

General

James Bearzi/Fik



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July 29, 2002

Elizabeth Withers
NEPA Compliance Officer
Office of Los Alamos Site Operations
528 35th Street
Los Alamos, N.M. 87544

FAX: (505) 667-9998

Dear Ms. Withers:

RE: PREDECISIONAL DRAFT ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED FUTURE DISPOSITION OF CERTAIN CERRO GRANDE FIRE FLOOD AND SEDIMENT RETENTION STRUCTURES AT LOS ALAMOS NATIONAL LABORATORY, LOS ALAMOS, NEW MEXICO; DOE/EA-1408; JULY 8, 2002

This transmits New Mexico Environment Department (NMED) staff comments concerning the above-referenced Predecisional Draft Environmental Assessment (PDEA).

AIR QUALITY

The proposed project will be located in Los Alamos County. This area is currently considered to be in attainment with all state and national ambient air quality standards.

The PDEA should include a better description of the demolition dust-related impacts. How demolition is performed will impact the amount of dust generated by demolition. A description of dust control practices for demolition will allow an analysis of the air quality during demolition.

Successful revegetation of the sites as proposed will result in long-term stabilization and lessened wind erosion potential.

HAZARDOUS WASTE

Before any action is taken to remove the structures described in the PDEA, the soil and vegetation would be stabilized or restored to near pre-fire conditions and the stormwater flows would have returned to pre-fire levels; consequently the Flood Retention Structure (FRS) would no longer be necessary to control flows in Pajarito Canyon. We consider the Disassembly Alternative for the FRS to be the preferred action. The streambed should be allowed to resume



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natural flow without future floodwater retention. Because partial removal (Proposed Action) would not allow Pajarito Canyon to attain pre-FRS conditions, it is considered to be less preferable than complete removal of the structure. Partial removal would also require maintenance and potentially expensive disposal costs for the ponded debris and sediment.

The amount of soil to be removed from the upstream reservoir associated with the FRS is an estimated volume. We are concerned that the PDEA states that further NEPA review will be needed if the amount of soil to be removed exceeds the estimated amount. There should be a tangible level (i.e. the natural ground surface) to which soil should be removed, regardless of the actual volume.

Due to historic and potentially ongoing contaminant releases to Pajarito Canyon from LANL activities, we believe that a soil sampling plan should be enacted before any soil is removed from the reservoir area associated with the FRS. Although the PDEA states that Potential Release Sites (PRSS) have been stabilized, we do not have evidence of that fact. Historic releases of solid wastes as well as hazardous and radioactive constituents have been delivered to the canyon bottom and are mobilized by flood waters, undoubtedly resulting in deposition of contaminated sediments behind the FRS. We are also concerned about the concentration of contaminants in the ash deposits from the Cerro Grande Fire which have washed into the canyon. As stated in the PDEA, the potential for the migration of chemical, radiological and heavy metal constituents in the canyons has increased due to increased surface runoff and erosion. Accumulated soil sediments should be tested for hazardous and radiological constituents and solid wastes (e.g. perchlorate) in several areas and at various depths prior to removal, so that they may be disposed of appropriately. Additionally, sediments at the outfall from the FRS, in particular the area where the channel is eroding, should be tested for the same constituents.

The PDEA states that unsaturated volcanic tuff and sediments insulate the regional aquifer from the perched aquifers. This statement is incorrect as there are indications (i.e. geochemical) of hydraulic connectivity between the aquifers. The intermediate aquifers are believed to be both a source of recharge to the main aquifer and a significant contaminant transport path. Fractures, faults and high permeability hydrostratigraphic units in the bedrock have been shown to provide pathways for downward water movement. There is also evidence of unsaturated flow to the regional aquifer from perched water.

We appreciate the opportunity to comment on this document.

Sincerely,



Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

NMED File No. 1611ER