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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

February 7, 1992

Ms. Julie Erickson, Branch Chief  
US Department of Energy  
P.O. Box 550, Mail Stop A6-95  
Richland, Washington 99352

Re: Descriptions of Work (DOW) for Field Investigations

Dear Ms. Erickson:

There has been a lot of discussion lately concerning the purpose and content of DOW's. This letter is intended to transmit Ecology's minimum requirements so that investigations proceed without delays.

To date, the three parties have had difficulty coming to agreement on the content of DOW's, length of regulatory review time, and disposition of regulatory comments. Ecology believes that the DOW's should provide a detailed description of how, where, how many, by whom, and when field testing, field sampling, and analysis will be conducted to support the Remedial Investigations (RI)/RCRA Facility Investigations (RFI) reports. Below is a list of those requirements:

- 1) A schedule for transmittal of all planned DOW's should be given to the Operable Unit (OU) managers. The purpose of this is to assist the regulators in scheduling their time so that lack of concurrence does not prevent USDOE from performing field investigations.
- 2) Until the work plans are approved each DOW must include a provision for the lead regulatory agency signature.
- 3) After the work plans are approved the DOW's will no-longer require regulatory signatures. They must, however, be submitted for regulatory review and comment by the lead regulatory agency and submitted for review to the supporting regulatory agency.
- 4) A minimum of 10 working days after receipt for regulatory review. If comments are not transmitted on or before the 10th day, or if relief from the 10-day requirement is not requested then USDOE may assume that the regulators have no comments and proceed with the field work. Comments that are submitted must be resolved before USDOE can commence field work.
- 5) Any field change to an approved DOW, must be documented in an Project Change Form (PCF). The PCF must be transmitted to the regulators within



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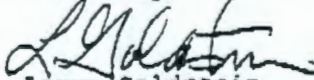
- 10 working days of the implementation of the change. Changes to DOW's that have not been reviewed/approved must result in revisions to the DOW.
- 6) The DOW must identify the applicable sections in each EII that are proposed in each DOW. If an EII discusses several ways to perform the same task, then the DOW must state which procedure is proposed.
- 7) Each task should have it's own DOW. The DOW's cannot be used for multiple investigations unless the lead regulatory agency concurs.
- 8) The DOW's must identify the proposed location for sampling and the criteria for selecting those locations. A legible scaled map identifying the proposed sample locations must be included in each DOW. An appropriate scale would be one inch equals 200 meters.
- 9) The DOW's must estimate the proposed sampling dates. The regulators must have this information to plan site visits and to schedule the collection of split samples. Field activity sheets should also be submitted before commencing field work.
- 10) Proposed field screening that is not described in detail in the work plan or an approved EII must be described in the DOW.
- 11) Calibrating standards and frequency, if not specifically identified in the EII's must be presented in the DOW.
- 12) The DOW must discuss hazardous, radioactive, and mixed waste that may be present in the area being sampled. We must not pass up a valuable opportunity to identify new locations of radiation or hazardous chemicals.
- 13) The frequency of measurement must be included in the DOW (e.g., 5 foot intervals and lithology breaks), even if this information is in the work plan.
- 14) Data collection procedures, chain of custody procedures, sample container size and preparation, holding times, type of analysis, number of split samples, number of duplicate samples, number of blank samples, and data reporting requirements must be referenced by EII or described in the DOW.
- 15) The duties and responsibilities of all field personnel must be referenced by EII or described in the DOW.
- 16) The DOE must include the approved and/or proposed data quality objectives, as specified in the work plan for each type of activity.

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- 17) The DOW must include the pre-sampling activities that will be necessary before any field activities commence.
- 18) The DOW must include the number of and types of field equipment that are proposed for use.
- 19) Sample status check sheets must be submitted within 10 days of the sampling event.
- 20) The DOW must contain a scope of work introductory section.
- 21) The USDOE Hanford Project Manager is to send a letter to the EPA and Ecology Hanford Project Managers, declaring that all DOW regulatory comments will be resolved before field work commences.
- 22) If regulatory comments are not resolved then the lead regulatory agency may withhold approval of the primary document (RI or RFI report).

These requirements are intended to assist you and your staff in preparing future DOW's. If you have any questions please contact Richard Hibbard of my staff. Mr. Hibbard can be reached at (206) 493-9367.

Sincerely;



Larry Goldstein  
CERCLA Unit Supervisor  
Nuclear and Mixed Waste Management

cc: Paul Day, EPA  
Steve Wisness, USDOE  
Darci Teel, Ecology  
Dave Jansen  
Rich Hibbard

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J. Erickson, RL

Correspondence No.

Incoming 9201751

Subject: DESCRIPTIONS OF WORK FOR FIELD INVESTIGATIONS

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