

memorandum

Los Alamos Area Office
Albuquerque Operations Office
Los Alamos, New Mexico 87544

DATE: JUL 21 1994

REPLY TO LESH:TJT:WorkPlan:1.4.2.6.1

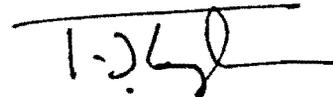
ATTN OF:

SUBJECT: EPA Comments on Work Plans

TO: H. Jansen, Program Manager, UC-LANL, EM/ER, MS M992

Attached are comments which were provided informally by Ms. Barbara Driscoll of the U.S. Environmental Protection Agency (EPA) for the Work Plans for Operable Units (OU) 1093, 1130, 1132, and 1157. Ms. Driscoll indicated that, subject to being provided with detailed schedules for the field work for these OUs, EPA would approve the Work Plans subject to modifications as indicated in the comments. Please ask your staff to review the comments, and notify me if you will be unable to comply with them.

Please call me at 665-7203 if you have questions or concerns.



Theodore J. Taylor
Program Manager
Environmental Restoration Program

Attachment

cc w/attachment:

T. Taylor, ESH, LAAO
R. Enz, LAAO/Scientech
M. Gilgosch, LAAO/Scientech
K. Boardman, ERPO, AL, MS A906
J. Levings, ERPO, AL, MS A906
K. Hargis, ESH-8, UC-LANL, MS K490
RPF, MS M707

cc w/o attachment:

J. Vozella, ESH, LAAO
W. Spurgeon, EM-452, HQ
T. Baca, EM-DO, UC-LANL, MS J591
B. Driscoll, EPA, Region 6



List of Modifications
Operable Unit 1157

DRAFT

1. EPA made several general comments (1 and 3) which were intended to improve the quality of the work plans we received. The structure of this and several other work plans is very difficult to follow which increases EPA review time, and ensures multiple deficiencies to be made. In particular the discussion of the information which should be provided concerning a description of the piping is a good example of how information should be presented. Unfortunately, as usual the lab chooses to ignore the remarks. EPA makes these comments with the hope of improving the workplans, and obtaining the type of information that we need to evaluate sampling plans.

In order to evaluate the potential volume of a release it is important to know the amount of waste transported through a pipeline. The material composition, age of piping, and piping connections are all important pieces of information to anyone evaluating a system. This type of information: age of unit, volume of waste, makeup of the unit should be standard information.

This comment may not be made in the actual work plan approval letter; however, it is important for the lab to understand our position in order to improve the deliverables.

* Ted please note: The format for the schedule presented in Attachment 1 is very good.

1. General comment #4 states EPA's position on any RFI investigation. LANL shall note that if contamination is found above background, then LANL must find the full extent of contamination and must demonstrate that there is a "clean zone" beneath the contamination. LANL shall revise their overall strategy accordingly. This comment also applies to LANL's response to Specific Comments 1(b), 5(a), 5(g), 6(e), 12(b), 13(e), 15, 16(b), 17(c), 18(d), 20(b), 21, 23(b), 24(b), 25(c), 27(c), and 28(c).

2. When is the revised work plan being submitted?

3. LANL has still not provided the information requested in these comments 5(e) and 6(a). LANL shall provide the list of all hazardous constituents that make up or are included in photo-processing wastes.

4. No responses have been received for deficiency #7. LANL shall provide a response.