

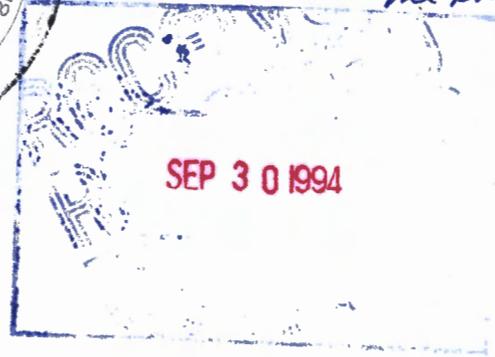


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

SEP 2 2 1994

*Teri Davis -
Pls keep on file
Bando
If you have
comments - pls let
me know*



SEP 3 0 1994

XIV

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

Re: Installation Work Plan Requirements
Los Alamos National Laboratory (NM0890010515)

Dear Mr. Taylor:

Following discussions with the Department of Energy (DOE) and Los Alamos National Laboratory (LANL) during the week of August 15-19, 1994, the Environmental Protection Agency (EPA) has reviewed revision three of the Installation Work Plan (IWP) for required and pertinent information. Requirements for the IWP are listed in Module VIII the Hazardous and Solid Waste Amendments (HSWA) portion of the Resource Conservation and Recovery Act (RCRA) permit. Module VIII requirements as outlined under Section I (1 and 2) and Section Q, Tasks I and II, include a description of the facility, a data collection quality assurance plan, data management plan, health and safety plan, community relations plan, and a project management plan (technical approach, schedules, budget, and key projects).

EPA has reviewed the above requirements and the comments submitted by the New Mexico Environment Department, and has the following recommendations for improvement of the IWP:

1. All sections could be incorporated into one volume, and only updated information should be submitted annually.
2. Chapters 3, 4 and Annex I could be replaced by the information in the action plan once this in an approved document by DOE.
3. Appendix A, Technical Area Descriptions, could be combined with Chapter 2, Installation Description.
4. Appendix B, Maps of Wetlands, Drainages and Well Locations, and D, Geochemical Studies of Soils and Bandalier Tuff might be included in Chapter 2, Installation Description.

LANL HSWA GEN/PERMIT
Permit



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5. Appendices C, Cover and Stabilization Pilot Studies; E, Quality Control Charter; G, Observation Approach to Environmental Restoration; H, Statistical Sampling and Data Analysis for Environmental Restoration; and Appendix I, Decision Strategies for Environmental Restoration do not need to be included in this document.

Portions of the IWP which have already been approved such as Appendices J through O only need to be updated for any changes which have occurred in the program or new information. EPA would like to see this document become streamlined with only minor modifications each year.

Sincerely,



Barbara Driscoll
NM/FF Section

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

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