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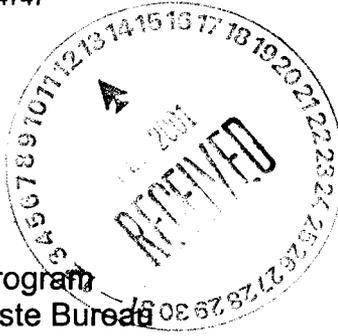


**U.S. Department of Energy**  
 Los Alamos Area Office, MS A316  
 Environmental Restoration Program  
 Los Alamos, New Mexico 87544  
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0-030(b), 0-004  
 0-010(b), 0-005(b)  
 6th Street Warehouse

G/m/01

HSWA LAUL



Date: February 5, 2001  
 Refer to: ER2001-0093



Mr. James Bearzi  
 Permits Management Program  
 NMED – Hazardous Waste Bureau  
 2044 A Galisteo Street  
 Santa Fe, NM 87502

**SUBJECT: TEMPORARY USE OF DP LAND SUBPARCEL BY LOS ALAMOS COUNTY**

Dear Mr. Bearzi:

The purpose of this letter is to provide to your office information related to activities planned by the Department of Energy (DOE) in response to a request by Los Alamos County (the County), to allow expedited access to a specific site south of DP Road in Los Alamos. The site is part of the DP Road land transfer tract, which ultimately will be transferred to Los Alamos County by DOE pursuant to Public Law 105-119. The County has asked DOE to make lands available for temporary use for contractor laydown in advance of transfer, to support the rebuilding of Los Alamos in the wake of the Cerro Grande fire.

**Background**

As discussed in phone conversations and during a January 31, 2001 meeting between our staffs, DOE proposes to provide Los Alamos County with access to portions of several of the Public Law 105-119 Land Transfer parcels in February, 2001, on a temporary-use basis prior to formal conveyance and transfer. Completion of transfer for many of these land parcels may not occur for several years; however, the County has requested earlier access to some DOE land in order to provide contractors with materials laydown/storage areas to support the rebuilding of Los Alamos in the wake of the Cerro Grande fire. This access will be by special use permit, not through a lease or other, more formal conveyance/transfer instrument. DOE will closely control the conditions of access, and will provide mechanisms in the special use permits to ensure continuing oversight by DOE of County and contractor activities on the parcels.

Three areas are currently under consideration for special use permits: portions of the Airport and White Rock Land Transfer tracts, and the DP Road subparcel, south of DP Road in Los Alamos. Two of the areas have no potential release sites (PRSs) associated with them. The DP Road subparcel does, however. The DP Road subparcel is the eastern portion of the DP Road Land Transfer tract, bounded by DP Road to the north, the fence east of the 6<sup>th</sup> Street warehouses on the west, the Los Alamos Canyon rim to the south, and the Material Disposal Area B western

TC



February 5, 2001

boundary fence on the east. Within this area is a single PRS, 0-030(b), a septic tank and associated leach field and piping, which formerly served the 6<sup>th</sup> Street warehouses. A portion of this PRS, which is listed within the HSWA module of the Los Alamos National Laboratory's (LANL's) hazardous waste operating permit, was proposed, but not approved, for No Further Action (NFA) in 1996. This proposal was solely based on human health risk and did not include an eco-Risk evaluation. Details of this PRS are provided in the report entitled RFI Report for Potential Release Sites 0-030(b), 0-004, 0-010(b), and 0-033(b), 6<sup>th</sup> Street Warehouses (LA-UR-96-1749, LANL Environmental Restoration (ER) Project, May, 1996), and associated documents, which have been provided to you previously.

### DOE's Planned Actions

Based on previous investigations, DOE and the ER Project believe that there are no unacceptable human health risks associated with the anticipated temporary industrial use of this sub-parcel by County personnel and contractors. The enclosed tables, excerpted from the report entitled Environmental Restoration Report to support Land Conveyance and Transfer under Public Law 105-119, Final (LA-UR-99-4187), LANL ER Project, August, 1999) summarize the pertinent contaminant data for all PRSs within the entire DP Road Land Transfer tract, including PRS 0-030(b). However, NMED and the ER Project agreed that additional sampling ultimately may be necessary in the leach-field and drain-line portions of this PRS in order to confirm absence of ecological risk and support a final action on the NFA request. Therefore, DOE will impose conditions to ensure that such sampling can occur, for example, a condition requiring contractors to move materials where necessary to take samples.

Although specific details of planned uses of the site have not yet been provided by the County, we believe the County intends to use the land for building materials storage and staging only, with human occupancy being very limited and intermittent (i.e., no 24-hour 7-day occupancy). DOE intends to impose use restrictions including fencing the perimeter, prohibiting liquids or known hazardous materials storage, and requiring that DOE or Laboratory staff oversee any potential soil disturbance. Finally, DOE would retain rights of access to any portions of the site at all times during County occupancy, so that additional sampling by DOE or NMED, if required, would not be impeded by materials storage or other activities.

