



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

OCT 03 1994

OFFICE OF THE



Beato
Teri P.
Per Barbara
Lon K PAK
Bruce
Is the response adequate?
Pls let me know
file Beato

William K. Honker, Chief
 RCRA Permits Branch
 U. S. Environmental Protection Agency
 Region 6
 1445 Ross Ave., Suite 1200
 Dallas, TX 75202-2733

Dear Mr. Honker:

Enclosed is the response to your Notice of Deficiency for Operable Unit 1085.

If any questions arise, please call me at (505) 665-7203.

Sincerely,

T. J. Taylor

Theodore J. Taylor
 Program Manager
 Environmental Restoration Program

LAAMEP:7TT-050

Enclosure

cc w/enclosure:

- K. Sisneros
 Water and Waste Management Div.
 New Mexico Environment Dept.
 1190 St. Francis Drive
 Santa Fe, NM 87502
- E. Merrill, EM-452, HQ
- T. Taylor, AAMEP, LAAO
- B. Enz, Scientech, LAAO
- B. Swanton, NMED, AIP, LANL,
 MS-J993
- J. Levings, ERPO, AL

cc w/o enclosure:

- W. Spurgeon, EM-452, HQ
- K. Schenck, Scientech, LAAO
- D. Garvey, ESH-8, LANL, MS-K490
- T. Baca, EM, LANL, MS-J591
- J. Jansen, EM/ER, LANL, MS-M992
- RPF, LANL, MS-M707

HswA LANL Fu-2/1085

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**List of Deficiencies
Los Alamos National Laboratory
Operable Unit 1085**

General Comments:

1. For sampling conducted at all SWMUs, potential contaminants of concern which are found to be above background may require further delineation of the extent of contamination. No response needed.
2. Data quality objectives should be concise and to the point. The primary purpose of this work plan should be to describe the units required for investigation and the sampling plans for those units. The format used (DQOs followed by sampling plans) is very repetitious, and as a result is also confusing. In addition, information presented in the DQOs may conflict with information presented in the sampling plans (see deficiency #12). No response needed.
3. LANL may request a Class III permit modification for removal of SWMU 12-002 from the HSWA permit. The following units do not need to be added to the permit:

C-12-006
12-003
14-008

Response: LANL will prepare a permit modification request to remove SWMU 12-002 from the HSWA portion of the RCRA permit, and will not add the units C-12-006, 12-003, and 14-008 to the HSWA portion.

Specific Comments:

1. Section 5.1 - A more detailed VCA plan should be submitted separately for unit 12-001(b) to EPA for approval as this will be considered the final remedy for this unit. Will removing the visible HE from the surface be sufficient to address the actual pit where HE was detonated? EPA is concerned that there may be residual HE in the pit. Is the VCA to be based on the five samples to be collected (p. 5-1-12 bottom)? Text is not clear on the use of the five samples.

Response: LANL agrees that removing the visible HE from the surface may not be sufficient for a VCA of PRS 12-001(b). The visible HE is required to be removed as part of the initial site survey by DX-16 (Explosives Development Group) personnel as a safety precaution. Since both sites [12-001(a) inside the pit] are known to have both HE and uranium contamination, LANL thus proposes to characterize both 12-001(a) and 12-001(b) for a baseline risk assessment by collecting samples from randomized locations. This baseline risk assessment will be conducted after removal of surface HE by explosive safety personnel during a field HE survey. In the baseline risk assessment, two samples each will be collected within the centers of each of the firing pits and from a polar sampling grid centered on each pit. The 150 ft. sampling radii of the two SWMUs overlap in the area between the sites; thus sampling will be collected within three regions of the polar grids: 1)

The area unique to 12-001(a); 2) The area unique to 12-001(b); and 3) The area common to both (see revised Figure 5-2, attached).

A total of 11 samples will be collected from the areas immediately surrounding the firing sites. Three samples will be collected within the area common to both grids, and the unique portion of the grids will be sampled at eight random points: two samples at each of the 50 ft distances, and one sample at each of the 100 ft and 150 ft distances. Upon completion of the baseline risk assessment sampling, LANL will determine the need for a VCA and submit such plans, if a VCA is required, according to EPA and NMED policy.

2. Section 5.1.3.1, p. 5-1-7 - Is there any visible staining from the fuel use at area of concern C-12-004?

Response: There is no visible staining or other evidence of an oil spill under the barrel racks associated with AOC C-12-004.

3. Section 5.1.5.2 Boundaries, p. 5-1-11 - Text indicates that the drainage path for this unit, C-12-003, will be sampled; however, a description of this event is not included in the sampling plans for C-12-003 (p. 5-1-15). LANL shall provide information related to sampling the drainage path.

Response: The text on p. 5-1-15 should be corrected as follows (§ 3, C-12-003):

“• Five feet downslope in the drainage path from the center of the magazine floor (Figure 5-3)”

4. Section 5.1.6 Phase I Sampling and Analysis Plan, p. 5-1-13 - There is no description of the grid proposed in the field screening section. This information along with a figure showing the grid should also be provided. In addition, how can you determine what two times background is until background sampling has been conducted for this area. Locations of background samples should be included in the figures.

Response: The grids for 12-001(a) and 12-001(b) are polar grids, extending 150 feet from the center of the firing pits at 50 foot intervals, with intersecting radial lines at due North and 22.5° intervals (see revised Figure 5-2) around the circumference. Random samples will be taken at eleven locations on the two grids, with three samples taken in the area where the two grids overlap, and four points each in the areas where the two grids do not. Background levels in the area will be determined from 140 soil samples that have been taken on Threemile and Pajarito mesas as part of the LANL framework studies. The attached figure (located immediately after the map and sampling and analysis plan for Aggregate 1) indicates the locations of background samples relative to SWMU 12-001(a). Analytical data on these samples is expected to be returned in FY95.

5. Section 5.1.6.3 Sampling Summaries, p. 5-1-14 -

- a. Deeper samples should be collected from the interior of the open firing site (12-001(b)). At the two biased surface sample locations, a sample should be collected at 6 inches and a deeper sample should be collected at the 18 inch to 24 inch interval. Laboratory analysis should be conducted for high explosives (HE), HE byproducts and metals for all four samples.**

Response: LANL will take additional samples at the 18–24” interval for the two biased samples in the open firing pit. Lab analyses will include HEs and HE degradation products, RCRA metals, and U. See revised Table 5-4 (attached).

