

~~CONFIDENTIAL~~ 5/9/96

MEMORANDUM

Draft

TO: Benito Garcia, HRMB Bureau Chief

FROM: Teri Davis, RCRA Technical Compliance Program

THROUGH: Ronald A. Kern, Technical Compliance Program Manager

DATE: May 10, 1996

SUBJECT: **Recommendations on prioritization of Solid Waste Management Units at Los Alamos National Laboratory**

On May 6, 1995, LANL submitted a package of information containing DOE/LANL's prioritization of SWMUs based on the Site Ranking system and various modifying factors. DOE/LANL requested that NMED provide input to DOE/LANL's prioritization by May 14, 1996. DOE/LANL's submittal (5/6/96) is lacking pertinent information for NMED to determine priorities at individual SWMUs or SWMU aggregates. The following information should be submitted in column form to be reviewed with PRS location description and the suggested priority: 1) one column which briefly describes the current project status (e.g. Phase 1, EC, VCA, etc.); 2) release information (data obtained from Phase 1 Reports, SWMU Reports, etc.) should be briefly described (has a release occurred above action levels and does the potential for migration exist); and 3) projected status of SWMU (which Phase 1 PRS will be recommend for VCA, EC, NFA, etc.). Without this information NMED recommendations are meaningless.

On March 28, 1996, NMED and EPA met and discussed LANL's FY96 through FY98 schedules for field work at high priority sites. EPA has provided comments based on the March 28th meeting on revised priorities for deliverables/field work. The following recommendations reflect concerns conveyed in EPA's letter to HRMB (received electronically 4/ /96) as well as additional HRMB concerns on the proposed prioritization. NMED DOE OB reviewed DOE/LANL's 5/6/96 submittal and provided general draft comments (see attachment 1). The following recommendations are HRMB priorities which currently differ from DOE/LANL as proposed within LANL's May 6, 1995 submittal. The following recommendations should not be construed as final decision because of the lack of current information necessary to conduct an adequate assessment.



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Field Unit One

<u>Aggregate Description</u>	<u>PRS</u>	<u>LANL Priority</u>	<u>NMED Priority</u>	<u>Comments</u>
TA-0 [Grp 0-6] Bandelier Nat'l	all	H	L	work already done
TA-0 Zia Motor [entire Agg.]	all	H	L	work already done
TA-21 [Agg 12.5] <i>BOXINGS SUBSCRIPT</i>	MDA T,U <i>OTHERS IN AGGREG ARE NOT NEC. H PRIORITY</i>	M	H	releases have been documented; potential for release is high. <i>(P. 7)</i> <i>- SPLIT AGGREGATE INTO 2: H + M PRIORITIES</i>

Field Unit Two

<u>Aggregate Description</u>	<u>PRS</u>	<u>LANL Priority</u>	<u>NMED Priority</u>	<u>Comments</u>
TA-53 lagoon	53-002(b)	M	H	operating permit/ <i>CLOSURE</i>
TA-15	<i>15-004(f)</i>			<i>OPER. PERMIT (CLOSURE)</i>
TA-18				<i>GW CONCERNS</i>
TA-14	<i>*14-001(g)</i>			<i>LAST INTERIM STATUS - MUST SUBMIT CLOSURE PLAN</i>
	<i>*15-003 (INTERIM)</i>			<i>CB/OD - HAZ WASTE PHEMEX - CB/OD (MIXED W.)</i>

* SHOULD BUDGET FOR CLOSURE PLAN

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Field Unit Three

<u>Aggregate Description</u>	<u>PRS</u>	<u>LANL Priority</u>	<u>NMED Priority</u>	<u>Comments</u>
TA-16 5094 <small>ABC VE FIDA P</small>	16-010(b-f) ^①	M	H	BURNING GROUND, MIGRATORY POT. TO CANYON DE VALLE (p. 6) LANDFILL (p. 6) contaminated soil } AIP data & concerns contaminated soil } possibly split out from aggregate MDX-R OUTFALL (AIP RECOMM) drop tower/surface transport (AIP RECOMM) Ba-Nitrate (98% WORK/REP DONE)
	16-016(a,b)*	M	H	
	16-035 (p. 5)	M	H	
	16-036 (p. 5)	M	H	
	16-019	M	H	
	(5736)- 16-029(j)	M	H	
	(5094) 11-004(a-f)	M	H	
	16-016(c)			

