



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

*Step - If you confer with EPA
Please advise the appropriate
actions & notify 2 weeks DOE -
If you disagree please advise
EPA & provide
your rationale.
actions take
5/8/98*

APR 03 1998

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

Re: Modifications on the RCRA Facility Investigation Workplan
RFI for TA 35, PRSs 35-003(j,k), 35-014(d), 35-015(b), 35-
009(d) 35-014(e2), and 35-016(i), Los Alamos National
Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed
LANL's RFI Workplan for TA 35, dated June 1997 (received by EPA
12/12/97), and has found the Workplan to be approvable with
modifications. Enclosed are the modifications for your review.

Please note that this approval only applies to the PRSs
identified above. Some of the PRSs in the Workplan were being
investigated for radionuclides only. EPA did not review those
PRSs.

In July of 1997, EPA issued a NOD letter to NMED on the RFI
Report for TA-35 PRSs. The NOD letter required that LANL take
additional soil samples at PRSs 35-014(e2), 35-016(i) and 35-
009(d). LANL did not provide the sampling for those PRSs in the
June 1997 Workplan. Therefore, EPA has included the required
sampling for those PRSs in this approval letter.

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 on the Sampling Plan for TA 35 PRSs

This Sampling Plan includes the following PRSs: 35-003(j & k), 35-009(d), 35-014(d), 35-014(e2), 35-015(b) and 35-016(i). A total of 7 PRSs.

PRSs 35-003(j,k), 35-014(d) and 35-015(b)

General Comment: EPA will require a six foot boring at the following Phase I soil sampling locations: 35-086, 35-2081, 35-2291, 35-2089, and 35-2090; this is in addition to the borings proposed by LANL in the Workplan. The borings must be completed to six feet, regardless of the depth to tuff. The samples shall be analyzed for the same constituents as the samples proposed by LANL and sampled at the same intervals.

PRSs 35-009(d)

General Comment: LANL shall take deeper samples at Phase I soil sampling locations 35-2046, 35-2047, and 35-2048. Samples shall be taken from 2.5 to 3 feet and analyzed for the same constituents as in the Phase I soil sampling.

PRSs 35-014(b)

EPA is not convinced that the sample taken during the Phase I soil sampling was located where the spill occurred. EPA will require an additional sample be taken in the asphalt area where the leaking drums were located, in addition to the sample location proposed by LANL in the Workplan. The samples shall be analyzed for the same constituents as the samples proposed by LANL. Also, if contamination is found at the 2-3 foot interval in either boring, then LANL must sample deeper.

PRSs 35-014(e2) and 35-016(i)

LANL shall take a deeper sample (2.5-3 foot) at the Phase I soil sampling location 35-2165. The samples shall be analyzed for the same constituents as the samples in the Phase I investigation. If contamination is found at the 2-3 foot interval, then LANL must sample deeper.