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July 10, 1996

Mr. G. Thomas Todd
DOE/LAAO
528 35th Street
Los Alamos, New Mexico

Dear Mr. Todd:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) 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 in the methods that Mobil analytical vans are being used at LANL. Concerns that must be addressed prior to NMED accepting the use of these mobile analytical labs are:

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.

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



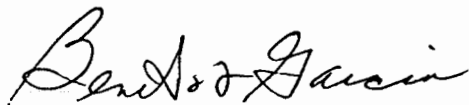
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cease to use them until the above deficiencies are addressed. In addition, LANL should be sending at least 20% of all samples collected to off-site laboratories as a check on any quality assurance problems associated with samples analyzed on-site. 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.

Sincerely,



Benito J. Garcia
Bureau Chief, HRMB

cc: Ted Taylor, DOE/LAAO
Barbara Hoditschek, NMED/HRMB
✓ Robert S. (Stu) Dinwiddie, NMED/HRMB
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