



Department of Energy

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

MAY 14 1993

Ms. Guanita Reiter, Acting Chief
RCRA Permits Branch
U. S. Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

Dear Ms. Reiter:

The Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Work Plan for Technical Area (TA)-21 Operable Unit (OU) 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 ("NOD schedule") addressing both the sequence of the TA-21 field investigations, and the content and timing of the technical reports to EPA. The enclosure to this letter is an excerpt from the work plan addendum, showing the scheduled dates and content of the technical reports (quarterly reports and technical memoranda).

As detailed below, circumstances subsequent to our response to the NOD have caused the TA-21 RFI schedule to slip significantly. The consequences are that the commitments in the response to the NOD cannot be met, and that the two technical memoranda scheduled for Fiscal Year (FY) 1993 either cannot be submitted on schedule or cannot contain all the technical information originally intended. Circumstances impacting the two technical memoranda are discussed below.

Technical Memorandum 1. Unexpected long turnaround times are being experienced for samples collected in FY 1992 (six to eight months for radioactive contaminants, compared to the expected two months). These delays impact data from several FY 1992 field investigations including: OU-wide grid surface soil sampling, outfall surface soil sampling, and filter building footprint surface soil sampling. The delay in receiving analytical results makes it impossible to report on these investigations in Technical Memorandum 1 on June 14, 1993.

In addition, a portion of the outfall investigations could not be conducted because of National Emission Standards for Hazardous Air Pollutants (NESHAP) compliance issues associated with drilling operations in a radioactively contaminated environment. These investigations will be rescheduled at the first opportunity, which currently appears to be during the summer of 1994.

However, the following other major field activities conducted in FY 1992 have maintained their schedule and can be reported as planned: geologic mapping, fault and fracture measurements, geomorphic mapping, stratigraphic section measurements, and outcrop mineralogy studies.



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We will report the work not impacted by analytical delays or NESHAP compliance issues in a Technical Memorandum 1A, as scheduled on June 14, 1993. We propose to report on the investigations delayed by slow analytical turnaround in a follow-up Technical Memorandum 1B, which we propose to submit on December 14, 1993. This six-month delay is consistent with the six-month delay in receiving analytical results. The work postponed because of NESHAP compliance issues will be included in the FY 1994 field investigations and will be reported in Technical Memorandum 3, the schedule for which is presently unaffected (see enclosure).

Technical Memorandum 2. Funding received in FY 1992 was insufficient to perform the vadose zone and Area V investigations scheduled to begin in the summer of 1992. The investigations were not started, and cannot be reported in Technical Memorandum 2 scheduled for September 29, 1993, nor in the intervening quarterly technical progress reports. The delay of these initial subsurface investigations also will impact all subsequent subsurface investigations, which depend on the information that was to be acquired in the initial work.

There is no recourse for this schedule slippage except to reschedule the work for a later time. At present, it appears that the earliest possible start date for these subsurface investigations is June 1994. This is a two-year delay from the original schedule, and assumes adequate funding in FY 1994 and FY 1995.

For the vadose zone and Area V investigations, and subsequent dependent investigations, we propose to prepare a new schedule as follows: Technical Memorandum 2 will be due in late summer 1995, with the dependent Technical Memoranda 4, 6, 8, and 9 following at approximately one-year intervals. Overall, this schedule would result in a one-year delay in the completion of this series of Technical Memoranda if we can remove the scheduled one-year hiatus that appears between Technical Memoranda 2 and 4 in the NOD schedule. These actions are, of course, dependent on adequate funding in each fiscal year.

This letter is intended to inform EPA Region 6 of the circumstances which have led to the TA-21 OU-1106 RFI schedule and reporting difficulties discussed above. In addition, we seek concurrence on our proposed actions with regard to rescheduling certain activities and splitting Technical Memorandum 1 into two parts, 1A and 1B. The funding, schedule, and NESHAP compliance issues addressed above have been discussed informally with EPA Region 6 personnel on several occasions dating from August 1992, and as recently as February 1993. Each of the issues has been previously identified and addressed in each of our quarterly technical progress reports, commencing with the report for the third quarter of FY 1992 issued in August 1993. Unless otherwise directed, we intend to proceed according to the course of action proposed in this letter. We are in the process of preparing a revised schedule incorporating these changes and plan to submit it formally for approval to have it replace the NOD schedule.

