4/6/93

DRAFT

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

Dear Mr. Honker:

RE: SCOPE/SCHEDULE CHANGES TO TECHNICAL REPORTS ON ACTIVITY DATA SHEET (ADS) 1106

The Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Work Plan for the Technical Area (TA)-21 Operable Unit (ADS 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 addressing both the sequence of TA-21 field investigations, and the content and timing of technical reports to EPA. The attachment to this letter is an excerpt from the work plan addendum which shows the scheduled dates and contents of the technical reports (quarterly reports and Technical Memoranda).

As detailed below, circumstances subsequent to the NOD response have caused the TA-21 RFI schedule to slip significantly. The consequences are that the RFI schedule cannot be met, and that the two Technical Memoranda scheduled for FY93 either cannot be submitted on schedule or cannot contain all the technical information originally intended. These two circumstances are as follows:

1) Funding received was insufficient to perform the vadose zone investigations and Area V investigations scheduled to begin in the summer of 1992. Therefore, these investigations could not be started and cannot be addressed in Tech Memos 1 and 2, June 14 and September 29, 1993, or in intervening quarterly technical progress reports as noted in the NOD response.

There is no recourse for these investigations other than to reschedule the work for a later time. At present, it appears that the earliest possible start date for these investigations (assuming adequate FY94 funding) is June 1994, with reporting about one year later (two-year delay from NOD schedule).

2) Unexpected long turnaround times are being experienced for samples collected in FY92 (6-8 months for radiological contaminants compared to the expected two months). The impacted field work (completed in FY92 and

early FY93) consisted of the initial grid surface soil, outfalls, and filter building footprint sampling.

The delay in receiving analytical results makes it impossible to completely report these investigations as scheduled on June 14, 1993 in Tech Memo 1. At present, it appears that only about half of the analytical results will be validated and assessed in time for Tech Memo 1.

The third major field activity scheduled in FY92 (site hydrogeologic characterization) proceeded on schedule and can be reported fully as scheduled in the Tech Memo.

Given the situation described above, several alternatives have been considered regarding the scope and content of future technical reports required for the TA-21 RFI:

1) delay scheduled Tech Memos until essentially all technical data for all investigations intended to be addressed in the reports have been received, validated, and assessed;

2) submit curtailed Tech Memos on available results on scheduled report dates and report subsequent results in later memos; or

3) report interim data in quarterly technical progress reports and submit Tech Memos only when technical data are available to permit essentially complete reporting of specific investigations originally meant to be addressed by the Tech Memos.

We prefer Option 3 because it minimizes the burden (to EPA, DOE, and LANL) of preparing, submitting, and reviewing technically incomplete Tech Memos of limited utility while reporting RFI results as they become available. Option 1 portends long delays in reporting, while Option 2 requires redundant, incomplete reports.

To address the immediate circumstances, we propose splitting the two NOD-scheduled FY93 Technical Memoranda for the TA-21 RFI into three Tech Memos as follows:

1. Report FY92 site hydrogeologic work as originally scheduled on June 14, 1993 in Tech Memo 1.

2. Defer the reporting of the vadose zone and Area V investigations (delayed by funding shortfalls) from June 14 and September 29, 1993, (Tech Memos 1 and 2) to August 4, 1995 (Tech Memo 4, which addresses related investigations of Areas T and U). Tech Memo 4 would then fully address the delayed investigations. Of course, this strategy presumes that funding will be available for full start of these investigations early in FY94.

3. Defer reporting of initial grid surface soil, outfalls, and filter building investigations (delayed by slow analytical turn-around) from June 14, 1993 Tech Memo 1 to a currently unscheduled Tech Memo on December 14, 1993. The later report would comprise a complete report of these investigations.

This letter is intended to inform the EPA, R. 6 of the circumstances which have led to the TA-21 RFI schedule and reporting difficulties discussed above. In addition, we seek formal concurrence on our preferred corrective action to address these problems. These issues have been discussed informally with R. 6 EPA personnel on several occasions (as recently as February 1993). Unless otherwise directed, we intend to proceed according to the course of action proposed in this letter.

