

# memorandum

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

DATE:

REPLY TO: LESH:TJT:1082/MDA-P:1.4.2.6.1.7.2.3  
ATTN OF:  
SUBJECT: MDA-P Closure Plan NOD Response

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

At the July 25, 1994 meeting with the New Mexico Environment Department (NMED), which was held to discuss the Response to the Notice of Deficiency (NOD) for the Closure and Post-closure Plan for Material Disposal Area (MDA) P, Operable Unit (OU) 1082, several major issues were discussed and remain unresolved. Staff of the University of California did not present clearly the options for sampling and monitoring and for design of the closure, nor did they appear to be well prepared to respond to questions from NMED staff. Attached for your information is a letter I am sending to Ms. Barbara Hoditschek, in which I apologize for the poor performance by the Environmental Restoration (ER) Program staff.

Actions which must be taken immediately are the following:

1. prepare a clear and detailed Sampling and Analysis Plan (SAP) for the vadose zone monitoring; the plan must provide specific information on the purpose and justification for the sampling to be conducted;
2. prepare an SAP for the groundwater monitoring well; the plan must provide specific information on the purpose, justification, and location of the well;
3. prepare a plan for demonstration of the feasibility of the cap design to be proposed to NMED; the plan must provide specific information regarding the schedule for the demonstration, must compare features of the proposed cap with a standard cap that is generally used for closures, and must contain a schedule for completing the demonstration and a final design;
4. prepare a cost and schedule for implementing all phases of the monitoring, closure, and post-closure activities;



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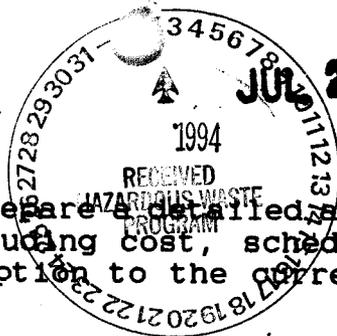
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5. at the request of NMED, prepare a detailed analysis of the "clean closure" option, including cost, schedule, and risk analysis, and compare this option to the currently proposed "closure in place" option.

These items will be submitted to NMED in partial fulfillment of the Response to the NOD, and we have requested a 120-day extension in which to do so.

In addition, please ask your staff to conduct a briefing for LAAO on the status of response to this request at 9:00 a.m. on Wednesday, August 10, 1994, in my office. I am inviting NMED staff to attend this briefing.

Completing the NOD Response in a timely manner is of utmost importance. NMED has cooperated fully with the ER Program in this matter, and on other occasions has provided generous support, advice, and assistance to us. It is very important to me that we interact appropriately with the NMED staff.

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

Theodore J. Taylor  
Program Manager  
Environmental Restoration Program

Attachment

cc w/attachment:

- T. Taylor, ESH, LAAO
- B. Koch, Scientch/LAAO
- K. Boardman, ERPO, AL, MS A906
- J. Levings, ERPO, AL, MS A906
- K. Hargis, ESH-8, UC-LANL, MS K490
- RPF, MS M707
- J. Vozella, ESH, LAAO
- W. Spurgeon, EM-452, HQ
- T. Baca, EM-DO, UC-LANL, MS J591
- B. Hoditschek, NMED

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