Following is a listing of due dates for RFI Reports which were included in the RFI Work Plan approval letters for the indicated Operable Units. EPA determined RFI Report due dates for SWMUs in these workplans based on projected field work by LANL.

EPA expressed concern in a letter dated December 5, 1996, that LANL had missed the report due dates for several RFI Reports, and requested an explanation for the delays in the RFI Reports as well as a listing of all RFI Reports to be submitted in FY96. (A copy of EPA's letter is attached for NMED)

LANL's response letter is dated February 6, 1996. The list of RFI reports to be completed in FY96 does not include many of the deliverables required under the RFI work plan approval letters.

EPA is also concerned about a statement in the Environmental Restoration Project Progress Tracking System (PTS) Monthly Report for November 1995 dated December 20, 1995. The statement was included in the narrative for Field Unit 4 on page 32:

> "FU-4 is attempting to reduce costs by delaying Data Assessment activities. Inevitably the effect will be to delay the issue of the RFI Reports, ultimately increasing their total costs..."

EPA is concerned that this is a lab-wide practice in the ER program as analytical delays were cited for numerous delays in RFI reports. LANL should outline the exact nature of their analytical delays and how these are being addressed.

LANL indicated in the conference call on 2/12/96 that the changes in report submittals may be due to changes in priorities. LANL should provide information on how sites are now being prioritized, and what are the high priorities for FY96.

HSDA LANL 6/P/96

RFI Report Dates

OU 1136 Approved 9/23/94

All units due: 4-23-98 Technical Area 43

OU 1132

SWMU	Rpt Due	Rept. Rec
39-001 (a)	11-1-95	extension granted to 6/6/96:
39-001(b)	11-1-95	"
	This Report is not projected for FY96	
39-002 (a)	4-16-95	5/2/96
39-005	4-16-95	"
39-006 (a)	4-16-95	"
39-007 (a)	4-16-95	"
39-008	6-6-96	
39-004 (a-e)	6-6-96	

OU 1093

SWMU	Rpt Due	Rpt Rec
27-001	1/30/95	2/3/95
27-003	1/30/95	"
18-001 (a-c)	1/30/95	"
18-007	1/30/95	"
all others	10/31/95	11/13/95

OU 1130

SWMU	Rpt Due	Rpt Rec
36-001	4-30-96	Proposed 6/26/96
36-002	7-16-95	7/29/95
36-003 (a,b)	9-30-95	10/2/95
36-004(d)	9-30-95	"
36-005	9-30-95	"
36-006	9-30-95	"
C-36-003	9-30-95	"

OU 1157

SWMU	Rpt Due	
8-003(a)	4-30-96	Report not projected for FY96
9-001(c)	"	
9-003(a,b,d,e)	"	
9-005(a,d)	"	
9-006	"	
9-012	"	

All others due 5-30-95 not received projected for 9/15/96

OU 1140

Report Due	SWMUs
10-1-96	46-002
5-1-96**	46-003(a,b,c,e,f,g,h); 46-004(t); 46-005; 46-006(c); 46-009(a,b); 46-010(d)
6-1-97	46-003(d); 46-004(c,d,e,p)
9-1-95*	46-004(a2,b,b2,c2,d2,f,g,h,m,q,r,s,u,v,w,x,y,z); 46-006(a,b,d,f,g); 46-007; 46-008(a,b,d,e,f,g)

* Not Rec Projected for 6/30/96 but projected report does not include all required SWMUs from this overdue report
** Report not projected for FY96

OU 1111

Rpt Due	SWMUs
3-29-95*	6-007(f,g); 7-001(a,b,c,d) not rec
4-24-95*	22-012; 22-014(a,b); 22-015(a,b,c,d,e); 40-005 not rec
6-30-95♦	22-010(a,b); 22-016; 40-001(b,c,); 6-001(a,b); not rec 40-010; 40-004; 6-003(a,c,d,e,f,g); 6-006
5-1-96♥	40-006(a,b,c); 40-009; 6-002
10-4-97	6-007(a,b,c,d,e,); 6-005

* Projected for 6/21/96
♦ Projected for 2/1/96 (Not received yet)
♥ Report not projected for FY96

OU 1071

SWMU	Rpt Due
3-010(a)	4-28-95 rec 5/1/95

OU 1086

Rpt Due	SWMUs
7/30/95	15-004(a,b,c,f), 15-007(b), 15-008(a,b) 15-009(e), 15-009(j), 15-012(b) ext req to 8/30/95 rec 11/3/95
7/30/96*	15-004(g), 15-007(a), 15-008(c), 15-009(a,f,i), 15-010(a-c), 15-011(a-c), 15-014 (a,b,i-l)
7/30/97	15-006(c,d), 15-009(b,c)