- b. Is the interior of 12-001(a) lined or is it dirt? Biased rather than randomly located soil samples (based on field screening) should be collected from the interior of the pit.**

Response: The interior of the pit—including the floor—is steel-lined; the floor is, in addition, covered with a small amount (less than two inches) of sandy soil. We propose to take random samples here because the soil has been homogeneously mixed by explosive events of the past, or has otherwise been deposited after the site was inactivated; prior screening of the soil did not indicate the presence of HEs or radioactivity.

6. 5.2.2 Description and History, p. 5.2-2.

- a. These units are listed as SWMUs however, they are currently not included in the HSWA portion of the RCRA permit for investigation. Should sampling indicate HE contamination, then these units will need to be added to the permit.**

Response: If HEs or RCRA metal contamination exceeding regulatory limits are found, these PRSs will be added to the HSWA portion of the RCRA permit for LANL.

- b. Text in the last paragraph of this section and in the first paragraph of Section 5.2.4.1 both refer to HE occurring at this site. What type of tests were conducted in 1959 to determine that HE was present? The activities described do not appear to include any explosives, so what is the potential source of the HE? Is there possibly another source for the HE rather than the experiments conducted here.**

Response: LANL policy at the time (1959) was to list sites with potential HE contamination as being HE-contaminated unless it was conclusively proved (through archival and presumably spot testing) that HEs were not used at the site. There is no indication—either through archival or interviews—that HE testing was ever conducted at the site. Due to the absence of confirmatory data regarding the presence of HE at 12-004(a,b), we will conduct HE screening on all samples taken at this aggregate.

- 7. Section 5.2.5.4 Design criteria (DQO Step 6), p. 5.2-7 - Regardless of the statistical sampling approach used, LANL shall send any samples for laboratory analysis which have a positive indication on the HE spot test kit.**

Response: LANL agrees that any samples which have a positive HE spot test result will be sent out for fixed laboratory analysis. Because of the variability of response of the test

kit with the types of soils and HEs involved (typically Comp B or C-4), it is likely that a consistent positive result will occur at $\geq 500\text{--}1000$ ppm..

8. **SWMU 14-010, p. 5.3-5 - Was there a drain field associated with this SWMU? Investigatory sampling should be conducted at any outfall from the sump in the drain field.**

Response: According to engineering drawings done at installation of the HE drain in Q-2 (drwg. no. ENG-C-21905, dated 4/60), the drain passed under the then-existing road southeast of Q-2 and daylighted downgrade approximately 24 feet SE—and approximately five feet below the level of the site—from the former structure. The sump, drainline, and building were removed in the 1970s when the present bullet test facility (buildings/structures 14-34, 14-39, 14-40, 14-43, and 14-44) was built. At that time, the asphalt pad south of the former Q-2 structure was enlarged to house a 30 mm gun facility. Using aerial photographs and engineering drawings, with the front of the magazine (14-30) as a benchmark, it appears as if the asphalt on the site was enlarged by approximately 20–30', which would effectively cover the former outfall under 5–10' of dirt and asphalt. If possible, LANL will sample the soil at the most likely location—based on the engineering data—where potential contaminants from this drain could migrate from under the soil/asphalt pad (see revised Figure 5-7 and Table 5-9)). Field screening will be done for radionuclides and HE, and fixed lab analyses for U, RCRA metals, HEs and HE degradation products.

9. **5.3.6.2 Sampling p. 5-3-11 through 5-3-15 -**

- a. **LANL may not defer sampling of the decommissioned sites 14-001(f), 14-002(a-b), 14-009 and 14-010. LANL shall develop sampling plans to address these areas and provide such to EPA within 60 days of receipt of this NOD. Because several of the sites are so closely located, LANL may want to develop a sampling plan to address releases for the area and not for each individual SWMU with the exception of 14-009 and 14-010. These sampling plans should include drawings detailing sampling locations for the units of concern. LANL should provide a blow-up of the areas to be sampled with building outlines and sampling locations marked. Sampling should also address the sandbags.**

Response: LANL will submit sampling plans for SWMUs 14-001(f), 14-002(a-b), 14-009, and 14-010 by 1 November, 1994. Since these sites have been inactivated since the work plan was submitted, ongoing operations which generate contaminants would not compromise sampling.

- b. **LANL needs to provide more information concerning the selection of sampling locations for the eight surface samples. A detailed drawing of the drainage paths would be helpful.**

Response: Releases from the site along the drainage channels are addressed in the sampling plan (section 5.3.6.2.3; see revised Figure 5-7). Samples in the drainage channels will be taken at approximately 50, 100, 150, and 200 ft downgradient from the mesa top, and biased towards sediment catchments where higher concentrations of contaminants are likely to be found.

10. **SWMU 14-006, p. 5.4-3 - LANL shall sample the outfall area of this SWMU. Samples should be collected at 6 inches and 18 - 24 inches in depth next to the outfall (even into the tuff). LANL shall provide a figure which indicates the sampling locations and the unit in more detail. Has the sump been or can it be examined for leakage?**

Response: LANL will sample the outfall area of the sump, including surface (0–6”) and subsurface (18–24”) soil samples at the site of the outfall and at 25’ downgradient (0–6” depth) in the drainage channel (see revised Figure 5-8). The sump consists of a welded aluminum tank—constructed of 1/4” thick plate—grouted into an existing concrete sump (engineering drwg. ENG-C-30415); the sump may be visually examined from ground level by opening a hatch at the surface. LANL will physically examine the sump for leaks and sample adjacent to the sump with a shallow borehole (5–8’) to analyze for HEs, metals, and uranium.

11. **5.5.6.3 Sampling Summary, p. 5-5-8 - A deeper sample should be collected immediately below the outfall at 18 - 24 inches and analyzed as the other samples.**

Response: LANL will sample immediately below the outfall at 18–24” depth, and analyzed for HEs and HE degradation products, metals, U, cyanides, and semivolatiles (see attached revised Figure 5-11 and Table 5-14).

12. **Text concerning SWMUs 14-002(d) and 14-002(e) is conflicting in sections 5.6.5.4.1 and 5.6.5.4.2 (p. 5-6-10). The first section indicates using six sampling points for the firing site obtained by the nomogram approach to provide an 80% chance of detecting contamination if 25% of the site is contaminated. The second section indicates that the nomogram approach indicates two samples for each PRS would provide a 75% detection probability if 50% of each PRS was contaminated. Six samples should be collected for these two units combined.**

Response: The paragraphs refer to different situations: in §5.6.5.4.1, the nomogram approach is discussed with reference to contamination of the entire firing site, including 14-002(c,d,e). Regarding §5.6.5.4.2, application of the nomogram approach is to the two firing pads. LANL will take two samples at each firing pad, as well as four samples in the drainage channel to assess offsite migration.

