

Subject: Comments on the proposed modification

Date: Sat, 15 Apr 2000 15:46:24 -0600

From: "Tom Haney" <haney@srv.net>

To: <steve_zappe@nmenv.state.nm.us>

The proposed modification to reduce the number of headspace analyses is a good one and I applaud the attempt to reduce the cost. However, it may not go far enough for well characterized soils in which VOC have been shown to not be present. In fact, it is difficult to see why VOCs would stick around long enough after shoveling to actually be retained in soils and make it into the waste barrel. I suggest that after a two year period on the reduced sampling plan, if none of the soils/sediments that have been tested/verified at WIPP have shown evidence of VOCs over what is in the original characterization, that you begin trusting all the original characterizations, and quit headspace verification sampling altogether.

The other changes (cresol and pyridine) are fine.

Good luck.

Tom Haney
320 Ronglyn Avenue
Idaho Falls, ID 83401
208-524-5944

