



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

*Stu -
Please review
forward to facility
by 11/28/97 or
return to EPA
with appropriate
Bando
10/28/97*

OCT 23 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(h), 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(h), dated February
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

TL



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

Page 1; 1st paragraph: LANL needs to include the sampling results for the hazardous constituents in the VCA Report. If LANL is trying to obtain a NFA determination, all information should be included in this Report, not referenced. The VCA Report should be a "stand alone" document.

Page 1; Corrective Action: In the second paragraph, LANL mentions that they did not follow their workplan by not taking a sample. Please note that if LANL does this from an approved workplan from EPA, LANL will be required to take the sample missed.

Page 2; 3rd and 4th paragraphs: EPA cannot agree with LANL's closure actions of the septic tank until reviewing the outfall sampling results. If the outfall area sampling results show organics, then EPA will require confirmatory sampling underneath the septic tank. Also, if LANL conducted a "flawed" sampling of the outfall area, EPA may require additional sampling.

Page 3; Drainage Area Samples: LANL needs to include the sampling results for the hazardous constituents in the VCA Report. The VCA Report should be a "stand alone" document.

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

Page 6; Table 2: Please include all the metal results, LANL only included the Barium results. Is the second table TCLP results?