13. **5.6.6.2.3 Sampling Summaries, p. 5.6-12 -**

- a. **SWMU 14-002(C) - It is unclear why LANL believes that contamination has escaped from this bunker. It is more likely that contamination found outside the bunker is a result of activities at SWMUs 14-002(d and e).**

Response: There is no evidence to suggest that contamination has escaped the interior of the bunker, 14-002(c). Contamination on the bunker exterior would most likely arise from explosive events at 14-002(d,e); however such contamination would probably be small given that concrete slabs were placed between the firing pads and the bunker to deflect the blast. We propose to alter the sampling plan for 14-002(c) and limit the sampling to two interior soil samples (field-screened for HEs and U, and analyzed for RCRA metals, U, HEs, and HE degradation products). Revised Figure 5-13 and Table 5-17 (attached) indicate the modified sampling for 14-002(c).

- b. **East Site Drainage Sampling, p. 5.6-15 - The four sampling locations are not indicated on any figure in this section. LANL shall provide a figure showing the location of the drainage and the sampling locations.**

Response: Revised figure 5-13 (attached) show the drainages and sampling locations for SWMUs 14-002 (c,d,e).

14. **6.1.1 Satellite storage Area, SWMU 14-004(b), p. 6-1 - LANL should provide the background information concerning this unit. How long has the storage area been used? What is stored in this area and what type of storage is provided? Has a visible inspection of this area been conducted recently? Can LANL provide documentation that for the entire time this unit was used that spills have been cleaned up? EPA cannot evaluate the request with the limited amount of information provided. This also applies to satellite storage areas 14-004(a,c).**

Response: Although the SWMU report indicates SWMU 14-004(b) contains a 40' square concrete pad holding 20-30 55 gallon drums and was used for storage of product fuel oil, as well as material contaminated with scrap HE (paper and small noncombustible items). Discussions with site personnel indicate that it is unlikely that fuel oil would be stored at this site, but rather in a solvent storage cabinet or in a drum storage area. According to engineering drawings and visual inspection, there is no 40' square concrete pad in building 14-23 (nor anywhere else on site for drum storage), as was asserted in the SWMU report. The building itself is probably no more than 25' square, with a flat overhanging roof and a small (less than 5 drums) drum storage area on the west side of the building. This SWMU is still active as an approved accumulation area and is inspected annually (last inspection was 9/94) by NMED personnel. We propose to retain SWMU 14-004(b) as NFA under criteria 2 of the work plan (the area is an approved accumulation area regulated under 40 CFR 262 "Standards Applicable to Generators of Hazardous Waste.") since the unit is in continuous use in association with firing pad tests. SWMUs 14-004(a,c) were historically used for storage of small quantities of scrap HE, which were removed from the area at frequent intervals. PRS 14-004(a) is an earthen-bermed magazine (structure 14-22) which had been converted to use as a satellite storage area. Both sites are now inactive. Because of HE safety policies, spills of materials from these SWMUs would likely have been cleaned up immediately, and probably not reported. Due to the likely quantity and state of material involved in such a spill (less than 0.5 lb of PBX (plastic bonded explosive) scrap as well as the immediate cleanup policy, contamination would almost certainly be below detection limits. We propose to change the status (from NFA) and sample SWMU 14-004(a) in the soil of the building interior (0-6") for HEs and metals. SWMUs 14-004(c) is proposed for NFA since contamination from this site is identical to and probably not as widespread that from 14-001(g), the active firing site, and will be characterized when the latter SWMU is decommissioned. The following text changes are to be made, and revised sampling and analysis plans are attached (Table 5-12, Figure 5-8).

Page 6-1, Section ~~6-1-1~~ 5.4.2. ...Therefore, these this areas will continue to be regulated under 3004(a) of the RCRA and not 3004(u) of the Hazardous and Solid Waste Amendments.

Page 6-2, Section ~~6/2-25~~ 4.2 ...The NMED also performs annual inspections. The soil inside the bunker (TA-14-22 [14-004(a)]) will be bias sampled at the surface (0-6") following HE screening for HEs and HE degradation products.

