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0017  
GENERAL August 24, 1994

Theodore J. Taylor, Program Manager  
Environmental Restoration  
Los Alamos Area Office, A316  
Los Alamos, New Mexico 87544

Jorg Jansen, Program Manager  
Environmental Restoration  
Los Alamos National Laboratory, M992  
Los Alamos, New Mexico 87545

RE: **Approach to site assessment of LANL firing sites**

Dear Sirs:

Agreement in Principle (AIP) staff reviewing Los Alamos National Laboratory (LANL) RCRA Facility Investigation workplans have reported that the approaches used for evaluation of firing sites at LANL may not be designed in such a way as to provide the information which will be necessary for remediation of the sites. The objective of this letter is to outline some of my AIP staff comments as the basis for a meeting on this subject between DOE/LANL and NMED.

Staff Comments

1. Some of the plans employ transects of sampling points across the sites. Some employ a grid approach where samples are taken at grid intersections. In all cases samples are planned to be collected using coring instruments and will represent the contamination at discrete, generally six-inch diameter point locations across sites which occupy from tens to hundreds of acres unless the observed contamination at discrete sites is assumed to be uniformly distributed at the same concentrations throughout the site. AIP staff are uncertain as to what can be concluded from such samples other than that at the exact locations in question a piece of air-fall shot debris either existed at such points or it did not.
2. The workplans are largely silent regarding the specific objectives the data is designed to achieve. The general objectives which are included in the firing site sampling plans are those found in all sampling plans for all types of units at LANL: 1) to determine whether there has been a release of contaminants into the environment, and 2) to determine whether the release exceeds action levels. Since at these sites in many cases tons of contaminants were explosively dispersed over decades, there is no question that a release has occurred. It is also very likely that the release exceeds action levels.
3. The objectives which should be addressed by the firing site sampling plans should include the following:
  - a) What is the distribution of contaminants around the shot pad? Where are the areas of large pieces of debris and where are the areas where fine particulates are the most significant contaminants?
  - b) Is there a region of fine particulate contamination in the predominantly down-wind 'shadow' of the firing pad?

XXI



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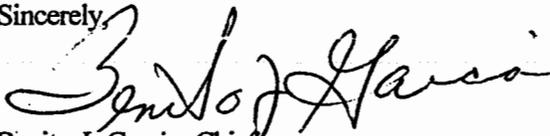
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- c) What is the volumetric contaminate load at various distances from the shot pad and what is the proportion of the total load represented by the various contaminants?

My AIP and RCRA program staff would like to meet with representatives of the ER program within thirty days of the receipt of the letter to discuss these issues.

If you have any questions regarding this matter, please contact me at (505) 827-4358 or Bruce Swanton at (505) 672-0447.

Sincerely,



Benito J. Garcia, Chief  
Hazardous and Radioactive Materials Bureau

BG/bas

cc: John Parker, NMED Program Manager  
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