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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

March 23, 1999

Mr. Theodore Taylor, Project Manager
Los Alamos Area Office-Department of Energy
528 35th Street MS-A316
Los Alamos, New Mexico 87544

Dr. John Browne, Director
Los Alamos National Laboratory
P.O. Box 1663, MS-A100
Los Alamos, NM 87545

RE: HRMB Recommendations Concerning the Proposed Watershed and Aggregate
Prioritization, Los Alamos National Laboratory, NM 0890010515

Dear Mr. Taylor and Dr. Browne:

The RCRA Permits Management Program (RPMP) of the New Mexico Environment Department has reviewed the proposed Watershed and Aggregate Prioritization. RPMP's recommendations do not reflect land transfer issues and are based primarily on: knowledge of the concentrations of contamination present, potential threats to human health and the environment, possible impacts to the ground and surface water, contaminant inventories and amount of work accomplished within each aggregate and watershed. RPMP believes that land transfer issues should **not** be a major factor influencing prioritization of the aggregates and watersheds. Attached are copies of portions of the watersheds with suggested aggregate boundary changes. RPMP is making the following recommendations:

- Move the LA/Pueblo watershed ahead of the Mortandad watershed in priority. The rationale for RPMP's recommendation is as follows: 1) the LA/Pueblo Canyon investigation has progressed; data and interpretation are available 2) high priority sites abound TA-21, ash pile, hillsides, etc. 3) easier accessibility, (human health issues) 4) the Mortandad Canyon investigation is in the initial stages of data collection.



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- RPMP LA/Pueblo Canyon Watershed Aggregate Prioritization recommended changes:

Create another aggregate (Aggregate 6) below the reach at the LA/DP canyon confluence. Aggregate 6 is suggested to have a low ranking and while ranking Aggregates 4 and 5 as medium and high priorities respectively (see attached maps).

- RPMP Mortandad Canyon Watershed Aggregate Prioritization recommended changes:

Aggregate 1 - Upper Mortandad, change from a high to medium priority. Although this aggregate includes effluent canyon, TA-50's treatment facility outfall, most of the impacts to the surface and subsurface are likely to or have occurred in Aggregate 2 from historic and current releases from both TA-35 and TA-50.

Aggregate 2 - Middle Mortandad/Ten-Site change from a medium to high priority. Also, move the eastern boundary east of sediment traps, most of the contaminant transport (both surface and subsurface) occurs in this stretch of the Mortandad/Ten-Site Canyon watershed.

Extend the eastern boundary of Aggregate 2 to include the Mortandad Canyon reach M-4 or to at least include the sediment traps. RPMP believes this to be appropriate as the majority of surface water, ground water, and potential for surface and subsurface contaminant migration concerns occur in this stretch of Mortandad Canyon (See attached map).

Aggregate 5 - Middle Cañada del Buey, change from a low to medium priority due to surface water concerns with mercury and plutonium from TA-46 and TA-54.

Aggregate 6 - Lower Mortandad/Cañada del Buey, change from a high to low priority. Also, move the western aggregate boundary to the gaging/monitoring station located below MDA G at TA-54. Currently there does not seem to be immediate threat to human health and the environment in this aggregate and land transfer issues should not influence prioritization (see attached maps).

- RPMP Pajarito Canyon Watershed Aggregate Prioritization recommended changes:

Aggregate 2 - Starmer/Upper Pajarito, change from a low to medium priority due to high explosive releases to surface water and springs in the area.

Aggregate 3 - Three Mile, change from a low to medium priority due to High Explosive releases to surface water and springs in the area.

- RPMP Ancho Canyon Watershed Aggregate Prioritization recommended changes:

Aggregate 1 - North Ancho, change from a low to medium priority due to known and potential impacts to groundwater and surface water (high explosives, nitrates, mercury, etc.).

In addition to the above list of recommendations, RPMP needs to know how groundwater investigations are or may be affected and prioritized by the aggregation. Also, RPMP must work with LANL/DOE to determine the appropriate deliverables (i.e., number of SWMU's/PRS's per submitted document and other issues that may arise from this approach).

Should you have any questions, please feel free to contact Mr. John Kieling, RPMP's LANL Facility Manager at (505) 827-1558, extension 1012.