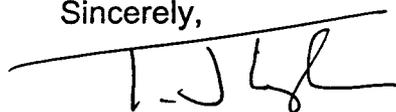
Please contact Dave McInroy at (505) 667-0819 or Gene Turner at (505) 667-5794 if you have further questions regarding this activity. We want to thank Mr. John Young and Ms. Darlene Goering of your staff for their continued support of this effort.

Sincerely,



Julie A. Canepa, Program Manager  
Los Alamos National Laboratory  
Environmental Restoration

Sincerely,



Theodore J. Taylor, Project Manager  
Department of Energy  
Los Alamos Area Office

JC/TT/PS/eim

Enclosure: Table 3.3.1 Contaminants Exceeding Region 9 Preliminary  
Remediation Goals (PRGs) Land Use Scenario: Commerical  
Development  
Table 3.3.2 Contaminants Exceeding Region 9 Preliminary  
Remediation Goals (PRGs) Land Use Scenario: Residential  
Development

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P. Wardwell, LC-GL, MS A187  
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J. Parker, NMED-DOE OB  
J. Young, NMED-HWB  
E/ER File, MS M992  
RPF, MS M707

**Table 3.3.1**  
**Contaminants Exceeding Region 9 Preliminary Remediation Goals (PRGs)**  
**Land Use Scenario: Commercial Development**

Contaminant	Industrial PRG	# Samples Collected	# Samples > PRG	Mean Conc. of Detects
Arsenic	3	84	10	2.1
Lead	1000	84	2	191
Arochlor-1260	1	97	1	0.41
Benzene	1.4	122	5	2.8
Benzo(a)pyrene	0.36	131	10	0.2
BHC(delta-)	NA <sup>32</sup>	67	NA	0.004
Ethylbenzene	230	122	2	62
Methylnaphthalene	55	131	6	35
Trimethylbenzene[1,2,4-]	170	122	14	88
Trimethylbenzene[1,2,5-]	70	122	11	26
Xylene (total)	210	108	10	194
Uranium-234	13	7	2	20

**Table 3.3.2**  
**Contaminants Exceeding Region 9 Preliminary Remediation Goals (PRGs)**  
**Land Use Scenario: Residential Development**

Contaminant	Residential PRG	# Samples Collected	# Samples > PRG	Mean Conc. of Detects
Arsenic	0.38	84	56	2.1
Cadmium	37	85	1	13
Copper	2800	85	2	128
Mercury	22	91	2	2.5
Lead	400	84	2	191
Arochlor-1260	1.0	97	1	0.41
Benzene	0.62	122	5	2.8
Benzo(a)anthracene	0.56	131	10	0.26
Benzo(a)pyrene	0.056	131	11	0.2
BHC(delta-)	NA	97	NA	0.0037
Chlordane(alpha-)	1.6	97	1	0.18
Chlordane(gamma-)	1.6	97	1	0.32
DDD[4,4'-]	2.4	93	1	1.1
Dibenz(a,h)anthracene	0.056	131	1	0.1
Ethylbenzene	230	122	2	62
Methylnaphthalene[2-]	55	131	6	35
Nitroso-di-n-propylamine[N-]	0.063	131	1	0.07
Trimethylbenzene[1,2,4-]	51	122	14	88
Trimethylbenzene[1,3,5-]	21	122	11	26
Xylene (total)	210	108	10	194
Plutonium-239	24	45	1	2.7
Uranium-234	13	7	2	20

### 3.4 Regulatory Status

Four of the 10 PRSs contained in the DP Road parcel are listed in the HSWA Module of LANL's RCRA permit. One of these PRSs is currently under investigation, and three have been recommended for no further action because

<sup>32</sup> Not available.

## **White Rock Tract**

Even though there are no PRSs on this tract, there are some known plutonium-contaminated sediments in this part of Canada del Buey (Land Tract Conveyance and Transfer EIS). The extent of contamination has not been determined but is believed to be confined to the western 40% of the tract (38 acres). The remaining part of the tract (closest to SR 4) is believed to be free of contamination.

*Recommendation: The county should be able to use this land if its activities are confined to the eastern portion of the tract.*

## **DP Road South Subparcel: 0-030(b)**

An RFI report was submitted and rejected in 1997 that included 0-030(b). A new report was never submitted. According to the attachment to the rejection letter, the extent of contamination was never determined "below the abandoned outfall or in the subsurface below the base of the leach field". Only two samples were collected from two leach field pipelines and no samples were collected below the outfall in the drainage.

