



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544

Chris — General
File —

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

May 16, 1997

David Neleigh
EPA Region VI, 6PD-N
1445 Ross Avenue
Dallas, Texas 75202-2733

Subject: Action Items for State/EPA Meeting Held in Santa Fe, NM, on April 21, 1997

Dear Mr. Neleigh:

The meeting held in Santa Fe, NM, on April 21, 1997, between EPA Region VI and New Mexico Environment Department Hazardous and Radioactive Materials Bureau (NMED HRMB) staff was very productive at identifying numerous recurring issues arising from LANL Corrective Action submittals.

EPA and NMED discussed each specific issue and, in general, reached a unified position for which a position paragraph will be drafted. Several action items and specific assignments for various EPA and NMED staff members are attached for your review and comment.

If you have any questions concerning these items, please call me or Ms. Teri Davis of my staff at (505) 827-1558.

Sincerely,

Robert S. Dinwiddie, Manager
RCRA Permits Management Program

RSD/dww

Attachment

LANL/ER/MISC



13019

cc: T. Davis, NMED HRMB
R. Dinwiddie, NMED HRMB
K. Hill, EPA AIP
J. Parker, NMED DOE OB
S. Yanicak, NMED DOE OB
File: LANL HSWA G/M/G 97
Track: LANL, DOC.DATE, NA, EPA, HRMB/dww, RE, FILE

c:\wpwin\dianne\actltr.wpd

CONFIDENTIAL

ACTION ITEMS FROM PROGRAMMATIC ISSUES MEETING WITH EPA

Topic	Action	Assignee
1) Compositing	A letter stating that any workplan submitted, even though approved, must not use composite sampling. Letter may possibly request workplan addendum. Also, a position paragraph stating compositing is unacceptable. For Past RFI Work Plans, Agency initiated modification or something comparable.	Barbara Toth (NMED HRMB)
2) NODs 2a) AIP to provide compilation of AIP comments 2b) EPA to provide pre-1996 NOD comment compilation	Look at LANL database for NOD information. Depending on useability of this information, work towards compilation of repeat items from past NODs. Write a letter to LANL indicating repeat items.	Kim Hill (EPA IPA) and Dianne Wilburn (NMED HRMB)
3) Depth of Sampling	Draft a position paragraph for add/edit by EPA/HRMB/AIP, etc.	Allen Chang (EPA)
4) Filtered and Unfiltered Samples	Draft position paragraph based on 5/16/95 EPA Letter.	Kim Hill (EPA IPA)
5) MCEs	Look at EPA summary memo, work with Jeff Yurk, EPA, on use of background levels. Develop Position/Methodology for calculating/screening of COPCs.	Barbara Toth (NMED HRMB)
6) Work Plan Variances	Review RFI Framework and ensure Work Plan Variances are noted in field notification letters and RFI Reports.	Kim Hill (EPA IPA) and Dianne Wilburn (NMED HRMB)
7) NFAs	Draft position paper outlining what is acceptable for NFA supporting documentation. Use criteria listed in DOU. Write a paragraph to spell out what is wanted. Look at other facilities petition for NFA for examples. Goal to specify minimum documentation for NFA.	Kim Hill (EPA IPA) and Dianne Wilburn (NMED HRMB)

8) RFI Report	Review RFI Report Framework	Kim Hill (EPA IPA) Dianne Wilburn (NMED HRMB) and Dave Englert (NMED AIP)
9) Field Screening	Compile a list of field screening methods used by LANL for characterization, provide detection levels with any inferences that field conditions may adversely affect; and indicate if EPA approved.	Ralph Ford-Schmidt and Steve Yanicak (NMED AIP)
10) Rad Risk Assessment	Draft position paragraph.	Barbara Toth (NMED HRMB)
11) Total Number of Samples	Find guidance or regulations stating 20% of samples must be analyzed at a fixed laboratory, lab use and confirmatory sampling.	Barbara Toth (NMED HRMB) and Michael Chacon (NMED HRMB)
12) Land Use Scenarios	Look at DOE and County future land use plans. Review for Risk Assessment.	Barbara Toth (NMED HRMB)
13) Minimum Requirements for Data Comparisons	Roll into RFI Framework comments: Add detection limits, methods, QC info, etc. See Item 8.	Kim Hill (EPA IPA) Dianne Wilburn (NMED HRMB) and Dave Englert (NMED AIP)
14) Background and Cleanup Levels	Background level information review and review EPA comments.	Barbara Toth (NMED HRMB)
15) Accelerated Cleanup	EPA and AIP to comment on LANL document, "Corrective Action Flow Process."	Teri Davis (NMED HRMB)
16) Raw Data Audit	Perform audits of data repository	HRMB (Inspection/Enforcement)