*(b) CLEANED & NFA (VCA)

① ACTIVE SITES, PERMITTING & MIGRATORY POTENTIAL TO CANYON DE VALLE

Field Unit Four

<u>Aggregate Description</u>	<u>PRS</u>	<u>LANL Priority</u>	<u>NMED Priority</u>	<u>Comments</u>
DESCENDING PRIORITY Los Alamos/Pueblo	C-0-00(5-6)	H	H	
Mortandad	C-0-008	H	H	
Pajarito/Threemile /Twomile	C-0-0(10-12)	H	H	
Cañada del Buey /Sandia	C-0-00(7,9)	H	H	
Gauje/Bayo/Barrancas /Rendija	C-0-00(1-4)	M	H	
Water /Cañon de Valle	C-0-0(14,16)	M	H	
Ancho/Indio /Chaquehui	C-0-0(17-19)	H	H	
Potrillo/Fence	C-0-013	H	H	
TA-5 Agg B (p. 5)	5-002	M	H	CANYON-SIDE DISPOSAL AIP COMMENT
MDA AB		F2	H	

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Field Unit Five

<u>Aggregate Description</u>	<u>PRS</u>	<u>LANL Priority</u>	<u>NMED Priority</u>	<u>Comments</u>
TA-50 Bld 1	50-001(a)	M	H	known releases <i>MIXED W. PLUME</i> <i>RSS. DELAY DUE TO TERTIARY FACILITY</i>
TA-50	50-006(d)	H	→ H <i>WEEK BEING DONE 50%</i>	in activity data sheets, this SWMU is listed in activities beyond FY98; need clarification. <i>REFIN PROGRESS;</i> <i>GWPS CALLED IN DISCH. PLAN</i>
TA-49 MDA AB <i>SHAFTS W/ ASPHALT CAP</i>	49-001(a-g)	M	H	releases to regional aquifer suggested from data <i>DT-5A, 9, 10 - HAVE REL. HIGH FRACTURES CONTAINS (300-600 FT)</i>

cc: Barbara Hoditschek, Permitting Program Manager
 Robert Dinwiddie, Permitting Program
 Steve Yanicak, NMED DOE OB
 Barbara Driscoll, EPA Region VI
 FILE LANL 96

Attachment 1.

10 May 1996

DRAFT

Mr. Court Fesmire, LAAO AIP
Point of Contact
Department of Energy
Los Alamos Area Office
MS A316
Los Alamos, NM 87544

SUBJECT: Recommendations concerning the prioritization of Solid Waste Management Units at Los Alamos National Laboratory, New Mexico

Dear Mr. Fesmire:

As part of DOE OB's oversight of the Environmental Restoration Project, it is recommended that LANL direct their efforts (i.e., cleanup, stabilization, etc.) at SWMUs that contain high concentrations of surficial contaminants, both radionuclides and non-radionuclides, that are subject to transport during surface-water run-off events. For example, preliminary field data obtained at E-F firing site (TA-15) show lead at 335 ppm and uranium at 2291 ppm in a small drainage located south of the site (Anonymus, 1994). The drainage extends to Potrillo Canyon. Hence, it is probable that for the past 49 years primary or fixed contaminants have been transported into Portillo Canyon. One could define this process as natural remediation at the expense of the environment. Other sites would include SWMU 3-056(c), which contain PCBs as high as 33,000 ppm that may have undergone re-mobilized by erosional processes and deposited at some unknown distance downstream, and SWMU 1-....., located on the south facing hillside of Los Alamos Canyon, contains plutonium-238/240 at pCi/G, mercury at ppm..... any other constituents? of which may be entering Los Alamos Canyon and ultimately the Rio Grande. If there are any questions concerning this matter please contact me at 672-0448.

Sincerely,

Steve Yanicak, NMED, DOE OB, LANL POC
New Mexico Environment Department

SY:mrd