**List of Deficiencies
Los Alamos National Laboratory
Operable Unit 1085**

REVISED FIGURES

AND

SAMPLING AND ANALYSIS TABLES

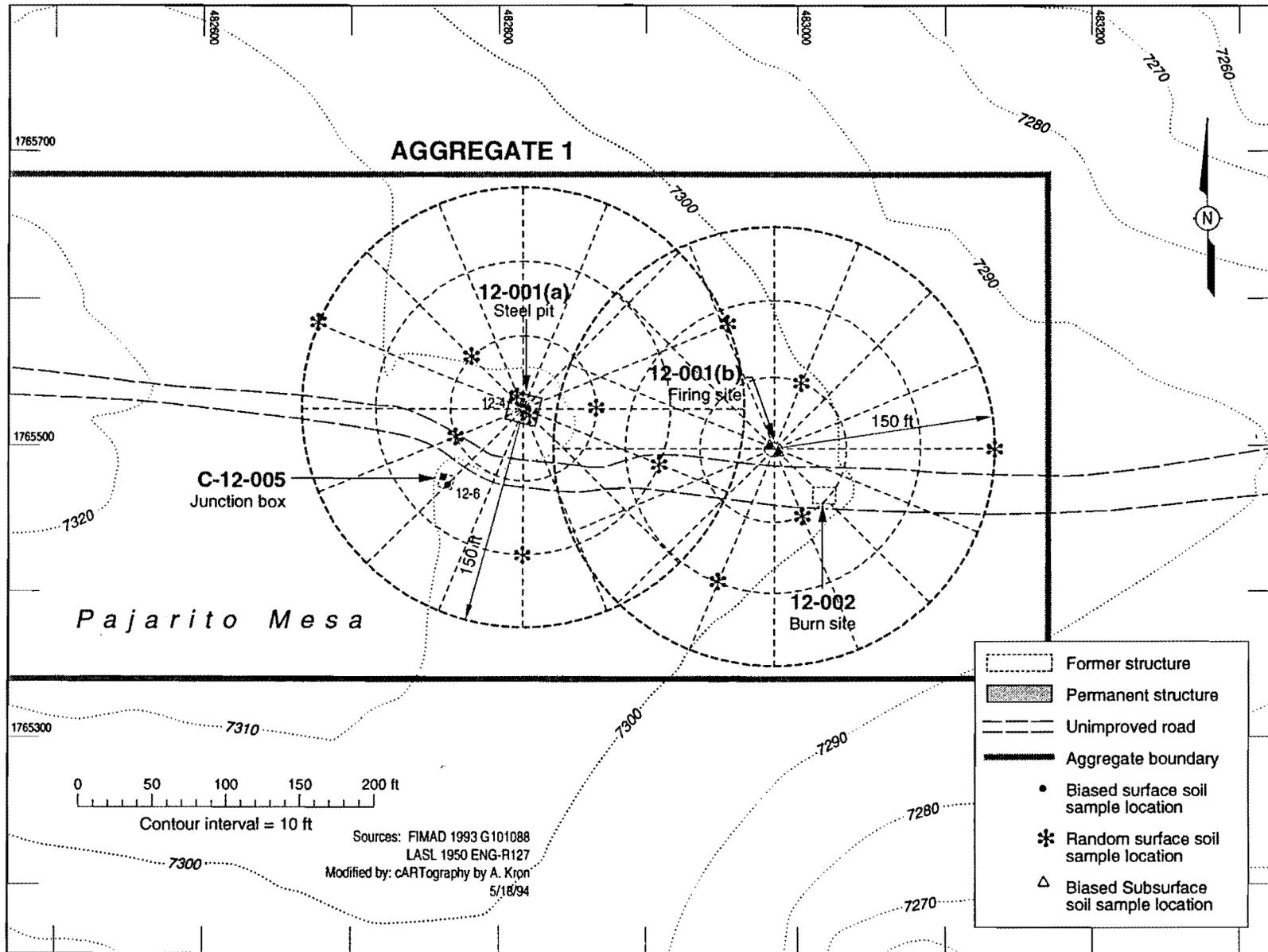
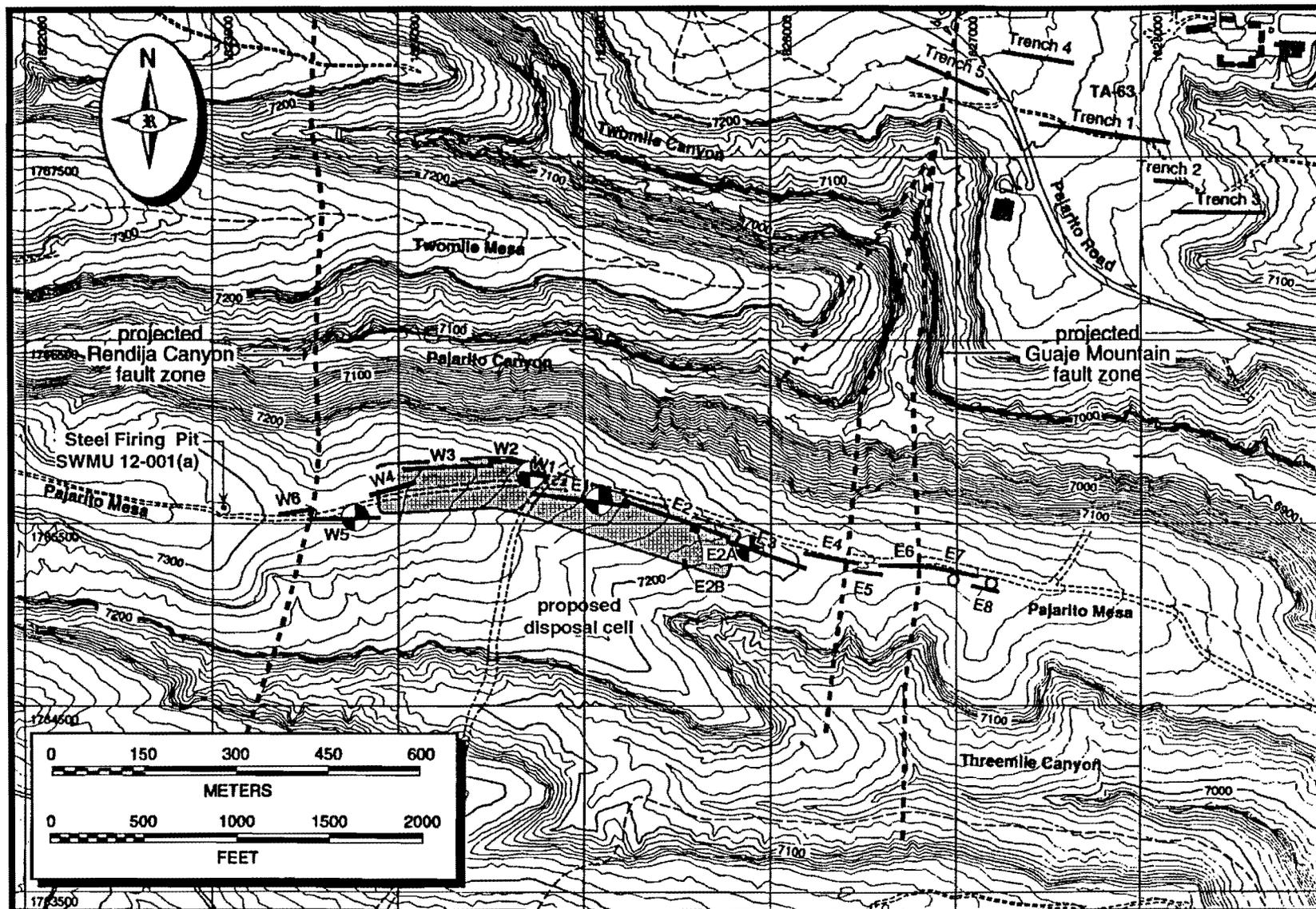


