



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

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APR 26 1996

Mr. Benito Garcia, Chief
Hazardous and Radioactive
Materials Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, NM 87502

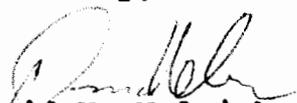
Re: Phase II Sampling and Analysis Plans for SWMUs 21-024(i),
21-024(c) and 21-027(a), Los Alamos National Laboratory

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed Los Alamos National Laboratory sampling and analysis plans dated January 29, 1996, for the following solid waste management units: 21-024(i), 21-024(c) and 21-027(a). The plans were found to be deficient, and enclosed is a list of deficiencies. EPA recommends allowing LANL sixty days to respond to these deficiencies.

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

Enclosure



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List of Deficiencies

Sampling Plan for TA-21 Los Alamos National Laboratory

Sampling plans for the following solid waste management units were reviewed: 21-024(i), 21-024(c), 21-027(a).

General Comments:

1. LANL continues to refer to other workplans, reports, and voluntary corrective action plans for information pertinent to the document being reviewed. If information presented in a previous document is pertinent to the approach being taken in the document being reviewed then LANL needs to repeat and provide the necessary information rather than citing another document. All reports and sampling plans should be complete documents, and the reviewer should not be required to find numerous other documents to complete a review and make a decision on the information being presented. Note: The Voluntary Corrective Action Plan listed (LANL 1995, 01-018) has not been reviewed, and the approach from this document (PRS 21-024(c)) cited on page 5, last paragraph has not been approved.
2. LANL needs to provide the detection limits for the field screening devices being used, in particular for the XRF.
3. Data is being collected for the possible recreational risk assessment and not for an eco-risk assessment which may need to be addressed at a later date.
4. When collecting the exterior samples, LANL should ensure that a sample is collected beneath where the piping enters and exits the septic tank.
5. LANL shall provide a schedule for field activities and RFI Report submittals.

Specific Comments:

PRS 21-024(c)

1. Figure 2, p. 3: The correlation between the 20 foot grid and the proposed phase II sampling locations is unclear. Is this related to the approach described in LANL 1995, 01-018, but not described in this document?
2. 3.4.1 Outfall Area, p. 7: Additional samples should be collected at depth at the outfall location 21-1391, as contamination has already been determined at the surface.

3. Because contamination was found at the outfall, LANL must also investigate the piping to and from the septic tank for leakage.

PRS 21-027(a)

4. 3.3 Field Screening, p. 8: LANL shall describe the field screening techniques being used for the chromium screening.
5. Depending on the results of Phase II sampling, then the piping may also need to be investigated for leakage.

PRS 21-024(i)

6. Depending on the results of the Phase II sampling, then the piping may also need to be investigated for leakage.