



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

*Stu -  
Please forward these  
deficiencies by 12/01/97  
or return to EPA  
if not - cc me  
Thanks - [unclear]  
10/21/97*

OCT 28 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 PRS 39-002(c), 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 PRS 39-002(c), dated January  
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,

*[Signature]*  
David W. Neleigh, Chief  
New Mexico and Federal  
Facilities Section

Enclosure



2423

TL

**NOD Comments on the Voluntary Corrective Action Completion Report for PRS 39-002(c)**

**General Comment:** LANL needs to include a section (in the revised VCA Report) on the results of quality assurance/quality control activities.

**Page 1; 3rd paragraph:** LANL needs to include the sampling results from the 1993 RFI 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:** LANL mentions that the approved VCA plan was followed with some deviations. Who approved the plan, DOE, EPA, or NMED?

**Page 2; 1st paragraph:** How deep was the soil screened at each site for VOC's.

**Page 2; 2nd paragraph:** LANL mentions that at subsite A soil was excavated. How deep was the soil excavated? Also, was this PRS sampled for VOC's in the 1993 RFI investigation? Since this site included waste containing VOC's, VOC's should have been analyzed from the soil samples taken in 1993.

The same logic can be used for sampling VOC's at site B also.

**Page 2; 5th paragraph:** LANL mentions that at subsite D soil was excavated. How deep was the soil excavated?

**Page 2; 7th paragraph:** Confirmatory soil samples for subsites A and B should include VOC analysis, since VOC's were in the waste stored at PRS 39-002(c).

**Page 3; Request for Concurrence:** EPA cannot agree on a NFA determination until all information and results are submitted in a revised VCA Report.