Sincerely,



Robert S. (Stu) Dinwiddie, Ph. D.
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau

RSD:jry

attachment

cc:

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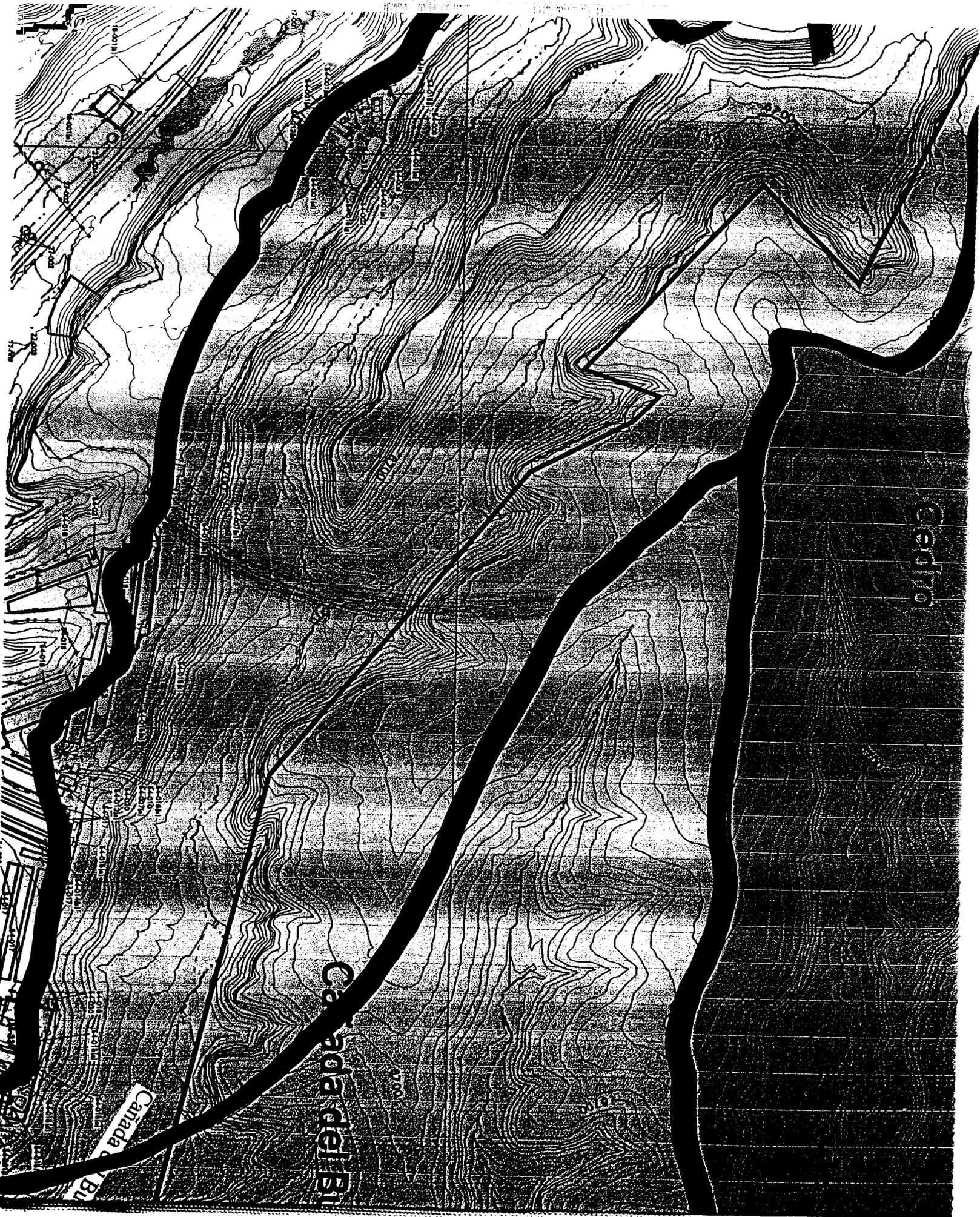
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TABLE 5.1: SUMMARY OF WATERSHED AND AGGREGATE PRIORITIZATION

Prioritized Watersheds (preliminary)	Aggregate Numbers Corresponding to Maps	Prioritized Aggregates (Within Watersheds)	Prioritized Aggregates (Overall)
LA/Pueblo	4	Upper Los Alamos	M
	3	Pueblo	H
	2	Bayo	M
	1	Rendija/Barrancas Guaje	L
	5	DP Site	H
	6	Lower Los Alamos	L
Mortandad	2	Middle Mortandad/Ten-Site	H
	1	Upper Mortandad	M
	4	Lower Mortandad/Cedro	L
	5	Middle Canada del Buey	M
	6	Lower Mortandad/Canada del Buey	L
	3	Upper Canada del Buey	M
Water/Valle	1	Canon de Valle	H
	2	S-Site (Martin)	M
	3	Upper Water	L
	5	Lower Water/Indio	L
	4	Potrillo/Fence	M
Sandia	1	Upper Sandia	M
	2	Lower Sandia	L
Pajarito	3	Threemile	M
	4	Lower Pajarito	M
	2	Starmer/Upper Pajarito	M
	1	Upper Twomile Twomile	L
Ancho	1	North Ancho	M
	2	South Ancho	L
Chaquehui	1	Chaquehui	L
Frijoles	1	Frijoles	L







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