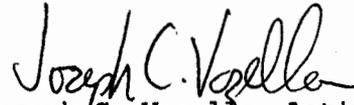
One final issue is minor, in that we would like approval to refer to technical memoranda as "phase reports" in future correspondence. Los Alamos

Ms. Guanita Reiter

3

National Laboratory's Environmental Restoration Program has changed the title of these technical reports in all communication with 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-1106, and therefore EPA's approval is needed to officially change the title. The title change does not affect the content of these documents in any way.

Sincerely,



Joseph C. Vozella, Acting Chief
Environment, Safety and Health Branch

LESH:6SS-097

Enclosure:

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

cc w/enclosure:

K. Sisneros, New Mexico
Environment Department
1190 St. Francis Drive
Santa Fe, NM 87502
B. Driscoll, RCRA Permits Branch
U. S. EPA, Region 6
1445 Ross Ave, Suite 1200
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R. Vocke, EM-13, LANL, MS-M992
K. Bitner, ERPO, AL

cc w/o enclosure:

B. Garcia, Bureau Chief
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S. Slaten, ES&H, LAEO
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J. Shipley, EE-AETO, LANL, MS-F641
L. Soholt, EM-13, LANL, MS-M992
K. Hargis, EM-8, LANL, MS-K490
G. Eller, INC-9, LANL, MS-J534
C. Mack, LC-GL, LANL, MS-A187
T. Glatzmaier, EES-5/EM-13, LANL,
MS-M992
EM-13 File, (EM-13-93-301), LANL,
MS-M992

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

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Report Type	Date	Content
Quarterly Technical Report	15 May 93	<p>Jan-Mar 93</p> <ul style="list-style-type: none"> - 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; <p>- Raw Data: first round vadose zone investigation</p>
TECHNICAL MEMORANDUM 1	14 Jun 93	Surface Grids and Outfalls
Quarterly Technical Report	15 Aug 93	<p>Apr-Jun 93</p> <ul style="list-style-type: none"> - Progress: geologic mapping, stratigraphy, geomorphology, faults/fractures study - Progress: preparation of Tech Memo 1 <p>- Raw Data: MDA V initial subsurface investigations</p> <ul style="list-style-type: none"> - 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	<p>Jul-Sep 93</p> <ul style="list-style-type: none"> - Progress: geologic mapping, stratigraphy, geomorphology, faults/fractures study - Status: completion of Tech Memo 1 <p>- Progress: preparation of Tech Memo 2</p>
Quarterly Technical Report	15 Feb 94	<p>Oct-Dec 93</p> <ul style="list-style-type: none"> - Progress: data assessment for completion of geomorphology, faults/fractures, and mineralogy studies <p>- Status: completion of Tech Memo 2</p>
Quarterly Technical Report	15 May 94	<p>Jan-Mar 94</p> <ul style="list-style-type: none"> - 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	<p>Apr-Jun 94</p> <ul style="list-style-type: none"> - 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	<p>Jul-Sep 94</p> <ul style="list-style-type: none"> - 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	<p>Oct-Dec 94</p> <ul style="list-style-type: none"> - 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	<p>Jan-Mar 95</p> <ul style="list-style-type: none"> - 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

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	<p>Apr-Jun 95</p> <ul style="list-style-type: none"> - 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 <ul style="list-style-type: none"> - 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	<p>Jul-Sep 95</p> <ul style="list-style-type: none"> - Status: completion of Tech Memo 3 <ul style="list-style-type: none"> - Progress: field work, MDA A initial subsurface investigation - Status: completion of Tech Memo 4
Quarterly Technical Report	15 Feb 96	<p>Oct-Dec 95</p> <ul style="list-style-type: none"> - 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 <ul style="list-style-type: none"> - 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	<p>Jan-Mar 96</p> <ul style="list-style-type: none"> - Progress: data assessment for initial investigations at second set of non-MDA SWMU's - Progress: preparation of Tech Memo 5 <ul style="list-style-type: none"> - 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

