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November 21, 2000

Elizabeth Withers
SEA Document Manager
Los Alamos Area Office
U.S. Department of Energy
Los Alamos, N.M. 87544

Dear Ms. Withers:

RE: SPECIAL ENVIRONMENTAL ANALYSIS (SEA) FOR THE DEPARTMENT OF ENERGY, NATIONAL NUCLEAR SECURITY ADMINISTRATION: ACTIONS TAKEN IN RESPONSE TO THE CERRO GRANDE FIRE AT LOS ALAMOS NATIONAL LABORATORY, LOS ALAMOS, N.M.; LOS ALAMOS AREA OFFICE, USDOE, SEPTEMBER 2000

This transmits New Mexico Environment Department (NMED) staff comments concerning the above-referenced Special Environmental Analysis (SEA).

A. All best management practices (BMP's) should have a routine maintenance schedule referenced in the document. It is of utmost importance to maintain the integrity of the run-on/run-off controls at potential release sites (PRS's) located within the facility boundaries of Los Alamos National Laboratory (LANL). PRS's at LANL include solid waste management units as well as areas of concern.

Storm water monitoring should also occur at the higher priority PRS's to evaluate the effectiveness of the BMP's. Prevention of contaminant migration is required under LANL's current RCRA permit (Module II, § II.N Spills) administered by the New Mexico Environment Department's Hazardous Waste Bureau. In addition, LANL's Multi-Sector General Permit Storm Water Pollution Prevention Permit administered by the Environmental Protection Agency requires storm water monitoring. A contingency plan should also be developed to address those BMP's deemed ineffective by storm water monitoring.

B. LANL should develop contingency plan(s) that will address the potential impacts to downstream receptors from sediment deposition and use of contaminated ground and surface water (e.g., San Ildefonso, Cochiti Reservoir and agricultural). For example, contaminant migration resulting from erosion and floods and deposition of contaminated sediments may occur off-site and pose an unacceptable risk. The sediment deposited by the flood will need characterized and remedial action(s) options may be required.

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C. On page 3-33, section 3.14, Human Health, LANL mentions that "storm water run-off monitoring indicate that concentrations of plutonium-239 and other radionuclides are below allowable concentrations for public drinking water". If a potential receptor drinks surface water this may be an acceptable comparison; however, there are other pathways/receptors that need to be addressed. For example, floods may deposit contaminated sediment on tribal lands used for agricultural or cultural purposes. In this case, the comparison to drinking water standards is not appropriate and other receptors/pathways need to be evaluated.

D. LANL should outline what actions were taken to protect production and monitoring wells (alluvial, intermediate and regional) from potential flooding as a result of the fire. All monitoring wells, moisture access tubes, etc. damaged by the fire or no longer in use need to be either repaired or plugged and abandoned as they may provide pathways for contaminated flood waters to the subsurface. If repairing or plugging and abandoning these wells did not occur immediately following the fire, LANL should submit a schedule and plan to do so.

E. The various engineered structures (e.g., Pajarito Canyon Flood Retention Structure and Los Alamos Canyon Low-Head Weir) may enhance groundwater recharge. This may occur during high flow events that transport large volumes of sediment and debris or as the outlet pipes are blocked and water ponds due to build up of sediment. Pajarito Canyon surface water currently contains low levels of high explosive compounds and storm water may pick up additional constituents that could adversely impact the ground water. LANL should install monitoring wells to evaluate recharge and potential impacts to the groundwater caused by these structures.

F. LANL should develop contingency plan(s) to remove sediment that settles out behind the engineered structures. Potentially hazardous and/or radioactively contaminated sediment may require characterization and proper disposal to minimize negative affects to human health and the environment.

G. LANL should indicate when the Pajarito Canyon Flood Retention Structure and Los Alamos Canyon Low-Head Weir will be removed after the threat of severe flooding has diminished.

H. The activities outlined above need to be funded separately to ensure that current environmental restoration and monitoring and surveillance projects are not delayed and/or not completed.

I. Regarding air quality, the SEA appears to assess only those impacts associated with emergency activities associated with the Cerro Grande Fire. We assume that a more detailed document addressing the region of influence (ROI) impacts of the fire is forthcoming. We also recommend that the report be released in the near future and address the following items:

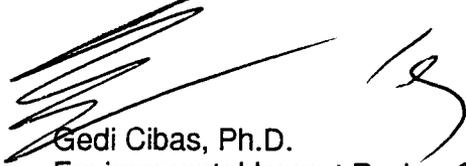
- NEWNET and AIRNET monitoring data, such as radiological and particulate emissions data from the Jemez Pueblo.
- Lead and asbestos particulate emissions from LANL buildings and structures, both during and after the fire.
- Modeled PM10 exposure of citizens within the ROI.
- JAG and NMED air monitoring results.

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- Additional vehicular emissions data and monitored asbestos emissions data during demolition and rebuilding of LANL structures.

We appreciate the opportunity to comment on this document. Please let me know if you have any other questions on the above.

Sincerely,

A handwritten signature in black ink, appearing to be 'Gedi Cibas', written over a horizontal line.

Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

NMED File No. 1404ER