



General
 State of New Mexico
ENVIRONMENT DEPARTMENT
 Harold Runnels Building
 1190 St. Francis Drive, P.O. Box 26110
 Santa Fe, New Mexico 87502
 (505) 827-2850

*Claudia,
 my penning file
 sent*

JUDITH M. ESPINOSA
 SECRETARY

RON CURRY
 DEPUTY SECRETARY

BRUCE KING
 GOVERNOR
 February 11, 1994

MS. Barbara Driscoll
 RCRA Permits Branch
 U.S. Environmental Protection Agency
 Region 6
 1445 Ross Avenue
 Suite 1200
 Dallas, Texas 75202-2733

Dear Ms. Driscoll:

This letter is in regard to the use of archival data regarding decisions on RFI workplans. The RCRA Permitting and Technical Programs are concerned that we do not know how EPA evaluates the archival data to make their determination as to whether to accept or deny the proposals that are made concerning archival data. Both programs believe that archival data should be scrutinized like any other data received from a facility.

For example, archival data was used in the LANL Work Plan for Operable Unit 1129 to evaluate and identify SWMUs for which no potential hazard exists, and to determine whether the initial characterization effort will be a broad based Phase 1 field investigation or a more detailed Phase 2 investigation. Archival data has also been used to make other determinations on work plans.

The State is pursuing HSWA authorization and expects to receive authorization within the next few years. It would be most helpful if the State and EPA could establish a level of confidence and collaborative agreement regarding the use of archival data for making decisions on RFI Work Plans. We are therefore requesting EPA to provide the State with the guidelines being used to evaluate archival data. If there are no guidelines then perhaps the State and EPA should work together and set guidelines.

Your prompt consideration of this matter is appreciated. Please contact either Steve Alexander or me at (505) 827-4308.

Sincerely,

for Robert J. Hoditschek
 Barbara Hoditschek, Prog. Mgr.
 RCRA Permit Program

cc: Benito Garcia, Chief HRMB
 Steve Alexander, Prog. Mgr., Technical Prog.



12471