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 96	<p>Apr-Jun 96</p> <ul style="list-style-type: none"> - Progress: mobilization for subsequent near-surface investigations at non-MDA SWMU's (Seq. 5) - Progress: field work, subsequent near-surface investigations at non-MDA SWMU's - Status: completion of Tech Memo 5 <ul style="list-style-type: none"> - Progress: field work, MDA T subsequent subsurface investigations - Progress: preparation of Tech Memo 6
FY 97 Reports		
Quarterly Technical Report	15 Nov 96	<p>Jul-Sep 96</p> <ul style="list-style-type: none"> - Progress: field work, subsequent near-surface investigations at non-MDA SWMU's - Status: completion of Tech Memo 6
Quarterly Technical Report	15 Feb 97	<p>Oct-Dec 96</p> <ul style="list-style-type: none"> - Raw Data: non-MDA SWMU's subsequent near-surface investigations - Raw Data: MDA T subsequent subsurface investigations
Quarterly Technical Report	15 May 97	<p>Jan-Mar 97</p> <ul style="list-style-type: none"> - Progress: data assessment for subsequent near-surface investigations at non-MDA SWMU's - Progress: data assessment for subsequent subsurface investigations at MDA T
TECHNICAL MEMORANDUM 7	20 Jun 97	Subsequent near-surface investigations at MDA's and non-MDA SWMU's
TECHNICAL MEMORANDUM 8	25 Jul 97	Subsequent subsurface investigations at MDA T
Quarterly Technical Report	15 Aug 97	<p>Apr-Jun 97</p> <ul style="list-style-type: none"> - Progress: preparation of Tech Memo 7 - Progress: mobilization for subsequent subsurface investigations at MDA V, MDA U, MDA A, and MDA B (Seq. 10) - Progress: field work, subsequent subsurface investigations at MDA V - Progress: preparation of Tech Memo 8

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

Report Type	Date	Content
FY 98 Reports		
Quarterly Technical Report	15 Nov 97	Jul-Sep 97 - Status: completion of Tech Memo 7 - Progress: field work, subsequent subsurface investigations at MDA U, MDA B, MDA A - Progress: preparation of RFI Report - Status: completion of Tech Memo 8
Quarterly Technical Report	15 Feb 98	Oct-Dec 97 - Raw Data: MDA B, MDA U, MDA A subsequent subsurface investigations - Progress: Data Assessment for MDA B subsequent subsurface investigations - Progress: preparation of RFI Report
Quarterly Technical Report	15 May 98	Jan-Mar 98 - Raw Data: MDA V subsequent subsurface investigations - Progress: Data Assessment for MDA V, MDA U, MDA A, and MDA B subsequent subsurface investigations - Progress: preparation of RFI Report
TECHNICAL MEMORANDUM 9	14 Aug 98	Subsequent investigations at MDA V, MDA U, MDA A, and MDA B
Quarterly Technical Report	15 Aug 98	Apr-Jun 98 - Progress: preparation of Tech Memo 9 - Progress: preparation of RFI Report - Progress: preparation of CMS Plan
FY 99 Reports		
Quarterly Technical Report	15 Nov 98	Jul-Sep 98 - Progress: preparation of RFI Report - Progress: preparation of CMS Plan - Status: completion of Tech Memo 9

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

Report Type	Date	Content
Quarterly Technical Report	15 Feb 99	Oct-Dec 98 - Progress: preparation of RFI Report - Progress: preparation of CMS Plan
Quarterly Technical Report	15 May 99	Jan-Mar 99 - Progress: preparation of CMS Plan - Status: completion of RFI Report
Quarterly Technical Report	15 Aug 99	Apr-Jun 99 - Status: completion of CMS Plan