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 Los Alamos Area Office
 Los Alamos, New Mexico 87544

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 DIVISION
 DEPARTMENT OF ENERGY

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Ms. Guanita Reiter, Acting Chief
 RCRA Permits Branch
 U. S. EPA, Region 6
 1445 Ross Ave., Suite 1200
 Dallas, Texas 75202-2733

Dear Ms. Reiter:

In planning for soil sampling at Aggregates five and six, and Materials Disposal Area (MDA) C of OU 1147 during the coming year, we have found some minor changes that we feel we must make to improve the OU 1147 Facility Investigation Work Plan as it now exists. The proposed changes are listed below:

Surface and Near Surface Soil Sampling Method

Sections 5.1.2.5.2 (page 5-27) and 5.2.1.2 (page 5-39) specify the use of a 6-inch stainless steel coring ring pushed into the ground for sample collection. Instead of using the 6-inch coring tool, we propose to use the spade and scoop method (LANL-ER-SOP-06.09) for collection of soil samples. In this method, a volume of soil approximately 12 inches in diameter and 12 inches in depth, will be collected at each sampling point with stainless steel scoops. The soil will be homogenized *in situ* (in the small hole excavated to take the sample) and then sample aliquots will be removed from the homogenized sample and placed in the appropriate sample containers. The samples are homogenized *in situ* in order to preclude generation of liquid waste. This method of sample collection and homogenization was previously used at OU 1078 and verified by members of your staff.

Laboratory Analyses

The sampling plans in Chapter 5 specify that field laboratory measurements will be conducted for gross alpha, gamma spectrometry, tritium, volatile organic compounds, Polychlorinated Biphenyl (PCBs), and soil moisture through the use of a mobile laboratory van. Instead of a mobile laboratory van, we propose to use the permanent EM-9 analytical chemistry facilities because they are approximately 1 mile away from OU 1147 and because real-time data is not required during this phase of sampling.



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Analytes

Instead of laboratory analysis for total uranium, we propose that total uranium be determined through the isotopic uranium analysis, which will give higher quality results. Metals to be analyzed will be Ag, As, Ba, Be, Cd, Cr, Hg, Ni, Pb, Sb, Se, and Tl.

Sampling at Ten Site and Mortandad Canyon Outfalls

In Section 5.1.2.6.2 (page 5-29), it is stated that one-third of the 213 samples (132 at TSO and 81 at MCO) will be submitted for laboratory analysis. The section does not make clear which third will be selected for submittal. To clarify this section, we propose to select randomly, through the use of a random number table, a third of the samples collected at the surface, a third of the samples collected at the 12-inch depth, and a third of the samples from the 36-inch depth, and submit these for laboratory analysis.

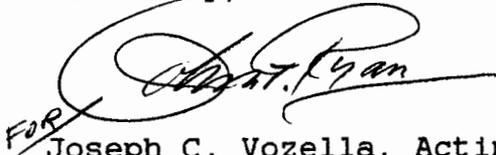
Replicate Sampling

Laboratory analysis of replicate samples is specified in the work plan for MDA C, but no replicate sampling is proposed for the unpaved areas of OU 1147 and for Ten Site and Mortandad Canyons. We propose that, for the samples to be submitted for laboratory analysis, an additional 10 percent be selected for replicate laboratory analysis. This will be an additional six samples for the unpaved areas and seven samples for Ten Site and Mortandad Canyons.

These minor changes will facilitate more effective field sampling activities. We hope to begin this field work in mid May unless you advise us that you do not approve of these changes.

If you have any questions, please contact Steve Slaten of my staff at FTS 8-505-665-5050, or Cheryl Rofer of Los Alamos National Laboratory (LANL) at FTS 8-505-667-2988, or Tracy Glatzmaier also of LANL at FTS 8-505-665-2613.

Sincerely,



For
Joseph C. Vozella, Acting Chief
Environment, Safety and Health
Branch

LESH:9SS-004

cc:
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Ms. Guanita Reiter

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cc:

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