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ENVIRONMENT DEPARTMENT

DOE/LANL Oversight Program  
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Los Alamos, New Mexico 87545

JUDITH M. ESPINOSA  
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August 16, 1993

Dave Bradbury  
EM-13  
MS M992

TX

Dear Mr. Bradbury:

The following comments may clarify the AIP recommendations referred to in the Review Sheet. We realize that the Site Ranking System serves as a subjective questionnaire and is only one element leading to a final determination on site prioritization, however, in order to most effectively incorporate "best estimates of contaminant and site characteristics" the following comments/suggestions should be incorporated.

Comment #	M/O	Comment/Suggestion
#5	M	What are expected or known concentrations of source terms associated with the unit, based on archival information? (v.high, moderately high, low, none)
#6	M	Add Question A6: What is the probability that the unit could have contributed/will contribute to the presence of toxic or radiological contaminants identified in surface water, ground water, or soils downgradient of the area? (high, moderately high, low, none)
		<b>Questions B3 and B4 do not address important physical or geochemical characteristics of the site itself.</b>
#7	M	Add Question B8: What is the probability of existing factors which could facilitate contaminant migration from the site such as faults, fractures, perched water, etc? (high, moderate possibility, remote possibility, none)?

**Questions B2, B4, and B7 do not address physical characteristics of the migration pathways.**

LANL HSW 660000 18

TC



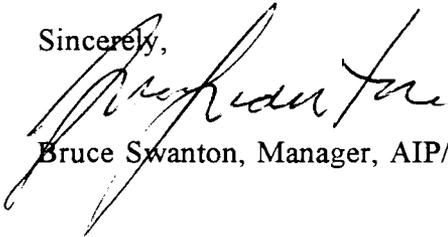
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With respect to the Review Sheet our comments are purely technical and non-regulatory in nature; however, we do not believe the Site Ranking System will provide a reasonable basis for prioritization without the inclusion of questions A5, A6, and B8.

If you have any questions, feel free to call me at 665-7124.

Sincerely,



Bruce Swanton, Manager, AIP/LANL

Enclosure: Site Ranking Review Sheet

cc:

Barbara Hoditschek, Manager, RCRA Permits  
Steve Alexander, Manager, RCRA Technical Compliance  
Benito Garcia, Chief, HRMB  
Neil Weber, Chief, AIP Program  
File, AIP/LANL  
File, LANL Red 93

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**Los Alamos National Laboratory Environmental Restoration Program**

**REVIEW SHEET**

Part I (To be filled out by ER Program Office) Date August 3, 1993

Title LANL/SNL Site Ranking System ID No. \_\_\_\_\_ Rev. \_\_\_\_\_

Reviewer's Name (print): Bruce Swanton Group: NMED MS: \_\_\_\_\_

Comments due by \_\_\_\_\_ (Date) Return comments to \_\_\_\_\_ MS \_\_\_\_\_

Refer questions to \_\_\_\_\_ Phone \_\_\_\_\_

Part II (Reviewer completes)

Received On: 7-30-93 Review Completed On: \_\_\_\_\_ (Date) Signature: \_\_\_\_\_ Phone: \_\_\_\_\_

(Place an "X" in box if resolution of mandatory comments agreed to.)

No.	Location (Page, para- graph, line)	Reviewer's Comments/Suggestions [Mandatory (M) or Optional (O)]		Preparer's Proposed Revision/Resolution [Accept (A) or reject (R) Reviewer's comments/suggestions]	
		M/O		A/R	
1	A3		"Surface water" - need better definition of surface water (e.g., perennial vs. ephemeral).	R	O.K. as it stands in revision.
2	A2		"Usable water" - does this include perched alluvial water or water with ecological uses such as the support of wildlife (e.g., endangered Jemez salamander).	R	Term deleted in revision.
3	A2, A3, A4		"Sufficient quantities" - define quantitatively in terms of Screening Actions Levels.	A	This will be addressed in the Users' Guide.
4	B6		"Sensitive environment" - is this directed at fragile ecosystems like canyon drainages?	R	Reworded for clarification in revision.
5			Add question (A5): What are the expected or known concentrations of rad and/or hazardous wastes in the waste stream associated with the unit? (Very high, moderately high, low, none)	R	Perhaps change to "source terms;" we do not deal with "waste streams."

**Los Alamos National Laboratory Environmental Restoration Program**

**REVIEW SHEET**

(Continued)

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Title: LANL/SNL Site Ranking System

Reviewer: Bruce Swanton (NMED)

No.	Location (Page, paragraph, line)	Reviewer's Comments/Suggestions [Mandatory (M) or optional (O)]	Preparer's Proposed Revision/Resolution [Accept (A) or reject (R) Reviewer's comments/suggestions]	
6		<p align="center"><u>M/O</u></p> <p>Add question (A6): What is the probability that the unit could have contributed to the presence of toxic or radiological contaminants identified in surface water, ground water or soils downgradient of the area? (High, moderately high, low, none)</p>	<p align="center"><u>A/R</u></p> <p>R</p>	<p>This is already covered indirectly with regard to distance in questions B3 and B4.</p>
7		<p>Add question (B8): What is the probability of existing factors which could facilitate contaminant migration from the area such as faults, fractures, perched water etc.? (High, moderate possibility, remote possibility, none)</p>	<p>R</p>	<p>We believe that the issue of contaminant transport/migration is adequately addressed in questions B2, B4, and B7.</p>