

MEMORANDUM

~~CONFIDENTIAL~~ 9/9/99

TO: Ron Kern, Technical Compliance Program Manager
Barbara Hoditschek, Permits Program Manager

FROM: ^{bus} Bruce Swanton, Program Manager
DOE EM Oversight Program
LANL AIP P.O.C.

DATE: August 31, 1994

SUBJECT: LANL Installation Work Plan

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During her August 15-19 site visit, Barbara Driscoll of Region 6 EPA requested input regarding what sections of the current Installation Work Plan (IWP) should be kept in the next revision.

HSWA Permit, Task II.E:

The LANL Installation RI/FS Workplan shall contain a Project Management Plan which will include a discussion of the technical approach, schedules, budget, and key projects. The Project Management Plan shall include a description of qualifications of key project [sic] performing or directing the RFI, including contractor personnel. This plan shall also document the overall management approach to the RCRA Facility Investigation.

Following are my recommendations.

1. Keep all sections in volume one.
2. Roll Appendix A , 'Descriptions of technical areas", into Chapter 2, "Installation description".
3. Chapter 3, "Description of the Environmental Restoration Program", is now superseded by the Action Plan. I interpret the permit language to require that the Action Plan be a part of the IWP and replace Chapter 3. Perhaps a subset of the Action Plan would suffice.
4. Chapter 4, "Technical Approach" may also now be superseded by the Action Plan.
5. The proposed Chapter 5, "Framework Studies", should be dropped from the IWP and



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become an independent working document designed to support the site-wide studies done under Task III of the HSWA Permit.

6. Annex 1, "Program Management Plan" is not a Task II requirement and could be dropped.
7. Annex 2, "...Quality Assurance...", could be subsumed under technical approach and so be left in.
8. Annex 3 is "Health and Safety...". This section is not required to be in the IWP, but it should be left in as an important part of the overall management of the ER program.
9. Annex 4, "Records Management", is not required by the permit, but may be retained.
10. The same for Annex 5, "Public Involvement."
11. Appendix B, "Maps of wetlands, drainages, and well locations," is a living document and should be in the Task III Framework Studies document, not in the IWP.
12. Appendix C, "Cover and stabilization studies," should be dropped. This is a stand-alone report.
13. Appendix D, "Geochemical Studies...". Same.
14. Appendix E, "Quality Council Charter." No opinion.
15. Appendix H, "Statistical Sampling...". If EPA/NMED/DOE come to agreement on a set of acceptable statistical techniques, this section would be important. As it stands it is only a compendium of techniques and does not belong in the IWP.
16. Regarding Appendix I, "Decision strategies...", the decision logic which resulted from the Assumptions Task Force meetings and which is still supported by EPA should be in this section.
17. Appendix J, "Screening assessment technology," should be left in, as should Appendices K and L ("Human health risk..." and "Ecological risk...").
18. Appendices M, N and O deal with standard operating procedures, personnel qualifications and cost/schedules and should be left in.