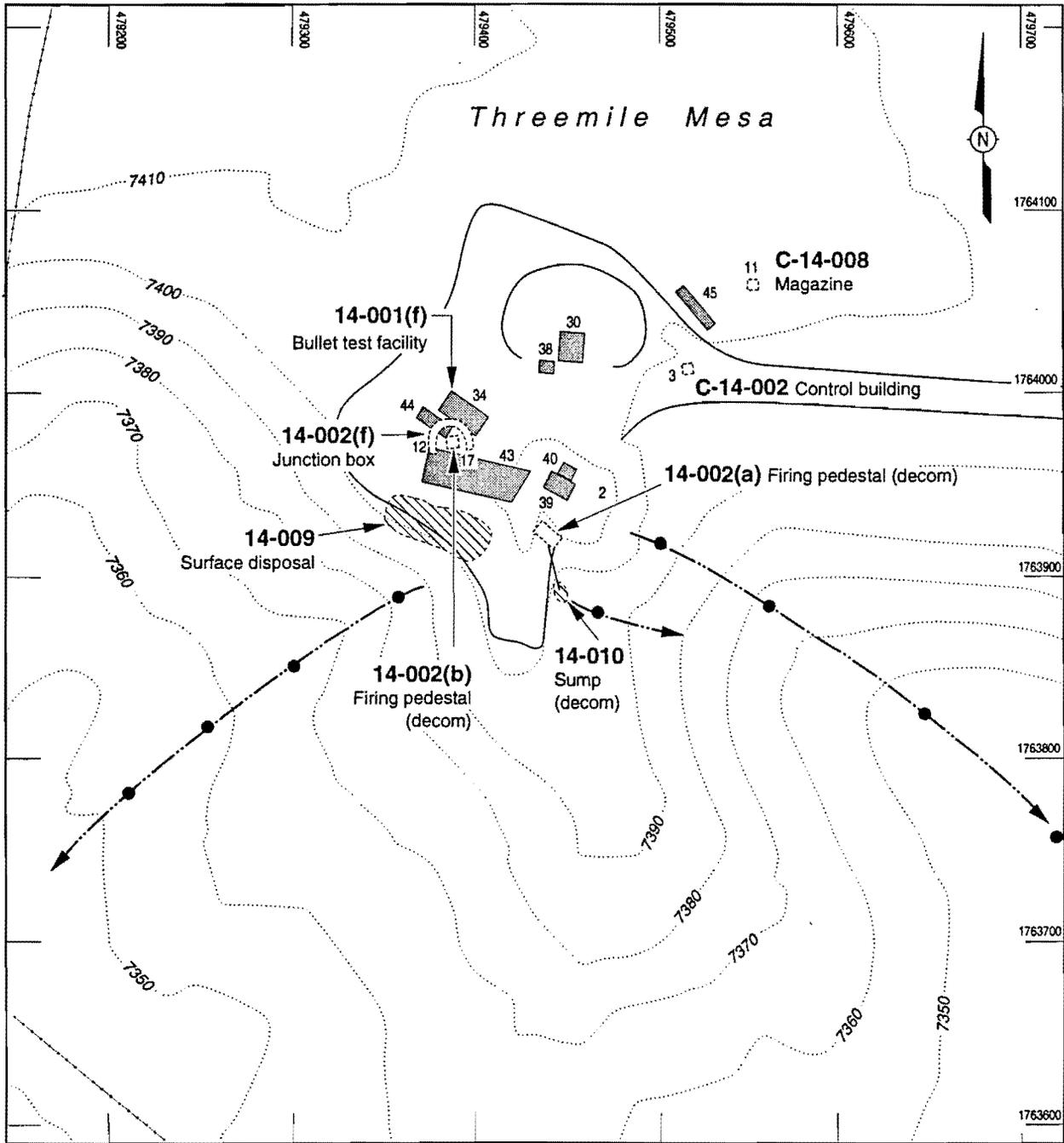
Figure 5-2. Sampling locations in the eastern portion of Aggregate 1—TA-12: Inactive Firing Sites. The steel pit [12-001(a)] and open pit [(12-001(b)] represent the center of the firing sites.

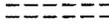
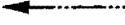
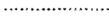
Table 5-4 Summary of OU 1085 Site Surveys, Sampling and Analysis Aggregate 1				Field Survey							Field Screening			Laboratory Analyses				
FRS	PRS Type	Phase 1 Approach	Sample Media	Samples	Duplicates	Land Survey	Geophysics	High Explosives	Polynuclear Aromatic Hydrocarbons	Radiation	Gross Beta/Gamma	High Explosives	Organic Vapor	Gamma Spectroscopy	High Explosives	Isotopic Uranium	Metals	Semi-volatiles
12-001(a)	Steel pit, Firing Site	Risk Assessment Characterization	Soil in pit	2				X		X	X	X		X	X	X	X	
12-001(a)	Steel pit, Firing Site	Risk Assessment Characterization	Soil	5	1	X		X		X	X	X		X	X	X	X	
12-001(b)	Open Firing Pit	Screening Assessment	Soil in pit	2				X		X	X	X		X	X	X	X	
12-001(b)	Open Firing Pit	Screening Assessment	Soil in pit (18-24")	2				X		X	X	X		X	X	X	X	
12-001(b)	Open Firing Pit	Risk Assessment Characterization	Soil	6	1	X		X		X	X	X		X	X	X	X	
C-12-001	Trim Building	Screening Assessment	Soil in building	2				X		X	X	X		X	X	X	X	
C-12-002	Control Chamber	Screening Assessment	Soil	2				X		X	X	X			X	X	X	
C-12-003	Magazine	Screening Assessment	Soil	2				X			X	X			X		X	
C-12-004	Generator Building	Screening Assessment	Soil	2					X		X	X	X					X
C-12-005	Junction Box	Screening Assessment	Soil	2				X		X	X	X			X	X	X	



Map of TA-67 (Pajarito Mesa) showing the location of the proposed Mixed-Waste Disposal Facility and locations of geophysical test trenches and background soil samples.

 Background Soil Test Sample Locations



-  Existing building or structure
-  Former building or structure
-  Paved road
-  Unimproved road
-  Fence
-  Direction of drainage
-  10-ft contour line
-  Surface soil sample

Sources: FIMAD 1993 G100991
 LANL 1988, ENG-C45511
 Modified by: cARTography by A. Kron 9/12/94

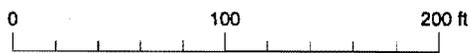


Figure 5-7. Sampling locations in Aggregate 3—TA-14: Western Area.

