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RECEIVED
2005

Date: May 12, 2005
Refer To: ER2005-0283

Mr. James Bearzi
NMED – Hazardous Waste Bureau
2905 Rodeo Park Drive East
Building 1
Santa Fe, NM 87505-6303

SUBJECT: RESPONSE TO THE NOTICE OF "APPROVAL WITH MODIFICATIONS FOR THE INVESTIGATION WORK PLAN FOR DELTA PRIME SITE AGGREGATE AREA, AT TECHNICAL AREA 21"

Dear Mr. Bearzi:

Enclosed please find two copies of the Los Alamos National Laboratory's and the Department of Energy's response to the New Mexico Environment Department's notice of "Approval with Modifications for the Investigation Work Plan for Delta Prime Site Aggregate Area, at Technical Area 21." This notice of approval was received by the Environmental Stewardship–Environmental Remediation and Surveillance (ENV-ERS) Program on April 15, 2005.

Per a teleconference call on April 28, 2005, with Darlene Goering and Kathryn Chamberlain, regarding the response to specific comment 4, a revised Section 5 will be submitted to the New Mexico Environment Department by July 30, 2005.

If you have any questions, please contact Mark Thacker at 505-665-5342 or Woody Woodworth at 505-665-5820.

Sincerely,

for

David McInroy, Deputy Program Director
Environmental Remediation and
Surveillance Program
Los Alamos National Laboratory

Sincerely,

David Gregory, Federal Project Director
U. S. Department of Energy
Los Alamos Site Office

DM/DG/MG/sm

10831

Enclosures: 1) Response to the notice of "Approval with Modifications for the Investigation Work Plan for Delta Prime Site Aggregate Area, at Technical Area 21"
2) Certification by ENV-ERS Program Technical Representatives

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S. Yanicak, NMED-OB
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K. Chamberlain, NMED-HWB
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J. Young, NMED-HWB
C. Voorhees, NMED-OB

CERTIFICATION

CERTIFICATION BY THE ENVIRONMENTAL STEWARDSHIP– ENVIRONMENTAL REMEDIATION & SURVEILLANCE PROGRAM TECHNICAL REPRESENTATIVES

Document Title: **RESPONSE TO THE NOTICE OF "APPROVAL WITH MODIFICATIONS FOR THE INVESTIGATION WORK PLAN FOR THE DELTA PRIME SITE AGGREGATE AREA, AT TECHNICAL AREA 21"**

I certify under penalty of law that these documents and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violation.

Name: Gabriela Z. L.E. for Date: 5/12/05

David McInroy, Deputy Program Director
Environmental Remediation and Surveillance Program
Los Alamos National Laboratory

or

_____ Date: _____

Ken Hargis, Division Leader
Environmental Stewardship Division
Los Alamos National Laboratory

David R. Gregory Date: 5/13/05

David Gregory, Federal Project Director
Environmental Restoration Program
Department of Energy/Los Alamos Site Office

or

_____ Date: _____

John Ordaz,
Assistant Area Manager of Environmental Projects
Department of Energy/Los Alamos Site Office

Response to the "Approval with Modifications for the Investigation Work Plan for Delta Prime Site Aggregate Area at Technical Area 21, Los Alamos National Laboratory"

INTRODUCTION

This submittal is the response by Los Alamos National Laboratory (LANL) to the "Approval with Modifications for the Investigation Work Plan for Delta Prime Site Aggregate Area at Technical Area 21, Los Alamos National Laboratory," issued by the New Mexico Environment Department (NMED) Hazardous Waste Bureau on April 13, 2005, and received by LANL on April 15, 2005. The "Investigation Work Plan for Delta Prime Site Aggregate Area at Technical Area 21" (ER2004-0409) was submitted by LANL to NMED in August 2004.

To facilitate review of these responses, NMED's comments are included verbatim below. The comments are divided into general and specific categories, as presented by NMED. LANL's responses follow each NMED comment.

GENERAL COMMENTS

NMED Comment

5. *The table developed by the Permittees to satisfy the requirements of Section IX.A of the Consent Order, dated March 1, 2005 (Order), is unacceptable. The information included in the 'summary' column of the table states what the standard operating procedure (SOP) is and what it encompasses. There is no description of investigation, sampling or analytical methods and procedures in sufficient detail to evaluate the quality of acquired data, which is specifically stated in Section IX.A, Standard Operating Procedures, of the Order. The Permittees must revise and resubmit the table to include descriptions of the proposed field and laboratory methods and procedures. (Submit to NMED within 30 days of receipt of this letter)*

LANL Response

5. The table has been revised to provide descriptions of proposed methods outlined in the applicable standard operating procedures (SOPs). The revised table is provided as Attachment A.

