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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

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RECEIVED

September 28, 1995

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Mr. Theodore J. Taylor  
Program Manager  
Department of Energy  
Los Alamos Area Office  
Los Alamos, NM 87544

LARS F. SOHOLT

Re: Modification to Phase I Material Disposal Area G  
Los Alamos National Laboratory (NM0890010515)

Dear Mr. Taylor:

The Environmental Protection Agency (EPA) has reviewed your request for a modification to the Phase I Material Disposal Area (MDA) G Drilling Plan in Field Unit 5 dated September 27, 1995. Enclosed is a list of changes to this modification request with which Los Alamos National Laboratory (LANL) shall comply. In addition, because no fieldwork or RCRA Facility Investigation (RFI) report schedule was submitted with this modification request, EPA is requiring that the RFI report be submitted on July 1, 1996. Because LANL indicates that drilling will begin on October 2, 1995, this schedule should be easily met.

EPA would like to address the timing of the modification request for MDA G (the MOD) by LANL. EPA and LANL met on July 7, 1995, to discuss the MOD in a very general manner. At this meeting, EPA indicated that a written request should be submitted, and that EPA had some concerns regarding the sampling intervals for the boreholes. With the knowledge that LANL wanted to initiate drilling in early October 1995, EPA contacted LANL several times concerning submittal of the MOD. EPA also discussed the fact that the MOD had not been submitted in a September 18, 1995 meeting with LANL, and was at that time promised the MOD by the end of the week. Following a phone call by EPA, the MOD was finally faxed to EPA on September 27, 1995 only a few days prior to initiation of field work.



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The MOD is three pages of written text and three pages of figures. It does not appear that the delay in receiving this request was due to the complexity of the document. In the future, such request should be submitted in a timely manner and preferably following any discussions of the modification with EPA.

Should you have any questions, please feel free to contact Ms. Barbara Driscoll at (214) 665-7441.

Sincerely,

  
David W. Neefeigh, Chief  
New Mexico - Federal  
Facilities Section

Enclosure

cc: Mr. Benito Garcia  
New Mexico Environment Department  
Mr. Jorg Jansen ✓  
Los Alamos National Laboratory, MS M992  
Mr. Rich Sena  
Department of Energy

**LIST OF MODIFICATIONS**  
**MDA G**  
**Los Alamos National Laboratory**

1. For all coreholes: LANL shall collect a core sample **every 10 feet** rather than at each 20-foot interval for the analysis of Target Analyte List (TAL) metals plus cyanide, Target Compound List (TCL) volatile organic compound, semi-volatile organic compounds, polychlorinated biphenyls/pesticides with Level III data package.
2. By October 27, 1995, LANL shall submit to EPA a cross-section figure of each angled borehole and the relation of that borehole to the pit under which the borehole is angled.
3. Within thirty days of receipt of preliminary analytical basis, LANL shall meet with EPA and NMED to determine which boreholes will be converted to vapor monitoring wells.