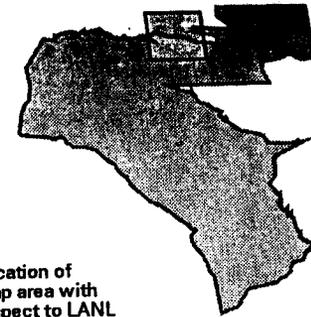
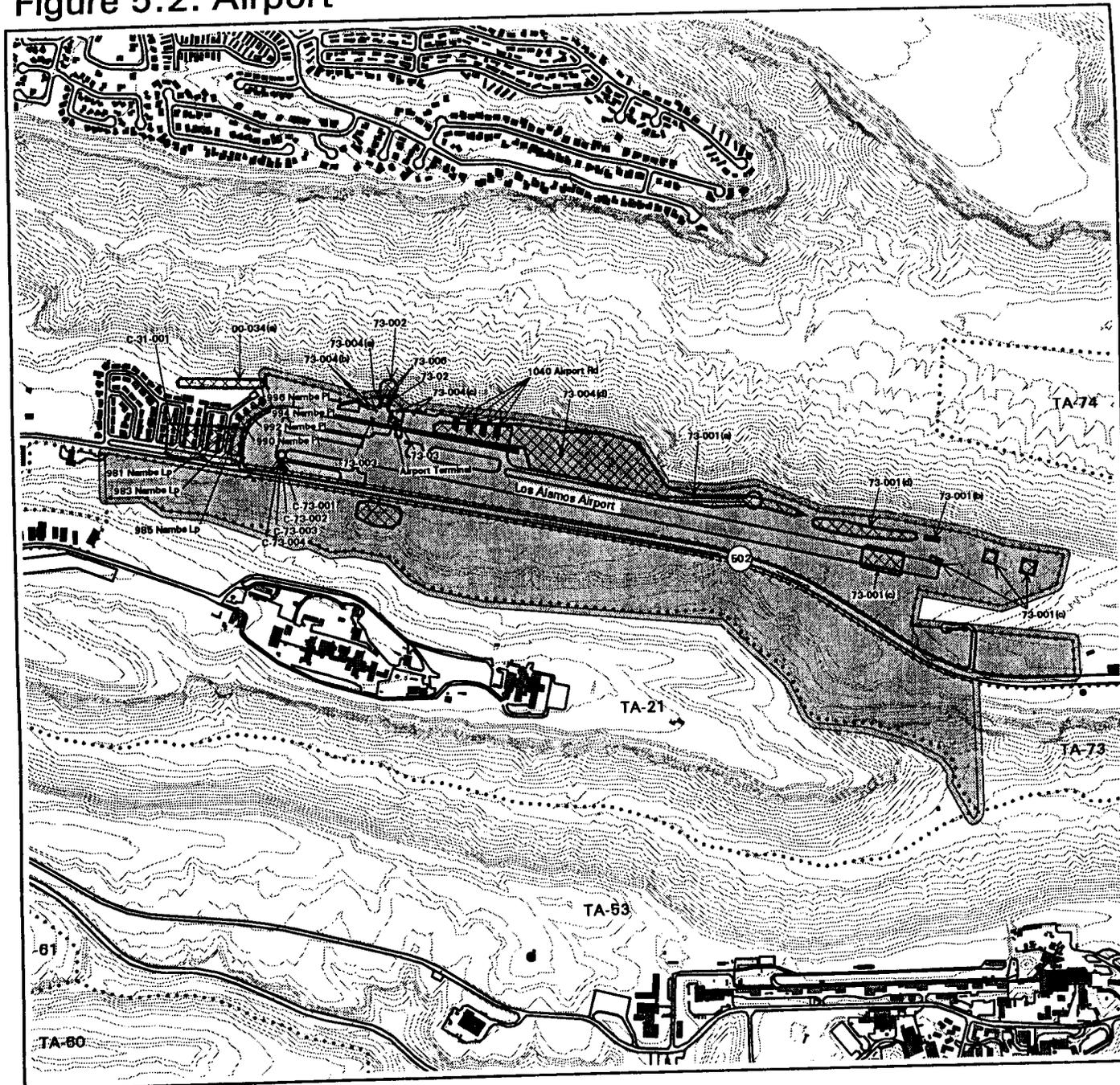
*Recommendation: Since the county has requested to use this entire subparcel, it should not be able to use this land. The leach field and the portion of the outfall that needs further investigation should be accessible for any further subsurface sampling that needs to be performed. Since this area has been highly disturbed already, it should be left alone and not further disturbed. The leachfield and outfall could be fenced off but, according to conversations with Paul Schumann, the county wants the entire subparcel because of its size.*

## **Airport Tract**

The only PRSs at the airport are located north of, northeast of, and underneath the runway. These PRS are slated for remediation (cap and monitoring) following additional site characterization.

