



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

*Lon K ✓*  
*Do you agree with this?*  
*Bomb*

*File*

JUL 18 1994

*OK* / *AKC*  
*7/25/94*

*Passive*  
*7/29/94*

Mr. Don Krier  
OU 1148 Project Leader  
Los Alamos National Laboratory  
EES-1, Geology and Geochemistry MS J577  
Los Alamos, NM 87545

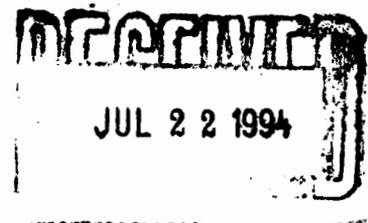
Re: Use of Emflux samplers at OU 1148  
Los Alamos National Laboratory (NM0890010515)

Dear Mr. Krier:

The Environmental Protection Agency (EPA) has reviewed your draft report dated May 3, 1994 on the passive soil gas data collected with Emflux cartridges in Operable Unit (OU) 1148.

EPA has found the approach used to estimate the extent and semiquantitative nature of the plume to be acceptable. The Emflux methodology may be used for this specific application; however, Los Alamos National Laboratory (LANL) should note that subsurface geology may have a significant impact on the comparison of results. Subsurface discontinuities in soil or rock formations may cause VOC migration to be greater in some areas than others.

EPA does not recommend that this methodology be used for quantitative estimates of VOC emission rates, nor for estimation of human or environmental health risk assessments. EPA's concern is based on several factors such as the inherent lack of control of the air volume sampled with a passive device, lack of sufficient quality control to confirm desorption of all VOCs from the sample media, and a preference for the use of whole air sampling devices wherever possible.

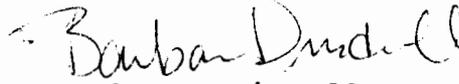


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*TK*

LANL may proceed with the additional proposed sampling at OU 1148 using the Emflux methodology. Should you have any questions, please contact me at (214) 655-7441, and after August 1, 1994 at (214) 665-7441.

Sincerely,



Barbara Driscoll, Geologist  
New Mexico-Federal Facilities  
RCRA Permits Branch

cc: ✓ Mr. Benito Garcia, Bureau Chief  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department

Mr. Jorg Jansen, Program Manager  
Environmental Restoration Program  
Los Alamos National Laboratory, M992