The last ssue is minor, in that we would like approval to refer to Technical Memoranda as Phase Reports in future correspondence. The Laboratory's Environmental Restoration Program has changed the title of these technical reports in all communication with the 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, and, therefore, requires EPA's approval to officially change the title. The title change does not affect the content of these documents in any way.

Sincerely,

Joseph Vozella, Acting Chief
Los Alamos Area Office

JV/vvm

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

Cy: (w/enclosure)
A. Tiedman, ADO, MS A120
J. Shipley, ET-AETO, MS F641
K. Bitner, DOE-AFO, MS A906
S. Slaten, DOE-LAAO, MS A316
R. Vocke, EM-13, MS M992
L. Soholt, EM-13, MS M992
B . Garcia, NMED, Santa Fe, NM
K. Sisneros, NMED, Santa Fe, NM
B. Driscoll, Region 6 U. S. EPA, Dallas, TX
K. Hargis, EM-8, MS K490
G.Eller, INC-9, MS J519
C. Mack, LC-GL MS A187
T. Glatzmaier, EES-5/EM-13, MS M992
EM-13 File, (EM-13-93-301)
RPF, MS M707
CRM-4, MS A150

ATTACHMENT I,

(Pg 184)

TABLE 3.1-I. SUMMARY OF TECHNICAL REPORTS FOR THE TA-21 OPERABLE UNIT RFI

Report Type	Date	Content
FY 92 Reports		
Quarterly Technical Report	15 Feb 92	Oct-Dec 91 - Project initialization
Quarterly Technical Report	15 May 92	Jan-Mar 92 - Progress: mobilization for 1st surface grid sampling - Progress: geologic mapping
Quarterly Technical Report	15 Aug 92	Apr-Jun 92 - Progress: field work, 1st grid sampling - Progress: mobilization for 2nd surface grid/outfalls sampling - Progress: geologic mapping, stratigraphy, geomorphology, faults/fractures study
FY 93 Reports		
Quarterly Technical Report	15 Nov 92	Jul-Sep 92 - Raw Data: 1st surface grid sampling - Progress: field work, 2nd grid sampling - Progress: field work, outfalls characterization - Progress: geologic mapping, stratigraphy, geomorphology, faults/fractures study - Progress: mobilization for first round of vadose zone investigation and MDA V characterization
Quarterly Technical Report	15 Feb 93	Oct-Dec 92 - Raw Data: half of 2nd surface grid sampling - Raw Data: outfalls characterization - Progress: data assessment for 1st half surface grid sampling - Progress: data assessment for first year of geologic mapping, stratigraphy, geomorphology, faults/fractures study; - Progress: field work, vadose zone investigations - Progress: field work MDA V investigations

TABLE 3.1-I. SUMMARY OF TECHNICAL REPORTS FOR THE TA-21 OPERABLE UNIT RFI

Report Type	Date	Content
Quarterly Technical Report	15 May 93	Jan-Mar 93 - Raw Data: second half of 2nd surface grid sampling - Progress: data assessment for outfalls, 2nd surface grid sampling - Progress: geologic mapping, stratigraphy, geomorphology, faults/fractures study; - Raw Data: first round vadose zone investigation
TECHNICAL MEMORANDUM 1	14 Jun 93	Surface Grids and Outfalls
Quarterly Technical Report	15 Aug 93	Apr-Jun 93 - Progress: geologic mapping, stratigraphy, geomorphology, faults/fractures study - Progress: preparation of Tech Memo 1 - Raw Data: MDA V initial subsurface investigations - Progress: data assessment for MDA V initial subsurface investigation - Progress: data assessment for first round of vadose zone investigation
FY 94 Reports		
TECHNICAL MEMORANDUM 2	29 Sep 93	Vadose Zone/MDA V
Quarterly Technical Report	15 Nov 93	Jul-Sep 93 - Progress: geologic mapping, stratigraphy, geomorphology, faults/fractures study - Status: completion of Tech Memo 1 - Progress: preparation of Tech Memo 2
Quarterly Technical Report	15 Feb 94	Oct-Dec 93 - Progress: data assessment for completion of geomorphology, faults/fractures, and mineralogy studies - Status: completion of Tech Memo 2
Quarterly Technical Report	15 May 94	Jan-Mar 94 - Progress: mobilization for initial subsurface investigations at MDA T and MDA U, and second round of vadose zone investigation (Seq. 7)

