

AS A LANL 5/11/97

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MEMORANDUM

To: Benito Garcia, Chief
 Hazardous and Radioactive Materials Bureau

Thru: Robert S. ("Stu") Dinwiddie, Manager RCRA Permits Management Program

Thru: Teri D. Davis, DOE Team Supervisor

Thru: John Kieling, LANL Facility Manager

From: Kim T. Hill, Environmental Engineer

Subject: HRMB's Strategy for the Systematic Evaluation and Prioritization of Potential Release Sites at Los Alamos National Laboratory

Date: Mar 18, 1997

Two closely inter-related issues need immediate resolution regarding the Los Alamos National Laboratory RCRA Operating Permit (HSWA Module VIII): development of an enforceable schedule of compliance (SOC) and prioritization of Corrective Action activities. Each year HRMB negotiates with EPA for grant commitments which are subject to change due to DOE/LANL's budget or schedule. Currently, DOE/LANL does not have a SOC reflective of the activities on-going at LANL (see letter from Jansen/Taylor to Garcia dated February 10, 1997). DOE/LANL's current SOC, 10-year plan, and HRMB's priorities must be aligned. The DOE Team plans to resolve these issues by performing the following step-wise activities:

1. Request from LANL the information necessary to qualitatively evaluate the threat posed to human health and the environment on a PRS-by-PRS basis [letter currently in draft form]
2. Based on the review of the requested information, assign a unified NMED (non-Bureau or -Program specific) priority level to each PRS and identify those AOCs which should be added to the Permit [projected for completion by the end of June 1997]
3. Initiate a Class I permit modification to add those AOCs to the HSWA Module [projected for completion in June 1997]
4. Review LANL's most current Baseline and identify the differences from the NMED priorities [projected for completion in August 1997]
5. Meet with LANL to discuss the differences between LANL's Baseline and NMED's priorities [projected to occur in August 1997]
6. Initiate a Class III permit modification to incorporate the revised Schedule of Compliance and the use of the Progress Tracking System monthly report in lieu of the Quarterly Monitoring report [projected for completion in October 1997]

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7. Review DOE Albuquerque Field Office's 10-year plan, identify the differences between the SOC and the 10-year plan, and work with DOE Albuquerque Office to assure their alignment [projected for October 1997]
8. Review LANL's SOC presented in the Installation Workplan to assure that LANL's work schedule is truly reflected in the annual baseline [November 1997]
9. Begin planning HRMB's FY98 activities as determined by LANL's SOC¹

If you have any comments or questions regarding the process envisioned and in progress by the DOE Team, please let me know.

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¹ For FY98 activities, HRMB will only work on those submittals already in-house.