Table 5-9 Summary of OU 1085 Site Surveys, Sampling and Analysis Aggregate 3						Field Survey		Field Screening		Laboratory Analyses								
FRS	PRS Type	Phase 1 Approach	Sample Media	Samples	Duplicates	Land Survey	Geophysics	High Explosives	Polynuclear Aromatic Hydrocarbons	Radiation	Gross Beta/Gamma	High Explosives	Organic Vapor	Gamma Spectroscopy	High Explosives	Isotopic Uranium	Metals	Semivolatiles
Aggregate 3	Offsite Migration	Screening Assessment	Soil	8	1	X		X		X	X	X		X	X	X	X	X
14-010	Sump	Bias	Soil at outfall	1				X		X	X	X		X	X	X	X	X

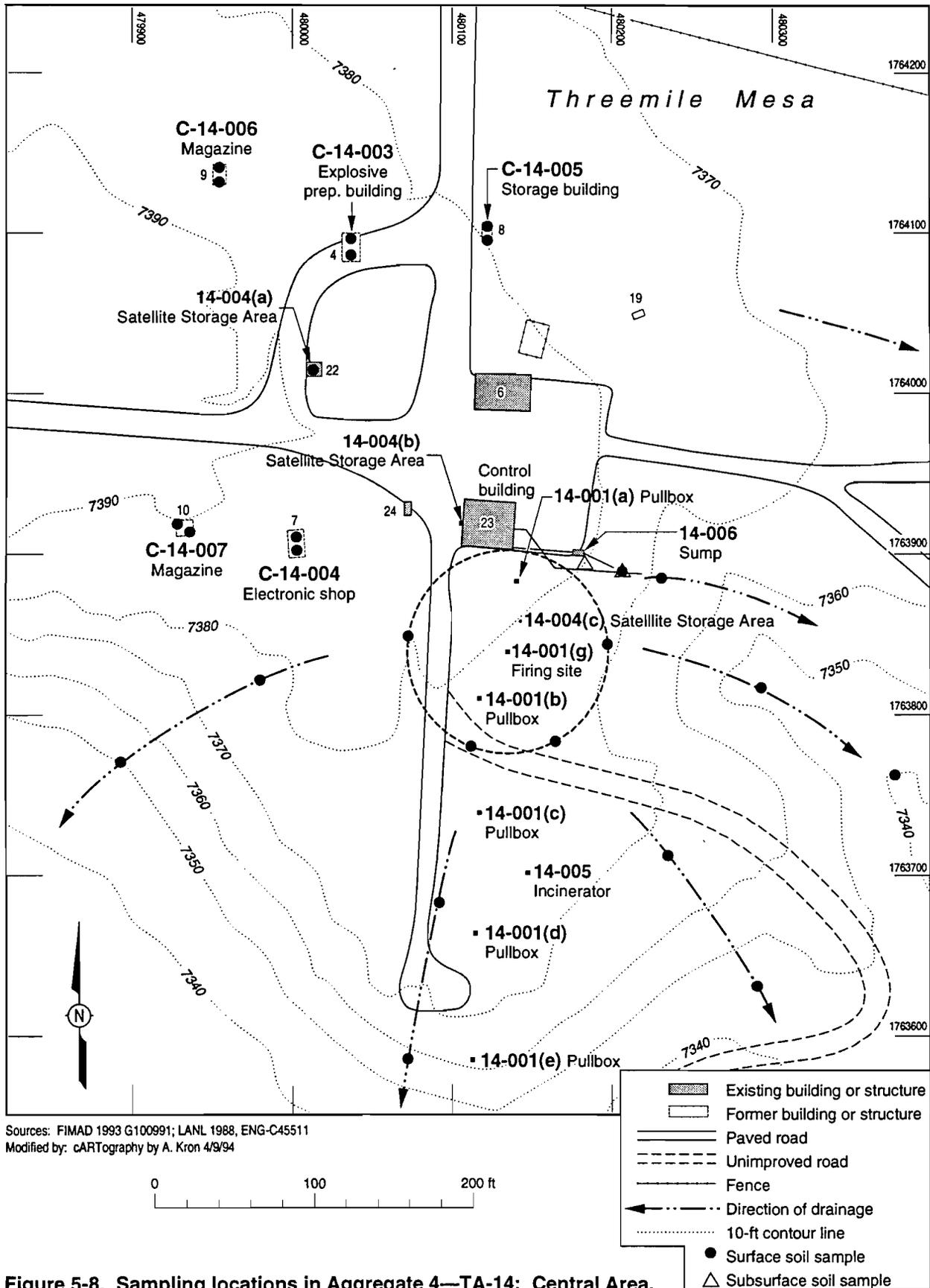
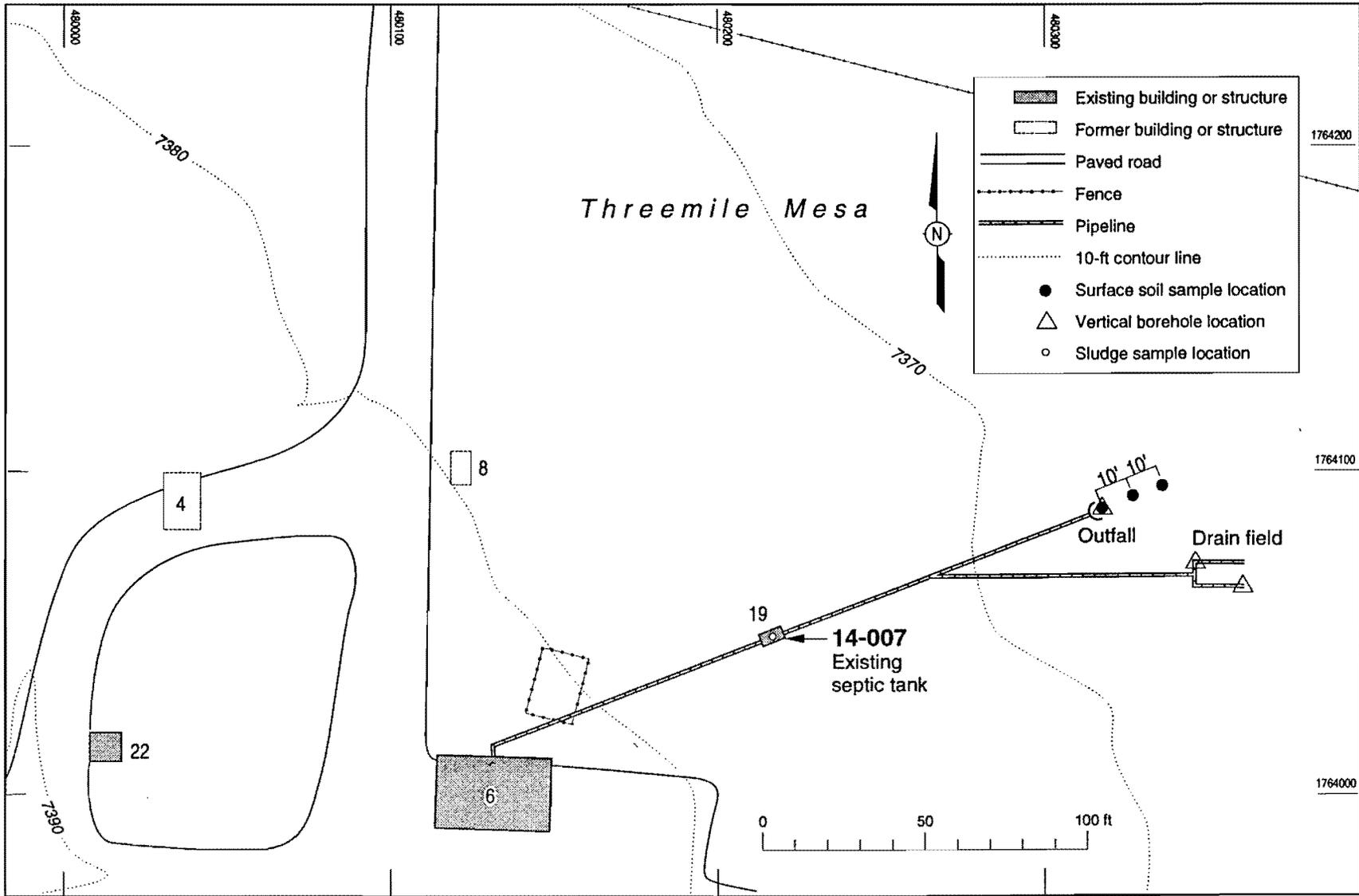


