



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

*Revised*

*LANL a3*

JAN 6 1993

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JAN 19 1993

NM ENVIRONMENT DEPARTMENT  
OFFICE OF THE SECRETARY

Jerry L. Bellows  
Area Manager  
Department of Energy  
Los Alamos Area Office  
Los Alamos, New Mexico 87544

*Need to discuss w/ you*  
*Barbara*  
*Driscoll*

Re: RFI Workplan for OU 1071  
Los Alamos National Laboratory  
NM0890010515

Dear Mr. Bellows:

The Environmental Protection Agency (EPA) hereby approves your RCRA Facility Investigation (RFI) Workplan for Operable Unit 1071 (OU 1071). The approved RFI Workplan consists of the RFI Workplan dated May 20, 1992, and the November 16, 1992 Notice of Deficiency Response.

You shall immediately initiate the implementation of this approved RFI Workplan, according to the schedule contained in the Workplan. If you have any questions, please contact Barbara Driscoll of my staff at (214) 655-6770.

Sincerely,

Allyn M. Davis, Director  
Hazardous Waste Management Division (6H)

cc: Kathleen Sisneros, NMED ✓  
Al Tiedman, LANL

*TL*



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## MODIFICATIONS

1. In the Notice of Deficiency Response for OU 1078 dated October 30, 1992, the Department of Energy (DOE)/Los Alamos National Laboratory (LANL) continues to insist that should current RFI activities find no contamination in some of the areas within the Townsite which were previously remediated then this information will be used to infer that other areas in the Townsite were also remediated adequately; therefore, no further action (NFA) will be required at these SWMUs (DOE Response to NOD on the OU 1078 RFI Work Plan, responses 1 and 5). EPA contended in the original OU 1078 NOD that this approach was unacceptable, and EPA has reiterated this viewpoint in several meetings with DOE/LANL. All areas deemed "inaccessible" by LANL should be presented to and reviewed by EPA on a case-by-case basis prior to any NFA consideration.

The Phase I Report/Work plan which is due in January, 1993 will be reviewed with the potential exposure from each SWMU taken into account. Any additional SWMUs which are not addressed in this report or the original work plan shall then be reviewed as indicated for potential exposure, and a determination will be made whether or not sampling will be required.

2. Response to Table 1.8-2 page 1-29

The response given by LANL does not respond to the comment made by EPA which is that the criteria used for a recommendation of NFA at Decision Point 1 is not acceptable. Because a SWMU is physically situated such that a release to the environment and exposure to receptors is highly unlikely, does not automatically lead to a NFA decision. The decision table should be modified.