



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

*Stu -
These need
to be forwarded
by 9/12/97*

AUG 06 1997

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 36-003(b)- Septic System, Los
Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed
LANL's VCA Report for SWMU 36-003(b), dated September 30, 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. Neeligh
David W. Neeligh, Chief
New Mexico and Federal
Facilities Section

Enclosure

SWMU 36-003(b) 2/13/97



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NOD Comments on the Voluntary Corrective Action Completion Report for PRS 36-003(b)

General Comment: This SWMU may be a good candidate for a no further action determination; however, LANL has failed to provide the site characterization and waste sampling data necessary to merit a no further action determination. LANL needs to recognize that the VCA plans were submitted and implemented without regulatory review or approval. Referencing sampling results to another document is unacceptable in corrective action Reports. All pertinent sampling results for each SWMU must be included in each VCA/RFI Report.

Page 1; Section 2.0: LANL must include **all** sampling data that has been performed at each SWMU in future Reports. This should include the sample results from the outfall area, the liquid and the sludge. The Report must be a "stand alone" document.

Page 3; Section 3.3: Did LANL visually check the tank for cracks or other imperfections?

Page 4; Section 4.2: LANL found RDX in the effluent at 128 ug/l. What is the detection limit for this sample. Also, was RDX found in the sludge?

In addition, where are the metals and TCLP results for the sludge? This needs to be included in the Report!

Page A-1; Appendix A: LANL needs to include in this Report the QA/QC information on the TCLP analysis and the data collected during the RFI investigation.