NMED Comment

7. *NMED agrees with the Permittees' response to this comment with the exception of the proposed analytical suite. The Permittees state that, in accordance with NMED's NOD for the MDA U work plan, they will "complete a full analytical suite on the selected sample, exclusive of explosive compounds and volatile organic compounds (VOCs)." NMED concurs that because this extended sampling is in an outfall area, field screening or laboratory analysis will most likely not detect VOCs. However, this is not the case for explosive compounds. The Permittees must select their most contaminated sample based on field screening results, and complete a full analytical suite on the selected sample, including explosive compounds. VOCs analysis may be excluded.*

LANL Response

7. LANL concurs with NMED. The most contaminated sample based on field screening will be analyzed for full suite, including explosive compounds.

NMED Comment

8. *The table provided by the Permittees in the work plan (Table 1.2-2) lists all of the SWMUs and AOCs, regardless of status, within the DP Site and Middle Los Alamos Canyon Aggregate Areas. However, it does not specify which SWMUs/AOCs are in the DP Site Aggregate Area and which are included in the Middle Los Alamos Canyon Aggregate Area. The Permittees must revise and resubmit the table so that it identifies in which aggregate area each SWMU/AOC is located. (Submit to NMED within 30 days of receipt of this letter)*

LANL Response

8. As explained in section 1.2 of the work plan, Tables 1.2-1, 1.2-2, and 1.2-3 list all solid waste management units (SWMUs) and areas of concern (AOCs), regardless of status, within the DP Site Aggregate Area only. These tables do not include SWMUs or AOCs that are in the Middle Los Alamos Canyon Aggregate Area.

SPECIFIC COMMENTS

NMED Comment

3. *The Permittees must submit the revised Table 4.3-1 within 30 days of receipt of this letter.*

LANL Response

3. Table 4.3-1 has been revised to reflect the changes in sampling intervals for augerhole AH-1. (The revised table is provided as Attachment B.)

NMED Comment

4. *The Permittees must submit the revised Section 5.0 within 30 days of receipt of this letter.*

LANL Response

4. Per the teleconference call held at 9:00 a.m. on April 28, 2005, with NMED representatives Kathryn Chamberlain and Darlene Goering, it was agreed the revised section 5 will be submitted to NMED by July 30, 2005.

NMED Comment

6. *The Permittees did not respond to the comment. NMED asked specifically about the 'sampling guidance document' and not the 'appropriate SOPs' referenced in their statement. The Permittees must explain what 'sampling guidance document' they are referring to and provide the appropriate reference information and descriptions of procedures. (Submit to NMED within 30 days of receipt of this letter)*

LANL Response

6. The phrase "sampling guidance document" will be deleted from the text. No such document exists. The intent was to reference only the appropriate SOPs.

NMED Comment

7. *The Permittees must submit the revised text from Section 6.1.4 within 30 days of receipt of this letter.*

LANL Response

7. Section 6.1.4 has been revised to reflect the field-screening methodology outlined in Section IX.B.2.d of the Consent Order. (The revised section is provided as Attachment C.)

NMED Comment

9. *Contrary to the Permittees' statement, Section X.D of the Order does outline borehole abandonment procedures. "The open borehole can then be pressure grouted (via the tremie pipe method) from the bottom of the borehole to the ground surface. After the grout has cured, the top two ft of the borehole shall be filled with concrete to insure a secure surface seal." The Permittees must follow the procedures in Section X.D of the Order.*

LANL Response

9 Section X.D ("Well Abandonment") of the Consent Order presents methods for abandoning wells. This section does not specifically address abandoning boreholes that have not been completed as wells. As described in Section X.D, the goal of the well abandonment is to seal the borehole in such a way that the well cannot act as a conduit for the migration of contaminants from the ground surface to the aquifer. The potential for migration of contaminants from the surface to an aquifer is much lower for shallow boreholes, such as those being installed for the DP Site investigation, than for wells in which the borehole already extends into the aquifer. Abandonment of the shallow boreholes (0–20 ft) by returning drill cuttings should achieve the borehole abandonment goals presented in Section X.D and is consistent with other routine practices, such as backfilling excavations with soil rather than grout.

NMED Comment

14. *NMED does not approve the Permittees' plan for handling Investigation Derived Waste (IDW). Specifically, the Permittees may not return drill cuttings, decontamination water, Personal Protective Equipment (PPE), or other IDW to their point of origin. Rather, the Permittees must contain all IDW, and characterize it to ensure proper handling, including but not limited to, final disposal in accordance with Sections IX.B.2.b.iv and IX.B.5 of the Order.*

    Whether the waste is RCRA hazardous or low-level only, the Permittees may not return environmental media to the point of origin because, by doing so, the Permittees will change the hydraulic characteristics of the unit(s) and may provide a conduit for contaminant migration. All boreholes must be properly plugged and abandoned following Section X.D of the Order.

