



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
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Terri D *JK*

DEC 20 1996



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

RE: Los Alamos National Laboratory Sampling and Analysis Plan
for PRS 33-008(c), EPA I.D. No. NM0890010515

Dear Mr. Garcia:

The U.S. Environmental Protection Agency (EPA) has completed a technical review of the Los Alamos National Laboratory (LANL) Sampling and Analysis Plan for Potential Release Site (PRS) 33-008(c) dated July 23, 1996. The EPA has found the plan to be deficient and enclosed is a list of deficiencies which EPA recommends that LANL be allowed sixty days to respond.

If you have any questions or need additional information, please contact Mr. Allen T. Chang of my staff at (214) 665-7541.

Sincerely yours,

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

Enclosure



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**LIST OF DEFICIENCY
LANL SAP for PRS 33-008(c)**

Site Specific Comments:

1. Page 3, last paragraph; in phrase "sample AAA2086 from a point 50 ft southwest of drainage," Should this state "southeast" instead of "southwest"? (Best Professional Judgement (BPJ))
2. Page 4, Figure 1: Please explain:
 - i) Two types of expressions (closed circle and open circle) were used to show potential borehole locations. What is the difference between them?
 - ii) Are the potential borehole locations different from the actual sample locations? Explain the difference.
 - iii) The physical locations of buried area and trench areas showed in Figure 1 and showed in Figures 1 and 2 of Appendix A do not seem to match. Please explain and identify the corresponding areas in these figures in Appendix A.
 - iv) According to the figure, there are total 12 potential sample locations; however, on Page 5, Section 2.2, it states, "Samples will be collected from a minimum of four boreholes located within the disposal areas". Why does the number of sample locations reduces from 12 to four. (BPJ)
3. On Page 5, last paragraph, the plan specifies "a minimum of 4 boreholes located within the disposal areas." On Page 9, second paragraph and last paragraph, the plan specifies a minimum of 4 boreholes in each the primary disposal area and the area south of the culvert. A minimum of 4 boreholes in **each area** is necessary and the Page 5 reference should be clarified.

Further, 2 of the 4 boreholes in the primary disposal area shall be located to sample the bottom of the ravine as it existed prior to placement of the fill. (BPJ)
4. Page 9, 3rd paragraph: Since SVOCs could stay in the soil longer than VOCs, the borehole cores screening shall include SVOC besides radioactivity and VOCs, as specified in Table 2.2-1. (BPJ)

5. Clarify meaning of terms "soil" and "fill". In some places it appears terms are interchangeable. In other usages, it seems fill may refer to covered waste; e.g., on Page 5, statement is made that samples will include soil and fill. (BPJ)

Appendix A: Geophysical Investigation

6. What information is contoured on Appendix A, Figures 1 and 2? What are units? (BPJ)
7. Maps attached to Appendix A need directional orientation. (BPJ)
8. Page 4; 5th paragraph: "...outline on Figure 2 (TDMD Data)", Should Figure 2 be Figure 1? (BPJ)
9. Page 5, Section 2.4: Although TDMD and EM data indicate that no buried objects or debris are expected to occur below the trenches, the bottom of the trenches might deposit hazardous chemicals. Therefore, soil samples from 2-ft below the bottom of the trench area must be included in the sampling and analysis plan to characterize the possible presence of COPCs. (BPJ)