

REC'D 8/6/96
IN ITG



State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
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GARY E. JOHNSON
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EDGAR T. THORNTON, III
DEPUTY SECRETARY

Tracy

June 10, 1996

Mr. Theodore J. Taylor,
Program Manager
Department of Energy
Los Alamos Area Office
528 35th Street, Mail Stop A316
Los Alamos, New Mexico 87544

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

Dear Mr. Taylor:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has reviewed the Department of Energy (DOE) Los Alamos National Laboratory's (LANL) May 6, 1996, submittal of information containing 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 SWMUs 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 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.



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HSWA LANL G/M/P/96

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Mr. Theodore J. Taylor

June 10, 1996

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Thank you for your attention in this matter. If you should have any questions or comments please contact either me or Barbara Hoditschek of my staff at (505) 827-1558 or (505) 827-1561.

Sincerely,



Benito Garcia, Chief

Hazardous and Radioactive Materials Bureau

BG\td

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

lan\lanlpri2.056

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.

OFF-SITE;
 MAY HAVE
 DRIVERS FR.
 LANDOWNER, ETC.

GW CONTAINS
 IN ALLUV.
 SYSTEM
 (LADP. 4)
 (LAQUE)

- MDA-V DRILLED

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)

TO BE DONE w/ OTHER
 RCRA CLOSURES
 BY PROG OFFICE w/
 HI PRIORITY
 WILL BE ADDRESSED IN 180 DAYS
 (CLOSED OR PERMITTED)

Mr. Taylor
 June 10, 1996
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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	16-010(c-f)	M	H	Permitting concerns } LANL DEFERRED PERMIT IN-HOUSE
	16-016(a,b)	M.	H	Permitting concerns ← NOT ON DRAFT REPERAN (b)
	16-019	M	H	Suspected releases from MDA-R to ground water

FLD W/L 10/96
CONCERN ADDRESSED

Field Unit Four

<u>Aggregate Description</u>	<u>PRS</u>	<u>LANL Priority</u>	<u>NMED Priority</u>	<u>Comments</u>
Los Alamos/Pueblo	C-0-00(5-6)	H	H	High potential for migration of releases
Mortandad	C-0-008	H	H	as above
Pajarito/Threemile				
/Twomile	C-0-0(10-12)	H	H	as above
Canada del Buey				
/Sandia	C-0-00(7,9)	H	H	as above
Gauje/Bayo/Barrancas				
/Rendija	C-0-00(1-4)	M	H	as above
Water				
/Canon de Valle	C-0-0(14,16)	M	H	as above
Ancho/Indio				
/Chaquehui	C-0-0(17-19)	H	H	as above

Field Unit Four

<u>Aggregate Description</u>	<u>PRS</u>	<u>LANL Priority</u>	<u>NMED Priority</u>	<u>Comments</u>
Potrillo/Fence	C-0-013	H	H	as above
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.

ADDRESSED

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
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 <u>regional</u> aquifer have been suggested from available data
TA-54 Area G		M	H	✓ the schedule proposed for drilling is unacceptable given current release information

TOUR @ TA-50 SHOWED ACTIVITIES REASONABLE

DT-SA, 4, 10

ADDRESSED



GARY E. JOHNSON
GOVERNOR

21 May 1996

Tracy
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State of New Mexico
ENVIRONMENT DEPARTMENT
DOE OVERSIGHT BUREAU
P.O. Box 1663, MS/J-998
Los Alamos, New Mexico 87545

MARK E. WEIDLER
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ATT B

Mr. Court Fesmire, LAO 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 Janicak, NMED, DOE OB, LANL POC
New Mexico Environment Department

SY:mrd

8/6/96

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