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Los Alamos

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

memorandum

TO: Distribution

DATE: October 1, 1991

FROM: *Micheline Devaurs*
Micheline Devaurs, Project Leader

MAIL STOP/TELEPHONE: M992/7-3131

SYMBOL: EM-13:91-711

SUBJECT: **MEETING WITH ENVIRONMENTAL PROTECTION AGENCY (EPA)
REGION VI DALLAS REGARDING WORK PLAN SCHEDULES**

Attendees:

Steve Slaten, (DOE-LAAO)
Richard Mayer, (EPA VI)
Herb Grover, (NMED)
Jim Aldrich, (EES-1)
Bill Honker, (EPA RCRA Permits)

Lars Sohlt, (EM-13)
Micheline Devaurs, (EM-13)
Dave McInroy, (EM-8)
Bill Gallagher, (EPA RCRA Permits)

These minutes summarize a meeting on September 9, 1991. Notes are Robert Vocke's (Program Manager) clarifications added as appropriate to emphasize important programmatic points.

The major purpose of this meeting was to discuss the schedule for Resource Conservation and Recovery Act (RCRA) field investigation (RFI) field work at the Technical Area (TA) -21 operable unit (OU). The major concern was that not many solid waste management units (SWMUs) would be sampled for several years. I explained the rationale for the field work schedule in the TA-21 Work Plan: that available environmental surveillance data show no threat to human health and the environment, that OU background data are required prior to sampling SWMUs, and that funding constraints compromise the ability to accelerate the schedule. I emphasized the importance of gathering OU background data prior to sampling SWMUs, and detailed that particularly with near-surface contamination, background sampling is needed to distinguish SWMU-related contaminants from OU-wide contamination. Additionally, OU characterization data will support assessment and remediation activities (e.g., support hydrologic and contaminant transport calculations). I also stressed that surface sampling of the entire OU on a 40-m by 40-m grid will address 3 SWMUS regarding surface soil contamination resulting from historical stack emissions.

Bill Gallagher stated that, in EPA's view, funding constraints are not a valid reason to extend schedules. He stated Los Alamos National Laboratory (LANL) would need to demonstrate that environmentally the schedules are protective and that extended schedules do not compromise human health and the environment. Lars Sohlt



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stated that risk calculations using the MEPAS model gave radionuclide and chemical risk indices of 2 to 3×10^{-5} for TA-21. He stated that for TA-1 and the townsites, the number was 10^{-6} . He also stated that he made rough calculations using gross alpha data after TA-21 cleanup and estimated a risk of 10^{-5} using EPA conversions of a concentration in soil to risk. Bill Gallaher asked whether a risk assessment specific to TA-21 had been conducted; the response was no.

The discussion shifted to completion of work plans for townsite SWMUs. Jim Aldrich stated that his work plan for part of the townsite SWMUs would be delivered to EPA in March 1992. No schedules were available for the remaining two townsite OUs. Jim Aldrich stated that for the SWMUs in his OU assessment and remediation would be conducted together (i.e., sample offsite areas and remediate) using a "bias for action". (NOTE: This approach will be implemented dependent upon funding availability and program-wide priorities. If needed, interim actions will be taken. Additionally, risk-based cleanup criteria will be negotiated with EPA; cleanup to background may not be merited unilaterally.) He estimated that 30 of the 66 SWMUs in this OU could be immediately investigated and remediated once the work plan is approved. Jim also stated he would like to visit EPA in mid-October to present the approach in his work plan. Steve Slaten [Department of Energy-Los Alamos Area Office (DOE-LAAO)] suggested that all townsite OUs be addressed at this meeting.

Bill Honker (EPA, RCRA Permits Branch Chief) came late and refocused the discussion on the TA-21 Work Plan schedule. He stated his concerns that first the final RFI report would not be completed until 1997, and second that we need to show faster progress on some SWMUs and complete investigations and remedy selection. We reiterated our approach using technical memoranda as interim RFI reports; however, EPA expressed concern that they could not hold us to this regulatorily. Budgetary constraints, the Five Year Plan, and the Twelve Year schedule to be ready for the corrective measures implementation (CMI) were discussed. [NOTE: The CMI for the first OU (TA-21) is currently scheduled for FY99.]

NOTE: Schedules for the entire ER Program were initially submitted to EPA on September 1, 1991 (Title: FY92 Update of OU Milestones and Schedules). These schedules will be adjusted due to budget constraints and submitted for EPA review and approval in the annual update to the Installation Work Plan in November 1991. Technical memoranda are major milestones in these schedules. The Hazardous and Solid Waste Amendments (HSWA) module also requires quarterly technical progress reports which will give EPA quarterly information on all OUs as they begin RFI field work. Additionally, these schedules have a separate activity for voluntary corrective action (VCA) during both the assessment and remediation phases. The ER Program is structured to provide for delisting of SWMUs, VCA prior to the CMS, and interim measures under the HSWA module in the unlikely event of risk to human health and the environment.

