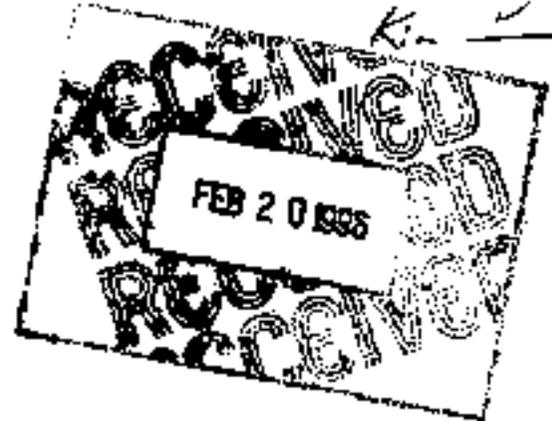




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 6
 1445 ROSS AVENUE, SUITE 1200
 DALLAS, TX 75202-2739

Ronald D
Barbara
John
Teri D
Sam
Kim

FEB 15 1996



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

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed a Los Alamos National Laboratory (LANL) memorandum dated September 19, 1995, on the topic of Mobile Analytical Van Assessment. This memorandum details numerous problems with the manner in which mobil analytical vans are being used at LANL. Of particular concern are the following items:

1. Analytical procedures for the mobile vans were not used, not kept or not kept according to, on going application; instrument and work logs were incomplete; procedures for correcting sample reporting errors were not in place or followed; instrument calibrations were not routinely done or documented.

2. Work quality and defensibility is uncertain. Chain-of-custody procedures were broken in all cases reviewed; no mobile van Quality Assurance Officer was identified for any van; XRF field blanks were not routinely included in sample queues; no evidence of an established or implemented quality assurance oversight program is available; data quality control before reporting is not formal; no QC charts are kept for trending of data and no quality performance samples are used to ensure the performance of the analysts.

This review of protocol and operations in the mobile vans points out significant problems with how these mobile laboratories are being used at LANL. The lack of proper procedures mean that work already done in mobile labs is of a questionable quality, and especially any XRF data.



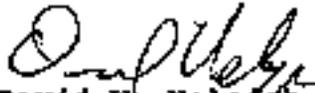
12761

R

In a letter dated December 5, 1995, EPA requested that LANL revise their Quality Assurance Program Plan (QAPP) by March 4, 1996, to address numerous concerns. LANL needs to also provide documentation which addresses the problems with the mobile vans or cease to use them until the above deficiencies are addressed. In addition, LANL should be sending at least 20% of all samples collected to off-site laboratories as a check on any quality assurance problems associated with samples analyzed on-site. LANL should also submit a list of all sites where mobile laboratories were used for sample analysis, specifically noting sites where XRF data was analyzed in mobile labs.

Should you have any questions, please feel free to contact Ms. Barbara Driscoll at (214) 665-7441.

Sincerely,



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