



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

January 5, 1998

*See -
Please forward
to LANL/DOE
by 2/13/98 remaining
to EPA by name
with operations
Benito
11/2/98*

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Mr. Benito Garcia, Chief
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
2044A Galisteo St.
Santa Fe, New Mexico 87505

RE: Review of LANL VCA Completion Report for PRS 33-016,
EPA I.D. No. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has completed a technical review of Los Alamos National Laboratory (LANL) RCRA Voluntary Corrective Action (VCA) Completion Report for cleanup activities in Technical Area (TA)-33, Potential Release Site (PRS) 33-016, dated January 19, 1996.

Based upon the information presented in the report, the EPA has found parts of the Report to be deficient and enclosed is a list of deficiencies. The EPA recommends that NMED HRMB delay the decision of LANL No Further Action (NFA) request until reviewing the requested information.

If you have any questions or need additional information, please contact Allen T. Chang of my staff at (214) 665-7541.

Sincerely yours,

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



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**LIST OF DEFICIENCIES
VCA COMPLETION REPORT FOR PRS 33-016**

Site Specific Comments:

1. Page 1, 2nd paragraph: It states that the soil at the outfall was sampled but revealed no contamination. LANL shall include the analytical results in the VCA report. **(Best Professional Judgement (BPJ))**
2. Page 1, 2nd paragraph: The results of the RFI sampling indicated that the sludge contains several organics which were above health-based levels.

If LANL wants to abandon the concrete sump in-place, then they should demonstrate that no sludge has leaked outside the sump by examining the sump and collecting samples from the sides and underneath the sump. The confirmatory samples did not achieve this purpose. Therefore, VCA is not complete. **(BPJ)**