



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

*Stu.  
Rec.  
need to forward  
by 10/12/97  
Smith*

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(e), 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(e), 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

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*TU*



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

**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; 1st paragraph:** LANL mentions that the only contaminant present at levels greater than the screening action levels was plutonium-239. Please clarify whether there were any contaminants above UTLs or above detection limits for organics.

**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.