



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

March 25, 1996



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

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed the February 8, 1996 responses to the OU 1332, Foothills Test Area RFI Work Plan submitted by the U.S. Department of Energy (DOE)/Sandia National Laboratories (Sandia). EPA recommends approval of the Foothills Test Area RFI Work Plan with the attached modifications.

There are two other issues associated with this work plan. The first is that EPA requested that Sandia provide summary tables or figures that include ground water quality data for the ground water wells and springs within and directly adjacent to the Foothills Test Area. Sandia responded by citing the various reports which contain this information. EPA recognizes that this information has been previously submitted to EPA and NMED, however, it would be helpful to have this data succinctly summarized in the work plan. EPA recommends that this requirement be imposed on all future RFI Work Plans. *

The second issue is that no project schedule was submitted with this work plan. EPA understands that DOE/Sandia is currently preparing project schedules for each of the solid waste management units (SWMUs) addressed in the Foothills Test Area RFI Work Plan. It is unclear when these schedules will be available. In the absence of the project schedules, EPA recommends that the RFI Work Plan for the Foothills Test Area be approved with an RFI Report due date of 12 to 15 months from the date of work plan approval. Alternatively, upon receipt of the individual project schedules, the Work Plan could be approved with different RFI Report due dates for each SWMU.

Lastly, please note that EPA's Notice of Deficiency (NOD) did not include NMED comments, which were not ready at the time of NOD issuance on November 2, 1995. As such, EPA's approval recommendation is based solely upon a reconciliation of EPA NOD comments.

SNL 1064



If you have any questions, please contact Nancy Morlock of my staff at (214) 665-6650.

Sincerely yours,


David W. Neleigh, Chief
New Mexico-Federal Facilities

cc: Mr. Ron Kern
New Mexico Environment Department

**Approval with Modifications
Foothills Test Area RFI Work Plan
Sandia National Laboratories**

1. EPA requested that Sandia revise Section 5.3.6.5 to include a soil boring at the center of Feature S. In its response, Sandia stated that Feature Z would be sampled instead because it represented the "worst case". EPA recommends that Feature S be sampled regardless, since information gained through interviews and from historical records may be incomplete.

2. For Section 5.3.9.2, page 5-87, Sandia states that "If VOCs in the groundwater are above action level additional monitoring wells will be installed as appropriate." This statement would be more appropriately worded as "If VOCs are detected in the groundwater, additional monitoring wells will be installed as appropriate, and as required by the Administrative Authority." As originally worded, this statement implied that monitoring wells would only be installed if action levels were exceeded.