



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

*Stu -
Please forward
this to LANL/DIE
by 1/2/98 or
return to EPA w/
reasons for the
same date Benito*

HSWA LANL 3/1/82/16

NOV 14 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) Report
for PRS 16-011, Los Alamos National Laboratory (LANL), EPA
I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed
LANL's VCA Report for PRS 16-011, dated January 19, 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,

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

Enclosure



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TL

**NOD Comments on the Voluntary Corrective Action Report for PRS
16-011**

General Comment: EPA considers this PRS to be a SWMU since the waste contained in this SWMU contains hazardous waste/hazardous constituents.

In addition, EPA cannot agree on the NFA recommendation until all information requested is provided in the revised Report.

General Comment: LANL needs to include a section in the revised Report on the results of the quality assurance/quality control activities.

Page 1; 2nd paragraph: Did this pit contain water at times or was it shielded from precipitation?

Page 1; Corrective Action: LANL mentions that they took only 2 composited samples of the soil and ash from the pit, instead of 6 planned originally, due to the fact that only HE contamination existed. However, when they took the two samples they analyzed the samples for VOCs, SVOCs and metals. Please explain the logic in the sampling methodology. In addition, VOC samples should not be composited, therefore the VOC results would not be valid.

Page 3; Table 1; Although the table provided is not clear, EPA assumes that a portion of the analytical results presented in this table were obtained using the TCLP method. Please clarify.

Page 4; last paragraph: Did LANL sample for organics in the composited sample taken from the three rolloff containers?

Page 5; 1st paragraph: Did LANL manifest the total 180 cubic yards as hazardous waste; or did they manifest only part of that amount as hazardous?

Attachment A: The semivolatile detection limits are high for several analysis. Please provide an explanation in the revised Report.