



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

TA21

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October 30, 1991

RECEIVED

NOV 4 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

NM ENVIRONMENTAL QUALITY DIVISION
OFFICE OF THE SECRETARY

Mr. Jerry Bellows
Area Manager
Department of Energy
Los Alamos Area Office
528 35th Street
Los Alamos, New Mexico 87544

Dear Mr. Bellows:

We have completed a review of your RCRA Facility Investigation (RFI) Workplan dated May 1991, and have determined the Workplan to be deficient. A list of deficiencies and comments is enclosed for your review.

In addition, we understand that the RFI Workplans for the off-site Solid Waste Management Units (SWMU's) will not be completed until May 1992. We recommend that Los Alamos National Laboratory initiate an accelerated schedule for the Workplans pertaining to the off-site SWMU's (see the enclosed comment regarding this issue).

You shall have 30 days from the receipt of this letter to submit modified Workplans which address the enclosed deficiencies. If these modified Workplans are not approved, we may make further modifications as required.

If you have any questions, please contact me or have your staff contact Rich Mayer of my staff at (214) 655-6775.

Sincerely yours,

Handwritten signature: WK Honker

William K. Honker
Chief
RCRA Permits Branch

Enclosure

cc: Kathy Sisneros, NMED
Dr. Siegfried Hecker, LANL



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LANL RFI WORKPLAN DEFICIENCIES

Chapter 1; Page 1-8 thru 1-9: LANL needs to increase the number of SWMU's being investigated during the end of 1991 and 1992 or clarify in this chapter that during the characterization/initial investigations a certain number of SWMU's will be investigated.

Chapter 1; Page 1-10: For each technical Memo, LANL needs to state the estimated number/range of SWMU's to be addressed. In addition, LANL needs to include an estimated number/range of Corrective Measure Studies initiated in each technical memo, if appropriate.

GENERAL COMMENT

EPA's understanding is that LANL has done a detailed scientific risk/SWMU environmental priority assessment which concluded that SWMU's located in Technical Area 21 were the number one environmental priority. Even though this scientific study supported the investigation of TA 21 SWMU's first, EPA recommends that the investigation of the off-site SWMU's be accelerated from the current schedule. During the permitting process, the Agency was repeatedly told by DOE/LANL personnel that SWMU's located off-site would be investigated first. Since EPA was assured that off-site SWMU's would be investigated first, no detailed permit requirement was included. However, since the first RFI Workplan (May 1990) does not include any off-site SWMU's, EPA is greatly concerned, and feels that the investigation of the off-site SWMU's should be accelerated.