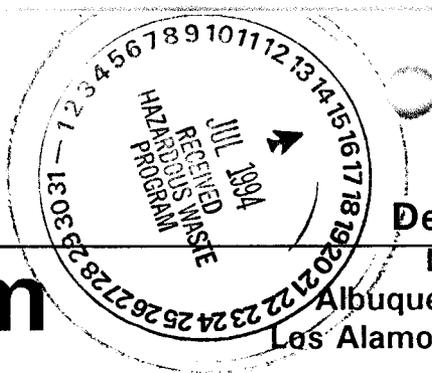


Permit



WMS  
Hazard permit

United States Government

Department of Energy

# memorandum

Los Alamos Area Office

Albuquerque Operations Office

Los Alamos, New Mexico 87544

DATE: JUL 12 1994

DATE:

REPLY TO LESH:TJT:Prioritization:1.4.2.6.3.3.8

ATTN OF:

SUBJECT: EPA Disapproval of Prioritization

IVX

TO: H. Jansen, Program Manager, UC-LANL, EM/ER, MS M992

LANL HUNDA GEN PERMIT

Attached is a letter from William K. Honker, dated June 27, 1994 and received by LAAO on July 11, 1994. Mr. Honker indicates extreme concern regarding the Environmental Restoration (ER) Program's inability to demonstrate that priorities for field work and RFI Reports, as contained in the Baseline, are consistent with the prioritization agreements reached with the U.S. Environmental Protection Agency (EPA) and the New Mexico Environment Department. Mr. Honker indicates that unless we can provide such demonstration by August 5, 1994, the EPA will set schedules for the ER Program by modifying Module VIII of the Laboratory's RCRA permit.

Please call me at 665-7203 as soon as possible to discuss this matter.

Theodore J. Taylor  
Program Manager  
Environmental Restoration Program

### Attachment

- cc w/attachment:
- T. Taylor, ESH, LAAO
- C. Fesmire, LAAO/Scientech
- K. Boardman, ERPO, AL, MS A906
- J. Levings, ERPO, AL, MS A906
- RPF, MS M707
- J. Vozella, ESH, LAAO
- W. Spurgeon, EM-452, HQ
- T. Baca, EM-DO, UC-LANL, MS J591
- B. Driscoll, EPA, Region 6
- B. Hoditschek, NMED
- B. Swanton, NMED/AIP, MS J993



15385

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

Rec'd LAAO  
Mail Room  
7/11/94 2:07p.m.  
TSJ

JUN 27 1994

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

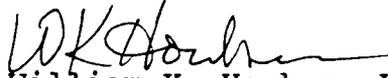
Dear Mr. Vozella:

The Environmental Protection Agency (EPA) has expressed concern at several of the monthly meetings and in Notice of Deficiencies over the lack of schedules in RCRA Facility Investigation (RFI) work plans, as well as, the length of time that Los Alamos National Laboratory (LANL) is requesting to complete field work and submit RFI reports. At two recent meetings (April 22 and June 22), EPA proposed that LANL revise their schedules for submittal of RFI reports to reflect completion of investigations at high, medium and low priority solid waste management units (SWMU) as defined by the Site Prioritization Rankings within each Operable Unit (OU).

Because LANL has indicated that they have received budget shortfalls, and may not be able to complete work as approved in the RFI work plans as scheduled, EPA agreed to work with the facility on prioritizing and scheduling work. It was EPA's understanding that by prioritizing SWMUs and OUs that LANL would fully fund the highest priority units first, as well as, all investigations of property previously owned by the Department of Energy (DOE). EPA's review of schedules as presented in the latest DOE baseline for LANL does not reflect that work is being conducted faster at higher priority units or previously owned DOE properties. Therefore, unless LANL can provide RFI report schedules which can reflect that work is being expedited at high priority areas by August 5, 1994, EPA will set schedules for RFI deliverables and will revise Module VIII of the RCRA permit accordingly. In addition, no RFI work plans will be approved until issues relating to schedules are resolved.

Should you have any questions, please contact Barbara Driscoll at (214) 655-7441.

Sincerely,



William K. Honker, P.E. Chief,  
RCRA Permits Branch

cc: Mr. Benito Garcia, Bureau Chief  
Hazardous Waste and Radioactive Bureau  
New Mexico Environment Department

Mr. Jorg Jansen, Program Manager  
Environmental Restoration Program  
Los Alamos National Laboratory, M992