

10/1/89

NM 0890010515

III

EPA Comments on Los Alamos  
National Laboratory (POE)  
5 Year plan October 89 Draft

The plan appears well organized and thorough, however some comments need to be made.

P.3 The last sentence states that "updated task scopes and (RCRA permit) schedules will be **negotiated...**". It is important to clarify that all schedules outlined in the final HSWA permit will be enforced. Justifiable extensions of up to 120 days may be granted for any deadline, however any other changes which EPA agrees are necessary to the permit must be processed as major modifications to the permit, with full public participation.

This document specifies an estimated six years for completion of RFI/CMS before initiation of corrective measures. As the RFI progresses some logical splitting of tasks is anticipated, therefore some corrective measures should commence in a shorter timeframe.

The current PCB/mixed waste landfill (SWMU 54.003) may require upgrading, therefore more funds may be necessary.

It is important to note that the even increased levels of funding specified in Appendix B over Appendix A may fall short of actual funding need. EPA will not be modifying the permit to adjust to the availability of funding.

2345 TA 54  
CERCLA

