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ENVIRONMENTAL RESTORATION
Records Processing Facility
ER Record Index Form

PAGE COUNT: 3

Quick Index: Complete all fields; indicate if not applicable or appropriate; please write legibly.

DOCUMENT TO: Guanita Reiter ORGANIZATION: EPA
ORIGINATOR NAME: Joseph C. Vozella ORGANIZATION: DOE
SYMBOL: LESH:655-097 DOCUMENT DATE: 05/14/93
SUBJECT/TITLE: EPA Approval of Work Plan for TA-21 Operable Unit 1106

RECORD TYPE (Circle relavant type for primary record; type of attachments should be selected on *Keywords List*):

Analytical Data	Excerpt	Map	Procedure	Summary
Article	FAX	Memo	Purchase Request	Table
Chain-of-Custody	Figure	Microform	Receipt Acknowledgment	Telephone Record
Chart	Form	Notebook	Report	TOC
Computer Output	Interview	Outline	Review	Transcription
Contract	Letter	Personal Notes	Sow	Video
Controlled Distribution	List	Photo	Study	Work Plan
Drawing	Logbook	Plan		Other ____

RECORD CATEGORY: P
(P for Programmatic or R for Reference)

RECORD PACKAGE: —

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E)_____ TO:_____ FROM:_____ SYMBOL:_____

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ENVIRONMENTAL RESTORATION
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ER Records Detail Index Form for ER Record I.D. # 31278

DETAIL INDEX: Complete all fields; indicate if not applicable or appropriate; please write legibly.

TECH AREA(S)	ADS NO(S)	STRUCTURE NO(S)/MDA	SWMU/PRS NO(S)
LIST RELEVANT TECH AREA(S).	*LIST RELEVANT ADS NO(S).*	*LIST RELEVANT STRUCTURE NO(S).*	*LIST RELEVANT SWMU NO(S)/PRS.*
21	1106	—	—

DOCUMENT TO	ORIGINATOR NAMES
LIST RELEVANT RECIPIENTS.	*LIST MULTIPLE ORIGINATORS.*
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CORRECTION (Y/N) _____ CORRECTION #: _____

CORRECTION DESCRIPTION:

MISCELLANEOUS (List other indexing criteria as necessary; please write legibly): OU 1106,

Department of Energy
Field Office, Albuquerque
Los Alamos Area Office
Los Alamos, New Mexico 87544

(3)

MAY 14 1993

Ms. Guanita Reiter, Acting Chief
RCRA Permits Branch
U. S. Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

Dear Ms. Reiter:

The Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Work Plan for Technical Area (TA)-21 Operable Unit (OU) 1106 was approved by the Environmental Protection Agency (EPA) in January 1992, after a work plan addendum was submitted in response to EPA's Notice of Deficiency (NOD). A key aspect of the addendum was a revised schedule ("NOD schedule") addressing both the sequence of the TA-21 field investigations, and the content and timing of the technical reports to EPA. The enclosure to this letter is an excerpt from the work plan addendum, showing the scheduled dates and content of the technical reports (quarterly reports and technical memoranda).

As detailed below, circumstances subsequent to our response to the NOD have caused the TA-21 RFI schedule to slip significantly. The consequences are that the commitments in the response to the NOD cannot be met, and that the two technical memoranda scheduled for Fiscal Year (FY) 1993 either cannot be submitted on schedule or cannot contain all the technical information originally intended. Circumstances impacting the two technical memoranda are discussed below.

Technical Memorandum 1. Unexpected long turnaround times are being experienced for samples collected in FY 1992 (six to eight months for radioactive contaminants, compared to the expected two months). These delays impact data from several FY 1992 field investigations including: OU-wide grid surface soil sampling, outfall surface soil sampling, and filter building footprint surface soil sampling. The delay in receiving analytical results makes it impossible to report on these investigations in Technical Memorandum 1 on June 14, 1993.

In addition, a portion of the outfall investigations could not be conducted because of National Emission Standards for Hazardous Air Pollutants (NESHAP) compliance issues associated with drilling operations in a radioactively contaminated environment. These investigations will be rescheduled at the first opportunity, which currently appears to be during the summer of 1994.

However, the following other major field activities conducted in FY 1992 have maintained their schedule and can be reported as planned: geologic mapping, fault and fracture measurements, geomorphic mapping, stratigraphic section measurements, and outcrop mineralogy studies.

