United States Government

Department of Energy

memorandum

Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

DATE: SEP 6 1995

REPLY TO ATTN OF: LAAMEP:2ET-003

SUBJECT: EPA approval of TA-15, R-44/45 Sampling and Analysis Plan

TO: Jorg Jansen, Program Manager, EM/ER, LANL, MS-M992

Attached is the EPA's approval of the RFI Sampling and Analysis Plan for SWMUs 15-006(c), 15-006(d), and 15-008(g) located at R-44/45 Firing Sites within Operable Unit 1086. The approval is contingent upon the attached list of modifications in which LANL (Field Unit 2) shall respond by September 15, 1995.

Should you have any questions, please contact Everett Trollinger of my staff at 667-5801.

Theodore J. Taylor
Program Manager
Environmental Restoration
Program

Attachment

cc:
See page 2

3917

cc w/attachment:
B. Garcia, Bureau Chief
Hazardous and Radioactive Materials
Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, New Mexico 87505
N. Weber, Bureau Chief
Agreement In Principle
DOE Oversight
N.M. Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
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E. Merrill, EM-453, HQ
T. Taylor, AAMEP, LAAO
E. Trollinger, AAMEP, LAAO
S. Yanicek, AIP, NMED, LANL,
MS-J993
J. White, ESH-19, LANL,
MS-K490
RPF, LANL, MS-M707
D. Griswold, ERD, AL

cc w/o attachment:
W. Spurgeon, EM-453, HQ
J. Vozella, AAMEP, LAAO
T. Baca, EM-DO, LANL, MS-J591
G. Rael, ERD, AL

File - 4.2.6.1.9.1.2

Copy for Everett, Count.

Everett - Pls prepare memo to Jorg. Ask for a revised sampling plan w/in 15 days.

Ted

then file.

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

AUG 23 1995

Mr. Joseph Vozella
Acting Assistant Area Manager
Environment and Projects
Department of Energy
Los Alamos Area Office
Los Alamos, NM 87544

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has reviewed and approves the sampling plan submitted for solid waste management units (SWMUs) 15-006(c), 15-006(d), and 15-008(g) in Operable Unit 1086 contingent upon the enclosed list of modifications. Los Alamos National Laboratory may initiate fieldwork on September 5, 1995, as indicated in the schedule and a report will be submitted to EPA on May 22, 1996.

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

Sincerely yours,

Allyn M. Davis

Allyn M. Davis
Director
Multimedia Planning and
Permitting Division

Enclosure

cc: Dr. Ed Kelley
New Mexico Environment Department
Mr. Benito Garcia
New Mexico Environment Department
Mr. Jorg Jansen
Los Alamos National Laboratory

List of Modifications
Los Alamos National Laboratory
Technical Area 15

1. 4.0 Data Needs and Data Quality Objectives, p. 6 -

a. Los Alamos National Laboratory needs to revise the data quality objectives (DQOs) for these sites. In order for Los Alamos National Laboratory to calculate the upper confidence limit (UCL) or the mean for risk assessment, at least 10 data points must be assessed. This means 10 sampling points which have acceptable laboratory analysis, and this would normally not include field screening sampling results. In order to meet this DQO, LANL will need to submit 50% of all surface soil samples (0-6 inches) for laboratory analysis.

b. LANL shall provide information on the laser-induced breakdown spectrometry (LIBS) field method being used, including the detection limits of the instrument and potential limitations. Results from the LIBS may not be used solely for field screening, but should be used in conjunction with x-ray fluorescence until this technology is proven.

c. The high explosive (HE) spot test kit employed by LANL is not sensitive enough to be used to determine the presence of HE below 100 ppm; therefore, LANL shall submit a minimum of four surface samples (0-6 inches) for laboratory analysis from within the first 25 foot grid. At solid waste management unit (SWMU) 15-006(c) this means four samples from the central grid, and four samples from the Optical Diagnostic grid for a total of eight samples submitted for HE analysis (SW 846 method 8330). Additional samples may need to be submitted based on results of the HE spot test kit.

2. LANL shall submit a minimum of 50% of the surface drainage samples collected at all SWMUs in this work plan for laboratory analyses. Because the SWMUs in Firing Site R-44 overlap, surface drainage sample results should be used to determine the migration of contamination from the entire area, and can not be attributed to any single source.

3. **5.5 Sampling at Firing Site R-45, PRS 15-006(d) and PRS 15-008(g), p. 8 -**

a. LANL shall submit a revised Figure 5-3 which indicates the location of PRS 15-008(g).

b. The number of samples being collected at PRS 15-008(g) indicated in text and Table 5-1 do not agree. LANL shall revise the table.