



State of New Mexico  
ENVIRONMENT DEPARTMENT  
Surface Water Quality Bureau



Harold Runnels Building  
1190 St. Francis Drive, P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-0187

MARK E. WEIDLER  
SECRETARY

EDGAR T. THORNTON, III  
DEPUTY SECRETARY

GARY E. JOHNSON  
GOVERNOR



February 5, 1997

Mr. Dennis J. Erickson  
Division Director Environment, Safety, and Health Division  
Environmental Restoration Project  
MS M992  
Los Alamos, New Mexico 87545

RE: Review Comments on Requested Information

Dear Mr. Erickson:

On May 13, 1996, NMED received from the Los Alamos National Laboratory's (LANL) Environmental Restoration (ER) Project information intended to satisfy Phase 1 of the information requested in a letter written by Mr. Jim Piatt dated February 8, 1996 and May 2, 1996, as well as subsequent requests made in meetings with University of California and Department of Energy (DOE) staff, and telephone conversations between Glenn Saums of the Surface Water Quality Bureau (SWQB) and Bonnie Koch of the DOE. Review of the material was delayed due to the volume of information provided and staffing problems at SWQB.

The information consisted of the following four items:

- \* Topographical maps indicating 668 potential release sites (PRSs) that have been identified by the ER Project as sites that are in or near watercourses.
- \* A table entitled, "Surface Water Phase 1 Potential Release Sites".
- \* A table entitled, "Maximum Concentrations for Phase 1 Potential Release Sites".
- \* A draft copy of ER Project's Water Quality Assessment and Notification Checklist.

Each item was reviewed by both SWQB and DOE Oversight Bureau (DOE/OB). The following comments were generated:

1. The topographical map of the 668 PRSs sites in or near watercourses proved to be a learning experience. The abundance of PRS's in one small area on one map made it difficult to delineate individual sites. Separate maps of the same scale may be a more practical way of presenting this information. This would be especially useful in presenting the location of the Voluntary Corrective Action (VCA), Expedited Cleanup, and Interim Action sites. Also, many to the PRS's in the data packet were not on the map and some of the PRS's on the map had no associated data in the data packet.

File: HSWA 2/19/97  
Review: LANL, 2/5/97, 2/7/97, SWQB, RE, HSWA

~~SECRET~~ JOHN K.

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2. Regarding the table listing 668 Surface Water Phase One Potential Release Sites:
  - a) It would be helpful if the table included a column that lists the SRS Rank for each site.
  - b) Will this table be updated? During the review process AIP has found some PRS's and AOC's that were not listed and could be included on the update.
  - c) What is the schedule for the "validation" of each of the 668 sites listed on this table? Currently only 92 of these sites have been "validated".
  - d) What is the schedule for "validation" for the 169 of the 668 sites that have had some level of investigation completed and have been recommended for NFA, the 129 sites that have existing RFI Reports and the 150 that were scheduled to be in RFI Reports by Fiscal Year 1996?
  - e) To what extent does "validation" represent an environmental assessment. How will the information from ESH-18 environmental assessments be incorporated into this database?
3. Regarding the Table entitled "Maximum Concentrations for Phase 1 Potential Release Sites":
  - a) For Volatile and Semi-Volatile constituents it would be helpful if chemical names were included with the Chemical Abstracts Service Registry Number (CAS RN).
  - b) The current table only references 95 of the 686 sites. When will the information on the other sites be provided?

In addition, review of the RFI's (submitted in boxes) revealed the following:

- a) Some reports described conditions that alerted the reviewer to surface water concerns. These PRS's of concern did not always correspond to LANL's Table listing PRS's on or near watercourses. This raises the issue of how LANL determined which PRS's were on or near watercourses.
- b) In some reports possible surface water concerns were acknowledged and some attempt was made to address the concern. Some reports ignored any possible surface water issues because the author for determining further action or no further action (NFA) focused only on constituents regulated under RCRA. In any case, some reports have information that possibly can be used to delineate the extent of the surface water issue. This information needs to be gathered and presented in separate reports that addresses surface water issues. SWQB and LANL need to have further discussions regarding how the these reports are to be written.

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- c) Database information on the 668 sites listed in the Phase 1 submittal should be provided to NMED DOE/OB for entry onto their database until LANL has resolved problems associated with FIMAD.

LANL also neglected to provide a prioritization and implementation plan which incorporates, at a minimum, the proximity of each site to a watercourse, the areal extent of contamination, and the likelihood of contaminant mobilization and transport to a watercourse.

In addition, LANL also neglected to provide a written commitment that based on the above prioritization, designs, implements and monitors (to insure effectiveness) interim Best Management Practices (BMPs) as necessary to prevent the spread of these contaminants until final remediation of the site is accomplished. Although there are indications that there has been improvement in this area, a commitment, which could be included as part of the Document of Understanding (DOU) would ensure that this approach would be a consistent-wide DOE policy.

If there any questions concerning these comments, please contact Barbara Hoditschek of my staff at (505) 827-0596.

Sincerely,



Glenn Saums, Manager  
Point Source Regulation Section  
Surface Water Quality Bureau

cc: Ed Kelley, Ph.D., Director, WWMD  
Ralph Ford-Schmid, NMED DOE/OB  
John Kieling, HRMB  
Tom Baca, Director, Env. Mgmt.  
Ted Taylor, DOE-LAAO  
Bonnie Koch, LAAO  
Steve Rae, LANL ESH-18  
John Arthur, DOE-AL  
File