



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

*Staff will need to forward a report to EPA by 9/10/97*



SEP 05 1997

*Handwritten: H-10, LANL 1/10/96/21-024(b, d)*

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 21-024(d), 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 21-024(d), dated January 23, 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

*TV*



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**NOD Comments on the Voluntary Corrective Action Completion Report  
for PRS 21-024(d)**

**General Comment:** If hazardous constituents were found downslope of the outfall, then LANL would need to sample underneath the tank and any associated piping. This Report does not mention whether hazardous constituents were found. It implies that only radionuclides were found in the soil sampling. This needs to be clarified in the Report.

**Page 1; 2nd paragraph:** Did LANL formally submit a Class III permit mod to EPA or NMED that included this SWMU for NFA? Also, EPA's acceptance of the NFA proposal back in March of 1995 is a tentative decision and is not final until all public participation procedures are completed and a final determination is issued. Furthermore, the draft tentative decision could be reversed in the final decision.

**Page 2; Septic Tank Contents:** Please provide the results on all constituents analyzed (include the detection limits) in both the solid and liquid samples. LANL provided only partial results or results that were above detection limits.