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ORGANIZATION: DOE

ORIGINATOR NAME: ALLYN M. DAVIS

ORGANIZATION: EPA

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SUBJECT: EPA REVIEW AND APPROVAL OF RCRA RFI WORK PLAN FOR OU 1132 WITH
ENCLOSED MODIFICATION

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A LIST SUBJECT: MODIFICATIONS OPERABLE UNIT 1132

B LIST SUBJECT: LIST OF MODIFICATIONS OPERABLE UNIT 1130

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

SEP 22 1994

Mr. Joseph C. Vozella, Chief
Environment, Safety and Health Branch
Los Alamos Area Office
Department of Energy
Los Alamos, NM 87544

Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has reviewed and approves the RCRA Facility Investigation (RFI) work plan for Operable Unit 1132 with the enclosed modification. The approved workplan shall consist of the RFI work plan submitted on June 18, 1993, the NOD response dated May 3, 1994 and the enclosed modification. LANL shall immediately implement this work plan according to the proposed schedule.

Should you have any questions, please contact Barbara Driscoll of my staff at (214) 665-7441.

Sincerely yours,

Jack Davis

for Allyn M. Davis, Director
Hazardous Waste Management Division

Enclosure (1)

cc: Kathleen Sisneros, Director
Water and Waste Management Division
New Mexico Environment Department

Jorge Jansen, Program Manager
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YCG

cc: T. Glatzmaier
D. McInerney
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Modifications
Operable Unit 1132

1. Final RPI Reports for each SWMU are due as indicated below:

<u>SWMU</u>	<u>RPI Report Due</u>
39-001 (a)	11-1-95
39-001 (b)	11-1-95
39-002 (a)	4-16-95
39-004 (a-e)	6-6-96
39-005	4-16-95
39-006 (a)	4-16-95
39-007 (a)	4-16-95
39-008	6-6-96

**List of Modifications
Operable Unit 1130**

1. Final RFI Reports for each SWMU are due as indicated below:

<u>SWMU</u>	<u>RFI Report Due</u>
36-001	4-30-96
36-002	7-16-95
36-003 (a,b)	9-30-95
36-004(d)	9-30-95
36-005	9-30-95
36-006	9-30-95
C-36-003	9-30-95

Sites 36-004(d) including the Skunk Works and burning pits, as well as, site 36-006, disposal area are not deferred and sampling should occur at the sites in 1995. RFI Reports are due as indicated for these sites.

2. Outfall C-36-003 is a SWMU, as it has handled photo-processing fluids which include hazardous constituents. EPA's deficiency #7 in the NOD indicated that this unit should be added to the permit, and EPA has done so. Corrective action is not included in an NPDES permit, and this outfall has not been under an NPDES permit for the entire time that it was active. In addition, LANL shall provide a revised figure indicating the location of samples closer to the outfall.

3. Analysis for mercury by EPA Method 7471 cannot be dropped at the following units:

a. NDA AA - This is a disposal area which handled waste from the firing sites; therefore, if mercury is a potential contaminant of concern (PCOC) for the firing sites, it should also be included as a PCOC for this site.

b. LANL shall add mercury to the list of constituents being analyzed in section 5.3.5.1.4 for the two septic systems.