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MEMORANDUM

TO: Benito J. Garcia, Bureau Chief

FROM: Teri Davis, RCRA Technical Compliance Program

THROUGH: *RAC* Ronald A. Kern, Technical Compliance Program Manager

DATE: June 6, 1996

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

On May 6, 1996, Los Alamos National Laboratory (LANL) submitted a package of information containing Department of Energy (DOE)/LANL's prioritization of Solid Waste Management Units (SWMU) based on the Site Ranking System and various modifying factors. DOE/LANL's prioritization package is lacking pertinent information for NMED to determine priorities at individual SMWUs or SWMU aggregates.

The potential for release from a SWMU should be indicated and evaluated for migration potential at each site. The release information to be provided should be very similar to the data provided for NMED Surface Water Quality Bureau (SWQB) as requested by NMED on February 8, 1996. This type of information should be integrated into DOE/LANL's prioritization package for NMED HRMB to provide meaningful input to DOE/LANL's prioritization scheme.

The following recommendations are HRMB's priorities which currently differ from DOE/LANL's as proposed within LANL's May 6, 1996 prioritization package. The following recommendations should not be construed as a final decision because of the lack of current information necessary to conduct an adequate assessment. On March 28, 1996, NMED and EPA met and discussed LANL's FY96 through FY98 schedules for field work at high priority sites. EPA subsequently provided comments to HRMB based on revised priorities for deliverables/field work. HRMB's recommendations (see attachment A) also



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Benito Garcia
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reflect concerns conveyed by EPA. The DOE Oversight Bureau (OB) of NMED also reviewed DOE/LANL's prioritization package and provided general comments which are reflected within HRMB's recommendations.

The following recommendations are HRMB's priorities which currently differ from DOE/LANL's as proposed within LANL's May 6, 1996 prioritization package. The following recommendations should not be construed as a final decision because of the lack of current information necessary to conduct an adequate assessment:

Attachment A

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 complete
TA-0 Zia Motor [entire Agg.]	all	H	L	work already complete
TA-21 [Agg 12.5]	MDA T,U	M	H	releases have been documented; potential for release is high.

Field Unit Two

<u>Aggregate Description</u>	<u>PRS</u>	<u>LANL Priority</u>	<u>NMED Priority</u>	<u>Comments</u>
TA-53	53-002(b)	M	H	operating permit (lagoons)

Field Unit Three

Aggregate Description	PRS	LANL Priority	NMED Priority	Comments
TA-16 5094	16-010(c-f)	M	H	Permitting concerns
	16-016(a,b)	M	H	Permitting concerns
	16-019	M	H	Suspected releases from MDA-R to perched ground water

Field Unit Four

Aggregate Description	PRS	LANL Priority	NMED Priority	Comments
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	
Canada del Buey				
/Sandia	C-0-00(7,9)	H	H	
Gauje/Bayo/Barrancas				
/Rendija	C-0-00(1-4)	M	H	
Water				
/Canon de Valle	C-0-0(14,16)	M	H	
Ancho/Indio				
/Chaquehui	C-0-0(17-19)	H	H	

Field Unit Four

Aggregate	<u>PRS</u>	LANL	NMED	<u>Comments</u>
<u>Description</u>		<u>Priority</u>	<u>Priority</u>	
Potrillo/Fence	C-0-013	H	H	
TA-5 Agg B	5-002	M	H	SWMUs in this aggregate have a wide variation in SRS numbers, whereas the canyonside disposal is considered high to NMED.

Field Unit Five

Aggregate	<u>PRS</u>	LANL	NMED	<u>Comments</u>
<u>Description</u>		<u>Priority</u>	<u>Priority</u>	
TA-50 Bld 1	50-001(a)	M	H	known releases
TA-50	50-006(d)	H	H	in activity data sheets, this SWMU is listed in activities beyond FY98; need clarification.
TA-49 MDA AB	49-001(a-g)	M	H	releases to regional aquifer suggested from data
TA-54 Area G		M	H	the schedule proposed for drilling is unacceptable given the release information



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

GARY E. JOHNSON
GOVERNOR

21 May 1996

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

Attachment B

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, we recommended that LANL focus its efforts (i.e., cleanup, stabilization, etc.) to 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, Rad- and Chem-Van data obtained at E-F firing site (TA-15) show gross beta at 1,469 pCi/g, lead at 335 ppm and uranium at 2291 ppm in soil/sediment within a drainage located south of the site (LANL, RFI Report for PRSs at TA-15, 1995). The drainage extends to Potrillo Canyon; therefore, primary or fixed contaminants may have been transported into Potrillo Canyon. Other sites include: 1) SWMU 3-056(c), which contained PCBs as high as 33,000 ppm that may have re-mobilized by erosional processes and deposited downstream (LANL, NOD for SWMU 3-056(c), Expedited Cleanup Status Report, 1996), 2) SWMU 1-001(d), located on the south facing hillside of Los Alamos Canyon, which contains concentrations of plutonium-239/240 (7,282 pCi/g), mercury (1,770 ppm), chromium (398 ppm) and lead (548 ppm) of which may be entering Los Alamos Canyon and ultimately the Rio Grande (see LANL, Remedial Action Plan for SWMU 1-001(d) Hillside, 1996), and 3) SWMU 21-001(k), located on the north-facing side of DP Canyon, contains plutonium-239/240 at 46,000 pCi/g, and field observations at this SWMU show that erosional processes are occurring (see LANL, Phase Report 1C, TA-21 Operable Unit, 1994).

If there are any questions concerning this matter please contact me at 672-0448 or Michael Dale at 672-0449.

Sincerely,

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

SY:mrd

Post-It® Fax Note		7671	Date: 5.21.96	# of pages: 2
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