Figure 5-8. Sampling locations in Aggregate 4—TA-14: Central Area.

Table 5-12 Summary of OU 1085 Site Surveys, Sampling and Analysis Aggregate 4				Field Survey				Field Screening		Laboratory Analyses										
PRS	Prs Type	Phase 1 Approach	Sample Media	Samples	Duplicates	Land Survey	Geophysics	High Explosives	Polynuclear Aromatic Hydrocarbons	Radiation	Gross Beta/Gamma	High Explosives	Organic Vapor	Gamma Spectroscopy	PAHs	High Explosives	Isotopic Uranium	Metals	Polychlorinated Biphenyls	Semivolatiles
Aggregate 4	Aggregate Screening	Screening Assessment	Soil	12	1	X		X			X	X		X		X	X	X		
14-004(a)	Satellite Storage Area	Screening Assessment	Soil	1				X	X	X	X	X		X		X	X	X		X
14-006	Sump outfall	Screening Assessment	Soil	2				X	X	X	X	X	X	X		X	X	X		X
14-006	Sump outfall	Screening Assessment	Soil (18-24")	1				X	X	X	X	X	X	X		X	X	X		X
14-006	Sump	Screening Assessment	Soil (3-5')	1				X	X	X	X	X	X	X		X	X	X		X
C-14-003	Explosives Prep. Bldg.	Screening Assessment	Soil	2						X	X	X		X		X	X	X		
C-14-004	Electronics Shop	Screening Assessment	Soil	2																X
C-14-005	Storage Building	Screening Assessment	Soil	2				X	X	X						X	X	X		
C-14-006	Magazine	Screening Assessment	Soil	2				X		X	X					X	X			
C-14-007	Storage Building	Screening Assessment	Soil	2				X	X	X	X					X	X	X		X



Sources: FIMAD 1993 G100991; LANL 1988, ENG-C45511
Modified by: cARTography by A. Kron 5/18/94

Figure 5-11. Sampling locations in Aggregate 5—TA-14: Septic Tank.

Table 5-14 Sampling and Analysis Summary for Aggregate 5				Samples	Duplicates	Field Survey			Field Screening		Laboratory Analyses							
FFS	Prs Type	Phase 1 Approach	Sample Media			Land Survey	Geophysics	High Explosives	Polynuclear Aromatic Hydrocarbons	Radiation	Gross Beta/Gamma	High Explosives	Organic Vapor	Gamma Spectroscopy	Cyanide	High Explosives	Isotopic Uranium	Metals
14-007	Septic Tank	Screening Assessment	Sludge	1	1	X			X	X	X	X	X	X	X		X	X
14-007	Septic Outfall	Screening Assessment	Soil	3		X	X	X	X			X	X	X	X		X	X
14-007	Septic Outfall	Screening Assessment	Soil (18-24")	1			X	X	X			X	X	X	X		X	X
14-007	Septic Drainfield	Screening Assessment	Soil	2		X	X	X	X		X	X	X	X	X		X	X

