



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

*Sta/Steph/John &  
Please forward these comments  
to DOE/LANL by 2/19/99 or  
resend to EPA by the same  
date with your rationale. Benito  
2/16/99*



Mr. Benito Garcia, 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 SWMU Group 73-2, LA-UR-98-4076, EM/ER:98-452, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed LANL's SAP for SWMU Group 73-2 dated November 30, 1998, 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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*about LANL 1/10/71/73*

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### **Comments and Recommendations on LANL's Sampling and Analysis Plan for SWMU Group 73-2**

This SAP includes the following SWMUs and AOCs: 73-003, the Steam Cleaning Facility; 73-004(a), a septic tank that served the incinerator building; 73-004(b), a septic tank that served the steam cleaning facility; 73-005, a surface disposal area near north edge of DP Canyon; 73-006, two drainlines that served the incinerator building; 73-007, a steel septic tank near the southern edge of East Mesa; and, C-73-005(a-f), six unlined septic pits on East Mesa, south of state road NM 502.

#### **Comments/Recommendations**

1. In the SAP, for each SWMU, LANL has a table which includes the proposed sampling locations and depths for Phase II. The table indicates that a "deeper sample" will be taken at the Phase I location; however, the approximate depth of the sample is not included in the table. NMED will require that each "deeper sample" be taken at least 2 foot below the Phase I sampling depth.
2. For SWMU 73-004(b), if field screening instruments indicate VOC contamination, then LANL shall analyze the soil samples for VOCs.