* Report projected for 5/22/96 but missing a few SWMUs

OU 1085 Technical Areas 12, 14, 67

All reports due 2-19-96 Projected 2/20/96 Missing a few HSWA SWMUs

OU 1082

Report Due	SWMUs
9-30-96*	11-001(a-c), 11-002, 11-004(a-e), 11-005(a-c), 11-006(a-d), 11-011(a,b,d), 13-003(a), 16-003(a-o), 16-004(a-f), 16-005(n), 16-006(a,c,d,e), 16-007(a), 16-009, 16-010(a,h,i,k,l,m,n), 16-013, 16-016(a-c), 16-020, 16-021(a,c), 16-026(b,c,d,e,h2,j2,v), 16-029(a-g), 16-030(h)
9-30-97	13-001, 13-002, 13-004, 16-001(a-e), 16-005(g,j), 16-008(a), 16-019, 16-035, 16-036

* Report projected for 9/30/96 does not include all required SWMUs

OU 1100

All reports due 10-31-96

OU 1082 Addendum I

Report Due	SWMUs
9-30-97	16-005(c,d,j,m); 16-011; 16-023(b); 16-024(e); 16-025(a-b); 16-025(d-f); 16-025(g-s); 16-025(u,v); 16-026(m-q); 16-026(w); 16-029(f2,h2); 16-029(k-u);16-029(x-z); 16-031(c-d); 16-032(a,c);16-034(a-f); 16-034(l,p)
6-30-98	16-005(a,e,h,k,l); 16-006(g); 16-015(a,b); 16-017; 16-025(b2,c2); 16-025(t); 16-025(w-z); 16-026(s); 16-028(a); 16-029(a2-e2); 16-029(v,w); 16-034(m-o)

DEC 0 5 1995

Mr. Theodore J. Taylor
Program Manager
Department of Energy
Los Alamos Area Office
Los Alamos, NM 87544

Re: Required Submittal of RFI Reports
Los Alamos National Laboratory (NM0890010515)

Dear Mr. Taylor:

Enclosed is a list of solid waste management units (SWMUS) for which RCRA Facility Investigation (RFI) reports are overdue. The Environmental Protection Agency (EPA) has not received any requests for RFI report extensions for these SWMUs. EPA required submittal of these reports when the RFI work plans associated with these SWMUs were approved. The dates for RFI report submittals are enforceable dates under Module VIII of the Resource Conservation and Recovery Act permit for Los Alamos National Laboratory (LANL). Within thirty (30) days of the date of this letter, LANL shall submit a request for RFI report extensions, and provide an explanation why the required report dates were not met. In the same submittal, LANL shall also provide a list of the RFI reports which will be submitted to EPA for FY96. This list shall include the SWMUs which will be addressed in each RFI report.

Should you have any questions, please feel free to contact Ms. Barbara Driscoll at (214) 665-7441.

Sincerely,

David W. Neleigh, Chief
New Mexico and Federal
Facilities Section

Enclosure

cc: Mr. Benito Garcia
New Mexico Environment Department
Mr. Jorg Jansen
Los Alamos National Laboratory, MS M992

GPD-N:BDRISCOLL:BD:12/4/95:F:\USER\BDRISCOL\RFILST.LTR

List of SWMUs With Overdue RFI Reports
Los Alamos National Laboratory

1. Letter from EPA to LANL dated October 7, 1994, Approval of RFI Workplan for Operable Unit 1157 with modifications.

   RFI Report due on 5-30-95 for the following SWMUs:

8-003	9-001(a,b,d)
8-004(a-d)	9-003(g,h,i)
8-005	9-002
8-006(a)	9-008(b)
8-007	9-009
8-009(a)	9-013
8-009(d-e)	C-9-001
C-8-010	

2. Letter from EPA to LANL dated October 14, 1994, Approval of RFI Workplan for Operable Unit 1140 with modifications.

   RFI Report due on 9-1-95 for the following SWMUs:

   46-004(a2,b,b2,c2,d2,f,g,h,m,q,r,s,u,v,w,x,y,z)
   46-006(a,b,d,f,g)
   46-007
   46-008(a,b,d,e,f,g)

3. Letter from EPA to LANL dated October 19, 1994, Approval of RFI Workplan for Operable Unit 1111 with modifications.

   RFI Report due as indicated for the following SWMUs:

Date Due	SWMUs
3-30-95	6-007(f,g); 7-001(a,b,c,d)
4-24-95	22-012; 22-014(a,b); 22-015(a,b,c,d,e); 40-005
6-30-95	22-010(a,b); 22-016; 40-001(b,c,); 6-001(a,b); 40-010; 40-004; 6-003(a,c,d,e,f,g); 6-006