



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

*See  
New Mexico  
by 10/17/97  
[Signature]*

September 8, 1997

1/1106/21

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(j), 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(j), dated January  
22, 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

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

**Page 1; 2nd paragraph:** Was the sump constructed of concrete or native materials? Please clarify in the Report.

**Page 1; Corrective Action:** If the sump was made of concrete, was there any cracks or other deformities in the bottom. If the sump was made of native materials, then taking samples to only 18 inches below the bottom of the sump is not deep enough.

**Page 2; 4th paragraph:** LANL mentions that samples were not screened for VOCs as was originally planned because they felt they were not present at the site. This statement is inconsistent with the previous paragraph, in which LANL mentions that they will sample for organics in a fixed lab. In the future, do not deviate from the approved RFI Work Plan without approval from the Administrative Authority. Otherwise, LANL takes the risk of performing the work over.

**Page 2; Results:** Please include the soil boring log in the revised Report.

**Page 2; Background Comparison:** Please include the organic results in the revised Report. Also, were are the results for cadmium and selenium?

**Page 3; Conclusions:** EPA cannot agree on a NFA determination until all information and results are submitted.