The focus of the discussion reverted back to an accelerated schedule. EPA's preference that we begin the corrective measures study (CMS) directly after completing the RFI on certain SWMUs to show progress was stated by Bill Honker. It was agreed that LANL would submit an addendum to the TA-21 Work Plan with the following information:

- (1) For each technical memo, specifically state the number or range of SWMUs to be addressed and the date this document will be submitted to EPA.
- (2) Estimate when a CMS will be initiated for units where the RFI has been completed.
- (3) Address whether additional SWMUs can be addressed in the first year of the RFI field work.

The meeting concluded with EPA asking Herb Grover (NMED) for his input. (This was the first time a state regulator was present at an ER/EPA meeting.) He expressed a concern that we not merely bean count SWMUs, but that we use criteria to determine why certain SWMUs are addressed first. He also stated that budget constraints did not concern him. He feels we must do what we can within the budget we have.

MD/rfr

Attachment: Meeting Attendees List

TA-21



Distribution:

- S. Slaten, DOE-LAAO, MS A316
- L. Soholt, EM-13, MS K481
- R. Mayer, EPA VI
- H. Grover, NMED
- D. McInroy, EM-8, MS K490
- J. Aldrich, EES-1, MS D462
- B. Gallagher, EPA RCRA Permits
- B. Barnett, IS-11, MS M700
- K. Dowler, CLS-1, MS J585
- R. Ferenbaugh, EM-8, MS K490
- R. Gonzales, EM-13, MS K481
- S. Kelkar, EES-4, MS K485
- L. Maassen EM-13, MS K481
- T. Norris, EM-13, MS K481
- M. Ray, EES-1, MSA M707
- S. Wagner, EM-13, MS K481
- P. Aamodt, EM-13, MS K481
- B. Anderson, CLS-7, MS E525
- R. Conrad, EM-8, MS K490
- G. Eller, INC-DO, MS J519
- T. Glatzmaier, EES-5, MS F665
- G. Gould, MEE-4, MS G787
- T. Hakonson, EES-15, MS J495
- P. Longmire, INC-4, MS C345
- B. Martin, CLS-DO, MS J563
- A. Ogard, INC-7, MS J514
- A. Pratt, EES-13, MS J521
- C. Rofer, EES-1, MS D462
- K. Campbell, A-1, MS F600
- G. Cole, EES-1, MS D462
- C. Duffy, INC-7, MS J514
- C. Eberhart EM-8, MS K490
- H. Ettinger, EM-DO, MS K491
- P. Fresquez, EM-8, MS K490
- B. Gallaher, EM-8, MS K490
- J. Gardner, EES-1, MS D462
- D. Garvey, EM-8, MS K490
- S. Goff, EES-1, MS D462
- E. Kelly, A-1, MS F600
- B. Laughlin, EES-1, MS D462
- C. Leasure, EM-9, MS K484
- C. Loggains, ENG-1, MS M721
- T. Morgan, INC-7, MS J514

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D. Nelson, MEE-4, MS G787
C. Rzeszutko, EM-9, MS K484
L. Trocki, A-4, MS B299
D. York, MEE-4, MS M707
B. Gilkeson, Weston, MS K481
D. Brooks, A-1, MS F600
S. Brown, LC-General, MS A187
D. Broxton, EES-1, MS D462
M. Burgess, IS-11, MS E584
R. Ferenbaugh, EM-8, MS K490
B. Gillis, MEE-4, MS M314
L. Kuiper, EES-4, MS D443
K. West, EES-13, MS J521
A. Youngblood, A-4, MS B299
J. Smith, Weston

Cy: T. Gunderson, EM-DO, MS K491
Rw/R. Vocke, EM-13, MS K481
J. Shipley, ET-AETO, MS D460
RPF, MS M707
EM-13 file

EPA RCRA Mtng on TAZI Schedules

9-9-91

Steve Slaten
Lars Scholt
- Richard Mayhew
Micheline Devours
Herb Groven
DAVE McINROY
JIM ALDRICH
BILL GALLAGHER
BILL HONKER

DOE-LAADO FTS 855-5050
LANL EM FTS 843-2250
EPA 6 FTS 255-6775
LANL Env. Restoration FTS 843-3131
NMED (SOS) 827-2929
LANL/ENVIRON Protection Grp. FTS 843-0819
LANL FTS 843-1495
EPA RCRA PERMITS FTS 255-6775
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J. Shipley, ET-AETO, MS D460
RPF, MS M707
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