



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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



May 26, 1999



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Mr. James Bearzi, 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 22-012 and 22-015(a,b,d,e), LA-UR-99-1077, EM/ER:99-068, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Bearzi:

The Environmental Protection Agency (EPA) has reviewed LANL's SAP for SWMUs 22-012 and 22-015(a,b,d,e) dated March 30, 1999, 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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HSWA LANL 5/11/11 / 22

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Comments and Recommendations on LANL's Sampling and Analysis Plan for SWMUs 22-012 and 22-015(a,b,d,e)

This SAP includes the following SWMUs: 22-012, a concrete wash pad; 22-015(a), inactive seepage pits; 22-015(b), inactive explosives sump; 22-015(d), an inactive drainline and inactive seepage pit; and 22-015(e), an inactive explosives sump. A marsh area approximately 10 feet away from the seepage pits will be addressed in the Two-Mile Canyon watershed aggregate workplan.

Comments/Recommendations

1. **General Comment:** For SWMUs 22-015(b) and 22-015(d), LANL shall also sample underneath areas of the drainlines that are disconnected as is the case in Figure 2.1-3, page 10 of the sampling plan.
2. **General Comment:** At the time of the review, EPA did not have the SOPs that LANL refers to in the sampling plan. NMED will need to review these to determine whether they are adequate.
3. **General Comment:** In NMED's rejection letter of the RFI Report for the SWMUs 22-012 and 22-015(a,b,d,e), there is comment that LANL address SWMUs 22-014(a), 22-014(b) and 40-005. They were not addressed in the sampling plan. Is NMED requiring these SWMUs to be investigated under a different workplan?