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M E M O R A N D U M

TO: Barbara Hoditschek, Program Manager, NMED/RCRA Permits
Ron Kern, Program Manager, NMED/RCRA Technical Program

THROUGH: ^{hoz} Bruce Swanton, Program Manager DOE/EM Oversight
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FROM: Mary Perkins, NMED AIP/LANL

DATE: September 16, 1994

SUBJECT: Review of LANL's Operable Unit 1085 RFI Work Plan,
Submitted May 1994.

The Hazardous and Radioactive Materials Bureau (HRMB) Agreement in Principle (AIP) staff have completed the review of the operable unit (OU) 1085 RCRA facility investigation (RFI) work plan. This memo details the comments stemming from the review. For clarity, the memo contains numbered items listing comments that are keyed to a specific chapter/section number, bullet, table or figure in the RFI as well as to the page number e.g., Item 2. (4.4.4.4, b5, T. 4-4-4, **Fig.** 4-4-4, pg. 4-17). The AIP program is submitting these comments and technical recommendations to the HRMB's RCRA Permits and Technical Compliance Programs due to eventual New Mexico Hazardous and Solid Waste Act (HSWA) authorization.

Item

1. **General Comment** The decision not to include residential use as a potential future land use scenario should not be made without adequate stakeholders' input. The residential scenario should be assumed as the sole future land use option until such public input has been obtained.
2. **General Comment** It is understood that any area of concern (AOC), or solid waste management unit (SWMU) scheduled for voluntary corrective action (VCA) is done at Los Alamos National Laboratory's (LANL) own risk. Under HSWA authority, the EPA or the state of New Mexico could revisit all potential release sites (PRS) for evaluation at any time in the future. Review of proposed VCA's by NMED/AIP staff may help in the designing and completing of adequate verification sampling and may help in communicating the objectives and results of the VCA to NMED regulatory programs thereby reducing the possibility of revisiting these sites in the future.



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