    In their description of the methods and procedures used to characterize and manage all IDW, the Permittees may not substitute a reference to their SOPs for a description of its procedures (See general comment #5).

    Drill cuttings, purge and decontamination water, PPE, and all other IDW must be containerized and characterized prior to disposal. Each container of waste generated must be properly labeled immediately following containerization. All IDW must be sampled and analyzed for contaminants that are suspected or detected prior to or during investigation activities. All suspected radioactively contaminated waste/material should be sampled or surveyed for radionuclides. All IDW must be disposed of properly at an appropriate disposal facility. Descriptions of the methods used to store, control, and transport each waste type and classification must be included in the investigation report.

    The RCRA regulations (40 CFR 262.11(c)(2)) regarding Acceptable Knowledge (AK) to make a hazardous waste determination are vague, but allow old analytical data to be used as a form of AK. However, one caveat is that analytical equipment and sampling techniques have improved significantly. Constituents that were not detectable using outdated sampling and analytical methods may now be detectable with more sophisticated equipment and procedures. This, combined with the fact that historical data and previous sampling results for SWMUs/AOCs within the DP Site Aggregate Area are sparse and unreliable, increases the chances for improper or illegal disposal if a knowledge-based assessment is the only method employed to make a hazardous waste determination. As a reminder, these regulations (40 CFR 262.11(c)(2)) state that AK can be used to determine if a waste is characteristic, not if it is listed. Therefore, the Permittees must provide all data used as a form of AK. This should include, all samples that had detects above Background Values (BV) or Estimated Quantitation Limits (EQLs). In cases where detection limits were higher than BV, that data must also be included. The Permittees must also submit all associated QA/QC data so that NMED can determine if the information is sufficient to meet the requirements of AK. (Submit to NMED within 30 days of receipt of this letter)

LANL Response

14. With respect to the second paragraph: Returning excess soil from the surface and shallow subsurface sampling to the point of origin will not necessarily provide a conduit for contaminant migration (see response to specific comment 9).

    With respect to the fifth paragraph: LANL was not referring to the use of historical data and previous sampling results other than for the purpose of making an initial determination of the expected regulatory status of the investigation-derived waste (IDW). The "acceptable knowledge" (AK) in LANL's response to the notice of disapproval refers to using the results from analyzing the

environmental samples collected during the current investigation in lieu of directly sampling IDW which consists of environmental media or materials contaminated with the environmental media. For example, spent personal protective equipment (PPE) would not be sampled but would be characterized based on the results of analyzing the media the PPE had been in contact with. Because historical data are not being used to make final determinations of waste characteristics, the information requested in NMED's comment does not need to be provided. The data collected during the DP Site Aggregate Area investigation that are used for waste characterization (e.g., sample analyses used for AK) will be provided in the investigation report, per the requirement of Section XI.C.14.d of the Consent Order.

ATTACHMENT A

Brief Description of Field Investigation Methods

Method	Summary
Spade-and-Scoop Collection of Soil Samples	This method is typically used for collecting shallow (i.e., approximately 0–12 in.) soil or sediment samples. The "spade-and-scoop" method involves digging a hole to the desired depth, as prescribed in the sampling and analysis plan, and collecting a discrete grab sample. The sample is typically placed in a clean stainless-steel bowl for transfer into various sample containers.
Hand Auger Sampling	This method is typically used for sampling soil or sediment at depths of less than 10–15 ft but may, in some cases, be used for collecting samples of weathered or nonwelded tuff. The method involves hand-turning a stainless-steel bucket auger (typically 3–4 in. inner diameter), creating a vertical hole which can be advanced to the desired sample depth. When the desired depth is reached, the auger is decontaminated before advancing the hole through the sample depth. The sample material is transferred from the auger bucket to a stainless-steel sampling bowl before filling the various required sample containers.
Split-Spoon Core-Barrel Sampling	In this method, a stainless-steel core barrel (typically 4-in. inner diameter, 2.5 ft long) is advanced using a powered drilling rig. The core barrel extracts a continuous length of soil and/or rock that can be examined as a unit. The split-spoon core barrel is a cylindrical barrel split lengthwise so the two halves can be separated to expose the core sample. Once extracted, the section of core is typically screened for radioactivity and organic vapors, photographed, and described in a geologic log. A portion of the core may then be collected as a discrete sample from the desired depth.
Headspace Vapor Screening	Individual soil, rock, or sediment samples may be field-screened for volatile organic compounds by placing a portion of the sample in a plastic sample bag or in a glass container with a foil-sealed cover. The container is sealed and gently shaken, and allowed to equilibrate for 5 min. The sample is then screened by inserting a photoionization detector probe into the container and measuring and recording any detected vapors.
Portable XRF Field Screening	A portable XRF analyzer may be used to measure metals content in soils in the field to provide screening data and guide sample collection to determine the extent of metals contamination. The instrument includes sealed radioactive sources and can identify and quantify 26 elements. The instrument must be properly warmed up and calibrated according to manufacturer's directions before use. Soil samples should be homogenized and have large rocks, vegetation, and any foreign objects removed (samples may be sieved); the sample surface should be flattened or smoothed with a trowel or similar tool. For quantitative work, reference standard materials should be analyzed and the precision of the instrument determined at least once per day or once for every 20 samples. Precision may be determined by performing multiple analyses of certified reference standard materials.

