



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

February 22, 1999



*John K. ...
Sent to LANL ...
you concern by 2/26/99 ...
do not concern ...
2/1/99*

fisher LWW 1/11/06/21

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

Re: Comments on the Sampling and Analysis Plan (SAP) for SWMUs 21-003, 21-024(c), and 21-013(f), LA-UR-98-4171, EM/ER:98-404, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed LANL's SAP for SWMUs 21-003, 21-024(c), and 21-013(f) dated September 30, 1998, and has found the Plan to be approvable, provided that EPA comments and recommendations are included in the SAP. Enclosed are EPA's comments and recommendations.

Should you have any questions, please feel free to contact Mr. Rich Mayer at (214) 665-7442.

Sincerely,

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

Enclosure



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Comments and Recommendations on LANL's Sampling and Analysis Plan for SWMUs 21-003, 21-024(c), & 21-013(f)

This SAP includes the following SWMUs: 21-003, a PCB container storage area; 21-024(c), a septic system and its associated outfall; and, 21-013(f) a possible soil disposal area.

Comments/Recommendations

1. For SWMU 21-024(c), NMED will require that LANL take a deeper soil sample at location 21-391 from 2-3 feet to determine the vertical extent of contamination. All remaining soil sampling locations must go to at least 2 feet, except for sample location 21-392. **Note to NMED:** LANL's sampling plan had samples going only to 12 inches or to the tuff. If the tuff is shallower than 12 inches, then the sample interval would be less than 12 inches.
2. For SWMU 21-003, NMED will require that LANL take fixed-site lab analysis samples from 40 percent of the intervals where detectable PCB concentrations are observed from PCB test kit data. **Note to NMED:** LANL's sampling plan had a 20 percent requirement.