TABLE 3.1-I. SUMMARY OF TECHNICAL REPORTS FOR THE TA-21 OPERABLE UNIT RFI (CONTINUED)

Report Type	Date	Content
Quarterly Technical Report	15 Aug 94	Apr-Jun 94 - Progress: mobilization for initial near-surface investigations at MDA's and non-MDA SWMU's - Progress: field work, second round of vadose zone investigation
FY 95 Reports		
Quarterly Technical Report	15 Nov 94	Jul-Sep 94 - Progress: field work, initial near-surface investigations at a first set of non-MDA SWMU's - Progress: field work, initial near-surface investigations at MDA's - Progress: field work, MDA T and MDA U initial subsurface investigations
Quarterly Technical Report	15 Feb 95	Oct-Dec 94 - Raw Data: initial near-surface investigations for MDA's - Progress: data assessment for initial near-surface investigations at MDA's - Raw Data: MDA U initial subsurface investigations - Raw Data: vadose zone second round of investigation - Progress: data assessment for initial subsurface investigations at MDA U - Progress: data assessment second round of vadose zone investigations
Quarterly Technical Report	15 May 95	Jan-Mar 95 - Raw Data: initial near-surface investigations of a first group of non-MDA SWMU's - Progress: data assessment for first set of non-MDA SWMU's initial near-surface investigations - Progress: mobilization for initial subsurface investigations at MDA B and MDA A - Raw Data: MDA T initial subsurface investigations - Progress: data assessment for initial subsurface investigations at MDA T and MDA U - Progress: data assessment second round of vadose zone investigations
TECHNICAL MEMORANDUM 3	28 Jul 95	Near-surface investigations at MDA and non-MDA SWMU's
TECHNICAL MEMORANDUM 4	4 Aug 95	MDA T and MDA U initial subsurface investigations

(Pg 3-8 4/)

TABLE 3.1-I. SUMMARY OF TECHNICAL REPORTS FOR THE TA-21 OPERABLE UNIT RFI (CONTINUED)

Report Type	Date	Content
Quarterly Technical Report	15 Aug 95	Apr-Jun 95 - Progress: mobilization for near-surface investigations of a second set of non-MDA SWMU's (Seq. 4) - Progress: field work, near-surface investigations at second set of non-MDA SWMU's - Progress: preparation of Tech Memo 3 - Progress: mobilization for initial subsurface investigations at MDA B and MDA A - Progress: field work, MDA B initial subsurface investigations - Progress: preparation of Tech Memo 4
FY 96 Reports		
Quarterly Technical Report	15 Nov 95	Jul-Sep 95 - Status: completion of Tech Memo 3 - Progress: field work, MDA A initial subsurface investigation - Status: completion of Tech Memo 4
Quarterly Technical Report	15 Feb 96	Oct-Dec 95 - Raw Data: second set of non-MDA SWMUs initial near-surface investigations - Progress: data assessment for second set of non-MDA SWMUs initial near-surface investigations - Progress: mobilization for MDA T subsequent subsurface investigations (Seq. 9)
TECHNICAL MEMORANDUM 5	24 Apr 96	Near-surface investigations at non-MDA SWMU's
Quarterly Technical Report	15 May 96	Jan-Mar 96 - Progress: data assessment for initial investigations at second det of non-MDA SWMU's - Progress: preparation of Tech Memo 5 - Progress: mobilization for MDA T subsequent subsurface investigations (Seq. 9) - Raw Data: MDA B and MDA A initial subsurface investigations - Progress: data assessment for initial subsurface investigations at MDA B and MDA A
TECHNICAL MEMORANDUM 6	24 Jul 96	MDA B and MDA A initial subsurface investigations