Method	Summary
Handling, Packaging, and Shipping of Samples	Field team members seal and label samples before packing and ensure that the sample and transport containers are free of external contamination. Field team members package all samples so as to minimize the possibility of breakage during transportation. After all environmental samples are collected, packaged, and preserved, a field team member transports them to either the Sample Management Office (SMO) or an SMO-approved radiation screening laboratory under chain-of-custody. The SMO arranges to ship samples to analytical laboratories. The field team member must inform the SMO and/or the radiation screening laboratory coordinator when levels of radioactivity are in the action-level or limited-quantity ranges.
Sample Control and Field Documentation	The collection, screening, and transport of samples is documented on standard forms generated by the SMO. These include sample-collection logs, chain-of-custody forms, and sample-container labels. Collection logs are completed at the time of sample collection and are signed by the sampler and a reviewer who verifies the logs for completeness and accuracy. The corresponding labels are initialed and applied to each sample container, and custody seals are placed around container lids or openings. Chain-of-custody forms are completed and assigned to verify that the samples are not left unattended.
Field Quality Control Samples	Field quality-control samples are collected as directed in the Consent Order as follows: Field Duplicate: At a frequency of 10%, collected at the same time as a regular sample and submitted for the same analyses. Equipment Rinsate Blank: At a frequency of 10%, collected by rinsing decontaminated sampling equipment with deionized water, which is collected in a sample container and submitted for laboratory analysis. Trip Blanks: Required for all field events that include the collection of samples for volatile organic compound (VOC) analysis. Trip blanks containers of certified clean sand are opened and kept with the other sample containers during the sampling process.
Field Decontamination of Drilling and Sampling Equipment	Dry decontamination is the preferred method to minimize the generation of liquid waste. Dry decontamination may include using a wire brush or other tool to remove soil or other material adhering to the sampling equipment, followed by using a commercial cleaning agent (nonacid, waxless cleaners) and paper wipes. Dry decontamination may be followed by wet decontamination, if necessary. Wet decontamination may include washing with a nonphosphate detergent and water, followed by a water rinse and a second rinse with deionized water. Alternatively, steam cleaning may be used.
Containers and preservation of samples	Specific requirements/processes for sample containers, preservation techniques, and holding times are based on Environmental Protection Agency guidance for environmental sampling, preservation, and quality assurance. Specific requirements for each sample are printed on the sample collection logs provided by the SMO (size and type of container, i.e., glass, amber glass, polyethylene, preservative, etc.). All samples are preserved by placing in insulated containers with ice to maintain a temperature of 4°C. Other requirements, such as nitric acid or other preservatives, may apply to different media or analytical requests.

ATTACHMENT B

Table 4.3-1
Summary of Proposed Borehole Drilling and Soil Sampling at SWMU 21-024(c)

