



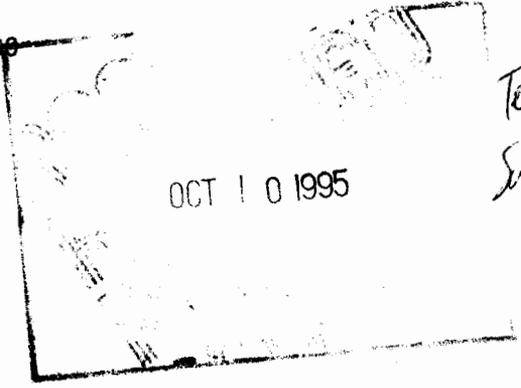
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

OCT 04 1995

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Teri ✓
Susan ✓



Mr. Theodore J. Taylor
Program Manager
Department of Energy
Los Alamos National Laboratory
Los Alamos, NM 87544

Re: Request for extension of RFI Report for TA 15
Los Alamos National Laboratory (NM0890010515)

Dear Mr. Taylor:

The Environmental Protection Agency (EPA) has reviewed your response letter dated September 15, 1995, providing additional information regarding your extension request for a report at Technical Area 15 from July 30, 1995 to December 29, 1995. EPA has the following comments in regards to the length of this extension, and to the inefficiencies in your program demonstrated by this request:

1. Analytical data was received by Los Alamos National Laboratory (LANL) in December 1994. Review of data was completed April 1995, and data was uploaded to FIMAD in June 1995. The process from sample collection to uploading in FIMAD required almost a year. In contrast, data collected by EPA contractors is typically received, validated and incorporated into reports in less than ninety days (approximately three months). LANL is requiring over six months from receipt of validated data from a laboratory to revalidate and upload into a computer database.
2. Under the requirements of Module VIII, Task V Part D of your RCRA permit, LANL is required to submit RFI Reports within sixty calendar days after the completion of either phase of the RFI. For LANL, EPA has agreed to completion of data validation as being representative of completion of phase of RFI investigation. According to your letter all data was accessible as of June 23, 1995 and sixty days from that would mean an RFI report was due to EPA on August 22, 1995. Considering the RFI report was due July 30, 1995, LANL has requested an extension of six months or approximately 180-days which is three times the amount required in your RCRA permit.

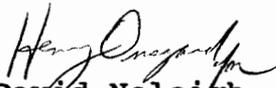
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EPA feels this example points out two areas where LANL needs to improve efficiency and productivity. First input of analytical data into a computer database should not require six months, and writing an RFI report addressing ten solid waste management units should not require seven months from receipt of data. LANL should have been capable of submitting an RFI report in the March/April 1995 timeframe based on receipt of data in December 1994.

EPA is granting an extension on this RFI report until November 1, 1995. If you should have any questions, please feel free to contact Ms. Barbara Driscoll at (214) 665-7441.

Sincerely,


David Neleigh, Chief
New Mexico - Federal
Facilities Section

cc: Mr. Benito Garcia
New Mexico Environment Department
Mr. Jorg Jansen
Los Alamos National Laboratory