steel tube, with the test material usually being contained in the tube or the underlying sump. No liquid wastes (only solid materials) were placed in this PRS, except for some occasional precipitation. Time of use was from the late 1970's until the mid 1990's. The VCA performed removed the materials from the cylinder and the sump. The cylinder and the underlying sump had no cracks or other deformities. No soil samples were taken underneath the sump. Only waste samples from within the cylinder and sump were taken. This PRS is not included in the HSWA permit.

Issues: For this particular PRS, EPA is accepting a no further action determination because: 1) Waste materials within the tube and sump have been completely removed; 2) the cylinder and sump showed structural integrity, with no cracks or deformities, and 3) the waste material was solid and dry. **However, as a warning, this does not mean that EPA will accept a NFA determination for all sumps that have not had soil sampling conducted underneath the structure.** It will be on a case by case basis, according to the circumstances.

Also, EPA believes that this PRS is a SWMU and should be included in the HSWA permit. However, whether NMED requires LANL to incorporate this PRS into the HSWA permit is subject to NMED's permitting interpretations, policies, procedures or other considerations.