Objective Addressed	Location Number	Location	Sample Depth (ft)	VOCs	SVOCs	TAL Metals	Cyanide	Nitrates	Perchlorate	Gamma Spectroscopy	Americium-241	Isotopic Plutonium	Isotopic Uranium	Strontium-90	Tritium	Moisture	pH	Dioxins, Furans, HE, PCBs*
Augerhole Sampling																		
Determine if evidence of a leak in the tank is present	AH-1	Center of the septic tank footprint	Tank bottom, 5 ft below tank, and if there is evidence of contamination then every 2 ft until clean soil (i.e., nondetect) is encountered	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine vertical extent of contamination in the outfall	AH-2	Center of the outfall, as close to the canyon edge as feasible	0 to 0.5 1.5 to 2 5 to 5.5	X X X	X X X	X X X	X X X	X X X	X X X	X X X	X X X	X X X	X X X	X X X	X X X	X X X	X X X	
Soil Sampling																		
Determine if releases have occurred from the sewer line	A	Beneath the sewer line immediately south of Building 21-54	Beneath pipe (0 to 0.5), 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine if releases have occurred from the sewer line	B	Beneath the sewer line immediately south of Building 21-61	Beneath pipe (0 to 0.5), 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine if releases have occurred from the sewer line	C	At the connection of the sewer line from Building 21-54 and the sewer line from Building 21-61	Beneath pipe (0 to 0.5), 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine if releases have occurred from the sewer line	D	At approximately half the distance between the septic tank and outfall	Beneath pipe (0 to 0.5), 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine if a release occurred at the connection of the sewer line and the inlet to the septic tank	E	At the connection of the sewer line and the inlet of the septic tank	Beneath connection (0 to 0.5), 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine if a release occurred at the connection of the sewer line and the outlet to the septic tank	F	At the connection of the sewer line and the outlet of the septic tank	Beneath connection (0 to 0.5), 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine vertical extent of release	1	Outfall pipe mouth	Beneath pipe (0 to 0.5), 1.5 to 2, 2.5 to 3	X X X	X X X	X X X	X X X	X X X	X X X	X X X	X X X	X X X	X X X	X X X	X X X	X X X	X X X	

Table 4.3-1 (continued)

Objective Addressed	Location Number	Location	Sample Depth (ft)	VOCs	SVOCs	TAL Metals	Cyanide	Nitrates	Perchlorate	Gamma Spectroscopy	Americium-241	Isotopic Plutonium	Isotopic Uranium	Strontium-90	Tritium	Moisture	pH	Dioxins, Furans, HE, PCBs*
Determine eastern extent	2	2 ft east of outfall pipe mouth	0 to 0.5, 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine western extent	3	2 ft west of outfall pipe mouth	0 to 0.5, 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine lateral extent of release	4	10 ft downslope of outfall pipe mouth	0 to 0.5, 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine eastern extent	5	10 ft east of location 4	0 to 0.5, 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine western extent	6	10 ft west of location 4	0 to 0.5, 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine lateral extent of release	7	1 ft downslope of 21-01392	0 to 0.5, 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine eastern extent	8	20 ft east of 21-01392	0 to 0.5, 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine western extent	9	20 ft west of 21-01392	0 to 0.5, 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine downslope extent (on the topographical bench)	10	Directly downslope from pipe mouth, beside cliff	0 to 0.5, 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine eastern extent	11	20 ft east of location 14	0 to 0.5, 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine western extent	12	20 ft west of location 14	0 to 0.5, 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine downslope extent	13	On the topo bench, directly downslope from pipe mouth, beside southern cliff edge	0 to 0.5, 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine eastern extent	14	20 ft east of location 17	0 to 0.5, 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	
Determine western extent	15	20 ft west of location 17	0 to 0.5, 1.5 to 2	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	X X	

*Based on field-screening results, the most contaminated sample will also be analyzed for dioxins, furans, high explosives (HE), and polychlorinated biphenyls (PCBs).

ATTACHMENT C

6.1.4 Field Screening

One or more of the following screening methods may be used: (1) visual examination, (2) headspace vapor screening for VOCs, and (3) metals screening using X-ray fluorescence (XRF). Additional screening for site- or release-specific characteristics such as pH, HE, or for other specific compounds using field test kits may be conducted, if appropriate.

Samples will be field-screened for gross alpha radiation using a Model 139 rate meter and for beta/gamma radiation using an Eberline Smart Portable (ESP)-1. Samples will be field-screened for organic vapors using a photoionization detector (PID). Cores collected by split-spoon core barrel will be screened immediately upon opening the core barrel, and any visibly stained or discolored zones, fractures, or clay-rich weathered zones will be noted. Samples collected by spade-and-scoop or hand-auger methods will be screened in the collection bowl or sample container immediately after the sample is collected. Screening values will be recorded in the appropriate spaces on the corresponding sample-collection logs at the time of sample collection. If field-screening results are used to change the planned sample interval or to collect additional samples, the modification will be recorded in the appropriate sample collection log and in the field notebook. At each site, field screening will determine the sample(s) with the highest radionuclide and/or organic contamination. The samples will be analyzed for four additional analyses: PCBs, high explosives, dioxins, and furans. Field-screening instruments will be checked at least daily for proper operation and checked at least daily against calibration standards, as appropriate.