

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
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**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

December 20, 2000

Dr. John Browne, Director  
Los Alamos National Laboratory  
P.O. Box 1663, Mail Stop A100  
Los Alamos, New Mexico 87545

Mr. Theodore Taylor, Project Manager  
Los Alamos Area Office Department of Energy  
528 35<sup>th</sup> Street, Mail Stop A316  
Los Alamos, New Mexico 87544

**RE: RESPONSE TO MODIFICATION TO THE REGULATORY APPROACH FOR  
POTENTIAL RELEASE SITES (PRSs) 73-001(a-d) AND 73-004(d), AIRPORT  
LANDFILL AREAS  
LOS ALAMOS NATIONAL LABORATORY  
EPA ID# NM0890010515  
HWB-LANL-00-015**

Dear Dr. Browne and Mr. Taylor:

The New Mexico Environment Department (NMED) Hazardous Waste Bureau (HWB) has reviewed the 73-001(a-d) and 73-004(d) Modification to the Regulatory Approach letter (ER2000-0582) dated October 16, 2000 documenting a modification to the current regulatory approach for the airport landfill potential release sites (PRSs). HWB concurs with the proposed modification but has the following comment.

The Airport Landfill high performing team (HPT) agreed to the initial approach, utilizing a phased Voluntary Corrective Measure (VCM), in March 2000. The phased approach would address the drainages and the airport landfill investigation and cover design as "phases" of the VCM. The modification involves using an Interim Measure (IM) to complete cleanup of drainages associated with landfill activities. Completion of the landfill investigation and subsequent cover design and construction will be completed as a VCM. HWB recognizes that accelerated cleanup of the drainages will result by changing the regulatory approach. Although HWB concurs with the modification, HWB will not allow the drainages to be formally separated from the airport landfill. Investigation and cleanup of the drainages and the landfill will be completed separately; however, the drainage and landfill areas will not be split into two sites. A



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HSWA LANL 1/1071/73 73-001(a-d), 73-004(d)

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formal IM plan and report must be submitted to HWB. In addition, all IM activities and results shall be submitted to HWB for review and approval in the final VCM report for the entire site.

HWB recognizes the importance of the role of the HPT in decision-making, planning, dissemination of information to the general public, and project coordination for the airport landfill project. In addition, HWB also recognizes the proposed modification will not affect other planned activities or the ultimate goal of the project. Should you have any questions or concerns, please contact Vickie Maranville at (505) 827-1558 ext. 1044.

Sincerely,



John Young  
LANL Corrective Action Project Leader  
Permits Management Program

JRY:vm

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File: Reading and HSWA LANL 1/1071/73/73-001(a-d),73-004(d)