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

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

October 2, 1996

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

SUBJECT: Review of Los Alamos National Laboratory's (LANL) Corrective Action Report for TA-18 Septic Tank Leach Field

Dear Mr. Johansen:

This conveys New Mexico Environment Department (NMED), Department of Energy Oversight Bureau's (DOE OB) review of the referenced report. The following comments are provided for the purpose of communicating the results of the DOE OB review. These comments are not provided or intended for the purpose of representing the regulatory position of the New Mexico Environment Department.

COMMENTS

1). Page 6, Section 3.3.2.1, First Paragraph, First Sentence

Does this statement imply that data exist concerning the most western extent of perched ground-water within Pajarito Canyon? That is, what data exist to show that the western extent of the aquifer lies 1-mile to the west of TA-18? DOE OB staff have observed perennial flow from several springs located in Pajarito Canyon (approximately 4 mi west of TA-18) that may supply recharge to a suspected saturated alluvium aquifer which may extend eastward to monitoring well PCO-3. Saturated alluvium in Threemile Canyon also exists and laterally extends an unknown distance. Characterization of these zones should be performed.

13129

(strategically located to intercept contaminants) placement of MW-13; 2 to 3 hand-held pneumatic-auger boreholes (preferably to ground water and completed as piezometers) be installed along the septic line from the septic tank to the fence north of Building 116. These stations would help determine if contaminant releases have occurred along the septic line. Quarterly monitoring is initially recommended in order to determine seasonal fluctuations in ground-water levels as they may relate to contaminant concentration variations.

7). Page 14, Section 3.5.2, Second Paragraph, Fifth Sentence

DOE OB recommends the addition of the more common high explosive (HE), and radionuclide (notably uranium) parameters to the proposed sampling and analysis listed in Table 3-5. The DOE OB has current data which indicate that HE and its breakdown products were detected in a spring (Threemile Spring referenced in Comment 2) that discharges to the main drainage of Threemile Canyon west of the PRS area. Table 3-3 (Data Comparison for PRS 18-003(d)(concluded)) presents only a limited amount (one sample #AAB4604) of radionuclide parameter ground-water data to conclude that there is no ground-water radionuclide concern. The sludge samples AAA5826 and AAA5827 that show elevated uranium concentrations would support the argument for its inclusion in the proposed sampling and analysis for these wells.

Please feel free to contact Michael Dale of our staff at 672-0449 if any question arise.

Sincerely,

Stephen Yanicak

Steve Yanicak, LANL POC
Department of Energy Oversight Bureau

SY:mrd
cc: Neil Weber, NMED, Chief, DOE OB
Martyne Kieling, NMED, DOE OB
Glenn Saums, NMED, Program Manager, SWQB
John Rogers, NMED, GWQB
Ken Zamora, DOE LAAO, MS A316
Theodore Taylor, DOE LAAO, MS A316
Everett Trollinger, DOE LAAO, FU-2 FPC, MS A316