Received by ER-RPF
FEB 14 1994
YCG

We will report the work not impacted by analytical delays or NESHAP compliance issues in a Technical Memorandum 1A, as scheduled on June 14, 1993. We propose to report on the investigations delayed by slow analytical turnaround in a follow-up Technical Memorandum 1B, which we propose to submit on December 14, 1993. This six-month delay is consistent with the six-month delay in receiving analytical results. The work postponed because of NESHAP compliance issues will be included in the FY 1994 field investigations and will be reported in Technical Memorandum 3, the schedule for which is presently unaffected (see enclosure).

Technical Memorandum 2. Funding received in FY 1992 was insufficient to perform the vadose zone and Area V investigations scheduled to begin in the summer of 1992. The investigations were not started, and cannot be reported in Technical Memorandum 2 scheduled for September 29, 1993, nor in the intervening quarterly technical progress reports. The delay of these initial subsurface investigations also will impact all subsequent subsurface investigations, which depend on the information that was to be acquired in the initial work.

There is no recourse for this schedule slippage except to reschedule the work for a later time. At present, it appears that the earliest possible start date for these subsurface investigations is June 1994. This is a two-year delay from the original schedule, and assumes adequate funding in FY 1994 and FY 1995.

For the vadose zone and Area V investigations, and subsequent dependent investigations, we propose to prepare a new schedule as follows: Technical Memorandum 2 will be due in late summer 1995, with the dependent Technical Memoranda 4, 6, 8, and 9 following at approximately one-year intervals. Overall, this schedule would result in a one-year delay in the completion of this series of Technical Memoranda if we can remove the scheduled one-year hiatus that appears between Technical Memoranda 2 and 4 in the NOD schedule. These actions are, of course, dependent on adequate funding in each fiscal year.

This letter is intended to inform EPA Region 6 of the circumstances which have led to the TA-21 OU-1106 RFI schedule and reporting difficulties discussed above. In addition, we seek concurrence on our proposed actions with regard to rescheduling certain activities and splitting Technical Memorandum 1 into two parts, 1A and 1B. The funding, schedule, and NESHAP compliance issues addressed above have been discussed informally with EPA Region 6 personnel on several occasions dating from August 1992, and as recently as February 1993. Each of the issues has been previously identified and addressed in each of our quarterly technical progress reports, commencing with the report for the third quarter of FY 1992 issued in August 1993. Unless otherwise directed, we intend to proceed according to the course of action proposed in this letter. We are in the process of preparing a revised schedule incorporating these changes and plan to submit it formally for approval to have it replace the NOD schedule.

One final issue is minor, in that we would like approval to refer to technical memoranda as "phase reports" in future correspondence. Los Alamos

National Laboratory's Environmental Restoration Program has changed the title of these technical reports in all communication with EPA, except for the TA-21 OU. These technical reports are specified as technical memoranda in the EPA-approved work plan for the TA-21 OU-1106, and therefore EPA's approval is needed to officially change the title. The title change does not affect the content of these documents in any way.

Sincerely,

Joseph C. Vozella

Joseph C. Vozella, Acting Chief
Environment, Safety and Health Branch

LESH:6SS-097

Enclosure:
TA-21 OU RFI Work Plan Addendum
Table 3.1-1. (Summary of Technical Reports for the TA-21 OU RFI)

cc w/enclosure:
K. Sisneros, New Mexico Environment Department
1190 St. Francis Drive
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B. Driscoll, RCRA Permits Branch
U. S. EPA, Region 6
1445 Ross Ave, Suite 1200
Dallas, TX 75202-2733
R. Vocke, EM-13, LANL, MS-M992
K. Bitner, ERPO, AL

cc w/o enclosure:
B. Garcia, Bureau Chief
Hazardous & Radioactive Materials Bureau
New Mexico Environment Dept.
525 Camino de los Marquez
Santa Fe, NM 87502
S. Slaten, ES&H, LAAO
A. Tiedman, ADO, LANL, MS-A120
J. Shipley, EE-AETO, LANL, MS-F641
L. Soholt, EM-13, LANL, MS-M992
K. Hargis, EM-8, LANL, MS-K490
G. Eller, INC-9, LANL, MS-J534
C. Hack, LC-GL, LANL, MS-A187
T. Glatzmaier, EES-5/EM-13, LANL, MS-M992
EM-13 File, (EM-13-93-301), LANL, MS-M992