

MAY 16 1995

Mr. Joseph C. Vozella
Assistant Area Manager
Environment, Health and Safety Branch
Department of Energy
Los Alamos Area Office
Los Alamos, NM 87545

Dear Mr. Vozella:

During a conversation on March 9, 1995, between Barbara Driscoll of my staff and members of Los Alamos National Laboratory (LANL), LANL requested from the Environmental Protection Agency (EPA) guidance on the whether to filter ground water samples when performing site investigations under the solid and hazardous waste program.

It has been the consistent policy of EPA, including the solid and hazardous waste programs under the Resource Conservation and Recovery Act of 1976 (RCRA), Hazardous and Solid Waste Amendments of 1984, and the Comprehensive Environmental Response, Compensation and Liability Act of 1980, that ground water samples will be analyzed without filtration except in very limited circumstances. This policy has been cited in numerous EPA guidance documents, including the RCRA Ground Water Monitoring Technical Enforcement Guidance Document (TEGD), September 1986; Handbook of Suggested Practices for the Design and Installation of Ground Water Monitoring Wells, March 1991; RCRA Ground Water Monitoring: Draft Technical Guidance, November 1992; and Risk Assessment Guidance for Superfund, December 1989. EPA also addressed this issue in promulgating the solid waste disposal facility regulations in October 1991. Specific requirements, contained at 40 CFR §258.53(b), state that "Ground water samples shall not be field filtered prior to laboratory analysis".

EPA believes analysis of unfiltered samples is necessary because: 1) filtration removes colloidal particles which are mobile in the ground water and capable of transporting contaminants; 2) analyses have generally shown a large portion of the metals load is associated with the mobile colloidal fraction; 3) collection of low turbidity ground



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2

water samples can be accomplished in most aquifers by properly constructed monitoring wells and use of proper sample collection techniques; 4) collection of background samples should counterbalance any elevated metals analyses caused by sampling technique; and 5) most domestic water wells would not have a filtration system capable of removing the colloidal fraction.

Should you have any additional questions concerning this EPA policy, please contact Ms. Barbara Driscoll at (214) 665-7441.

Sincerely,

William K. Honker, P.E., Chief
RCRA Permits Branch

cc: Mr. Benito Garcia
New Mexico Environment Department
Mr. Jorg Jansen
Los Alamos National Laboratory, MS M992