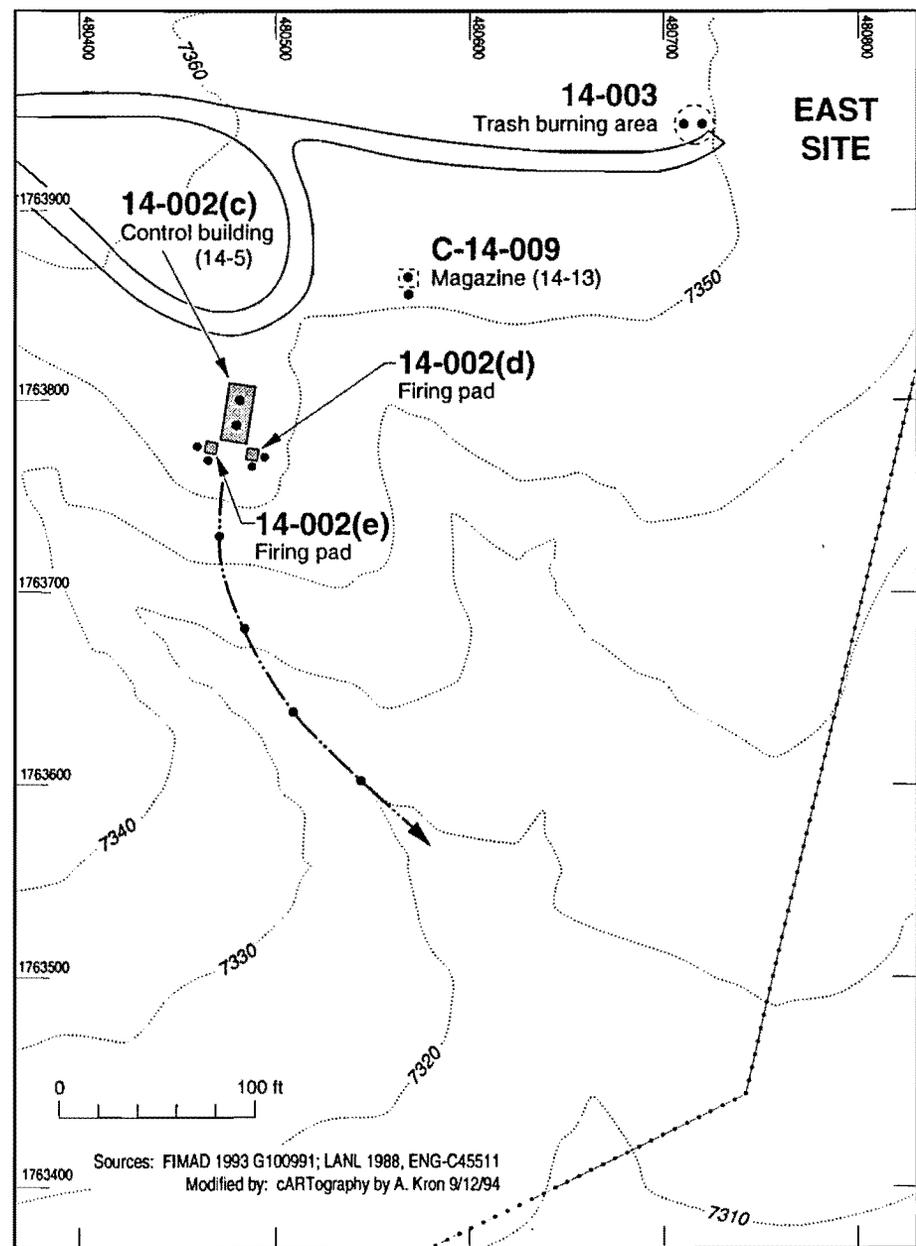
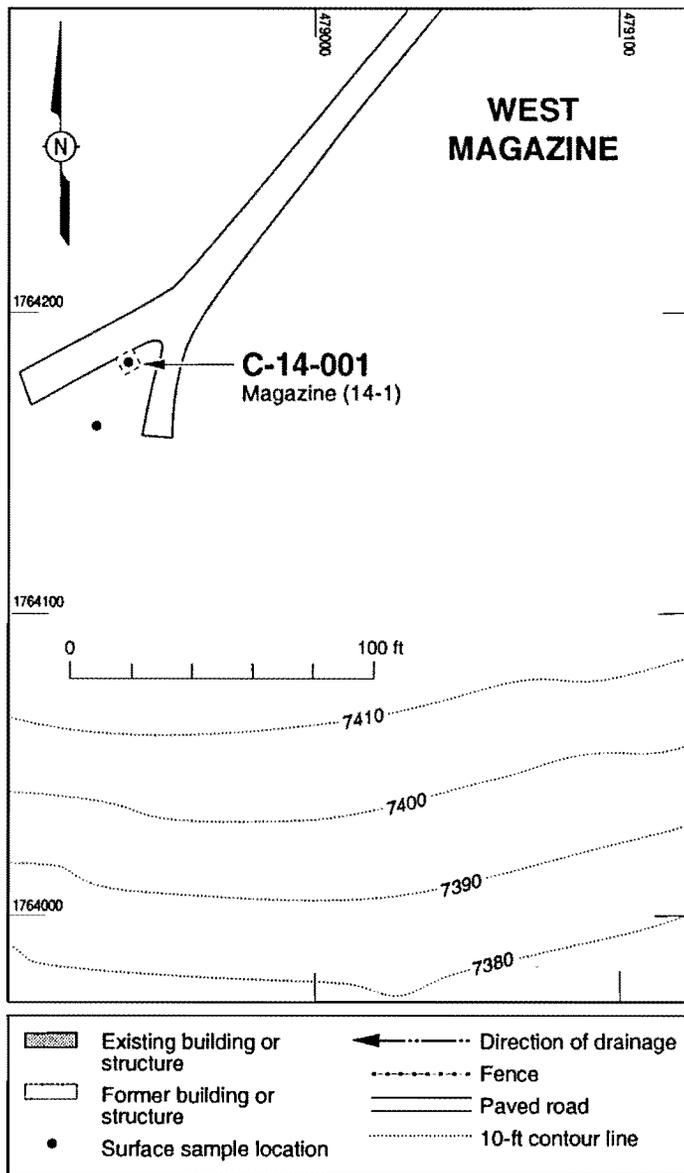


Figure 5-13. Sampling locations for Aggregate 6—TA-14: East Site and West Magazine.

Table 5-17 Summary of OU 1085 Site Surveys, Sampling and Analysis Aggregate 6				Field Survey							Field Screening			Laboratory Analyses				
FFS	Prs Type	Phase 1 Approach	Sample Media	Samples	Duplicates	Land Survey	Geophysics	High Explosives	Polynuclear Aromatic Hydrocarbons	Radiation	Gross Beta/Gamma	High Explosives	Organic Vapor	Gamma Spectroscopy	High Explosives	Isotopic Uranium	Metals	Semivolatiles
14-002(c)	Control Building	Screening Assessment	Soil in building	2				X		X	X	X		X	X	X	X	
12-002(d,e)	Firing pads	Screening Assessment	Soil	4	1	X		X		X	X	X		X	X	X	X	
14-003	Trash burning area	Screening Assessment	Soil	2		X		X		X	X	X	X	X	X	X	X	X
C-14-001	Magazine	Screening Assessment	Soil	2	1	X		X		X	X				X		X	
C-14-009	Magazine	Screening Assessment	Soil	2		X		X		X	X				X		X	
Aggregate 6	Offsite Migration	Screening Assessment	Soil in drainage channels	4		X		X		X	X			X	X	X	X	

CERTIFICATION

I certify under penalty of law that these documents and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violation.

Document Title:

Response to NOD for RFI Work Plan for OU 1085

Name:  Date: Sept. 30, 1994
Dennis Erickson
Division Director
Los Alamos National Laboratory

Name:  Date: 10/3/94
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