



LANL
ASWA
general
9

State of New Mexico
ENVIRONMENT DEPARTMENT
DOE OVERSIGHT BUREAU
P.O. Box 1663, MS/J-993
Los Alamos, New Mexico 87545

Ken G
Barbara
file
Teri
St...

GARY E. JOHNSON
GOVERNOR

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

October 6, 1995

Ted Taylor
Department of Energy
Los Alamos Area Office
MS-A316
Los Alamos, NM 87545

Subject: Request for delineation of Environmental Restoration sites
in or near watercourses

Dear Mr. Taylor:

The New Mexico Environment Department, Department of Energy Oversight Bureau (NMED DOE OB) needs more information to assess Potential Release Sites (PRS), Solid Waste Management Units (SWMUs), Voluntary Corrective Action (VCA) and Expedited Cleanup (EC) sites for potential impacts to surface water quality. To fulfill this need the NMED DOE OB is requesting a map which indicates all of the above sites that are located in natural watercourses or where there is a reasonable probability that Constituents of Concern (COCs) will be moved into a natural watercourse by leaching or otherwise. In addition we are requesting a listing of COCs and their concentration found at each site delineated on the map.

It is the understanding of NMED DOE OB that a comprehensive, technically defensible, Lab-wide site prioritization scheme relating to surface water quality impacts of Environmental Restoration (ER) sites is not in place at this time. A prioritization scheme which incorporates the proximity of a site to a watercourse, the extent of contamination, and the likelihood of contaminant mobilization and transport from stormwater should be developed. Best Management Practices (BMPs) should then be put in place and maintained on a priority basis to mitigate the spread of these contaminants until final remediation of the site is accomplished.

LANL PWA 6/11/95



12667

2

Page 2
Ted Taylor
October 6, 1995

It is our understanding that funding for BMP incorporation into the ER, ~~VER~~ and EC investigation process has not been provided for. Adequate funding for interim measures should be obtained and applied to BMPs. Funds expended now preventing the spread of contamination will save money in the future when actual remediation commences, and mitigate transport of contaminants from laboratory property.

DOE OB requests that two copies of these maps and supporting information be provided to the DOE OB. One copy of these maps and supporting information will be delivered to the Surface Water Quality Bureau (SWQB). These maps will be used to prioritize sites for the implementation of storm water Best Management Practices (BMPs) and to track mitigation progress.

Watercourse protection is addressed in New Mexico Water Quality Control Commission Regulations in Section 2-200; 2-201.

"DISPOSAL OF REFUSE-No person shall dispose of any refuse in a natural watercourse or in a manner where there is a reasonable probability that the refuse will be moved into a natural watercourse by leaching or otherwise. Solids diverted from the stream and returned thereto are not subject to abatement under this section".

Historical release sites should be addressed in the same manner as spills. They should be reported to the SWQB and mitigation measures need to be addressed to prevent the spread of contamination until final clean-up.

If you have any further questions please do not hesitate to call me at 672-0459 to discuss this matter.

Sincerely,



Steve Yanicak
NMED/DOE/OB, POC

SY: rfs:hd

cc: Neil Weber, Chief, NMED/AIP Bureau
Jim Piatt, NMED, Chief, SWQB
Steve Rae, Group Leader, ES&H-18, MS/K497
Benito Garcia, NMED, Chief, HRMB
Joseph Vozella, AAMEP, LAEO, MS-A316
Ivan Trujillo, DOE\AIP\POC, MS-A316
Jorg Jansen, EM/ER/D&D, MS-M992