*Recommendation: The county should be able to use only that portion of the tract that does not have any PRSs.*

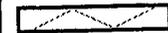
Figure 5.2: Airport



Location of map area with respect to LANL



Boundary, TA



Contour, 20 foot



Road, Paved



Building



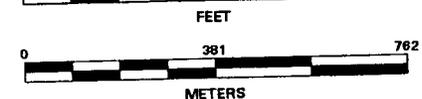
Potential Land Transfer Site



50 Foot Buffer Around Potential Land Transfer Site



Potential Release Site



State Plane Coordinate System, New Mexico Central Zone, 1983 North American Datum

NOTICE: The information on this map is provisional. Feature locations are dependent on scale and symbology and their accuracy may not have been confirmed. Data are from various sources and are part of the FIMAD repository.

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302

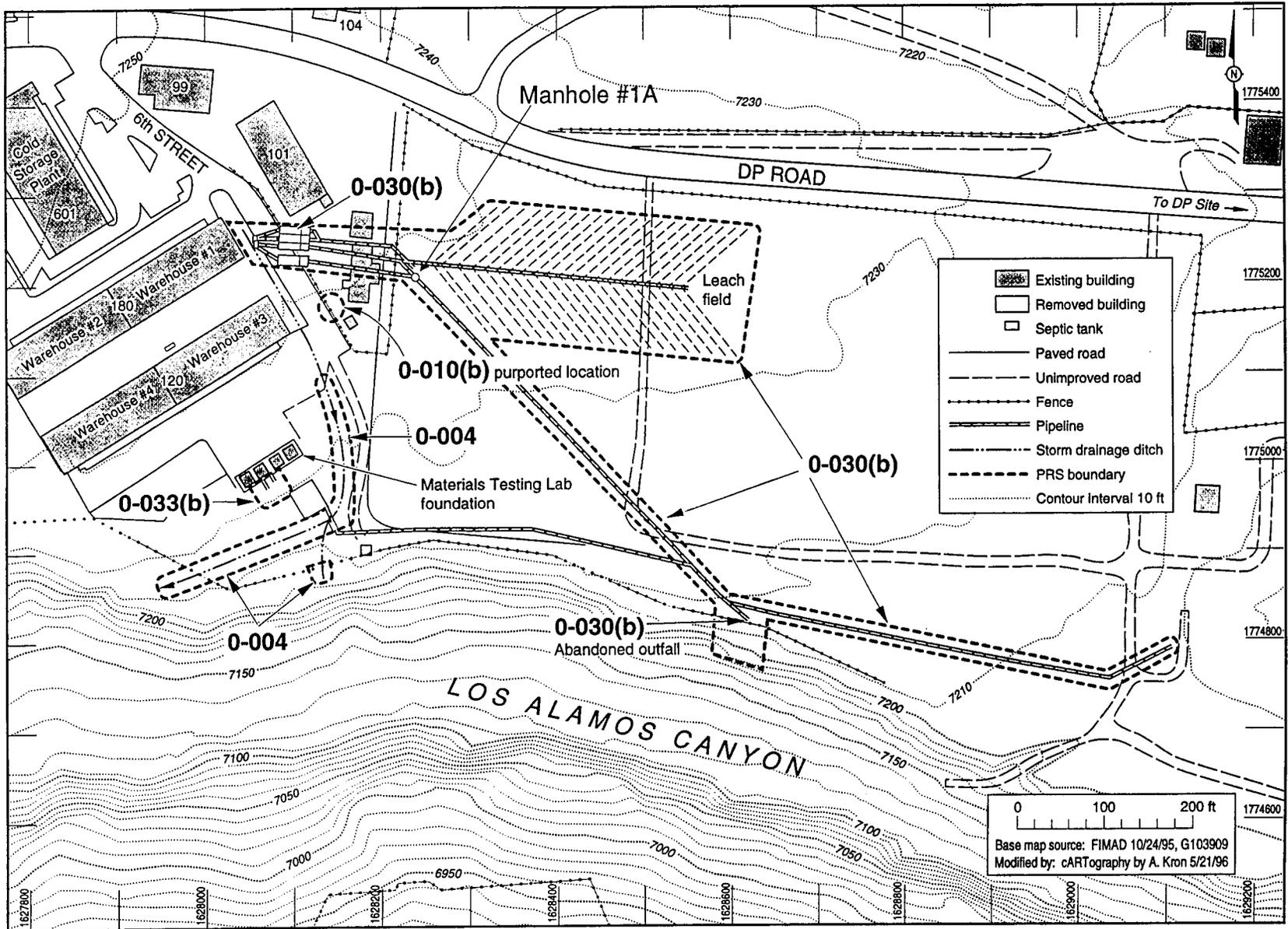
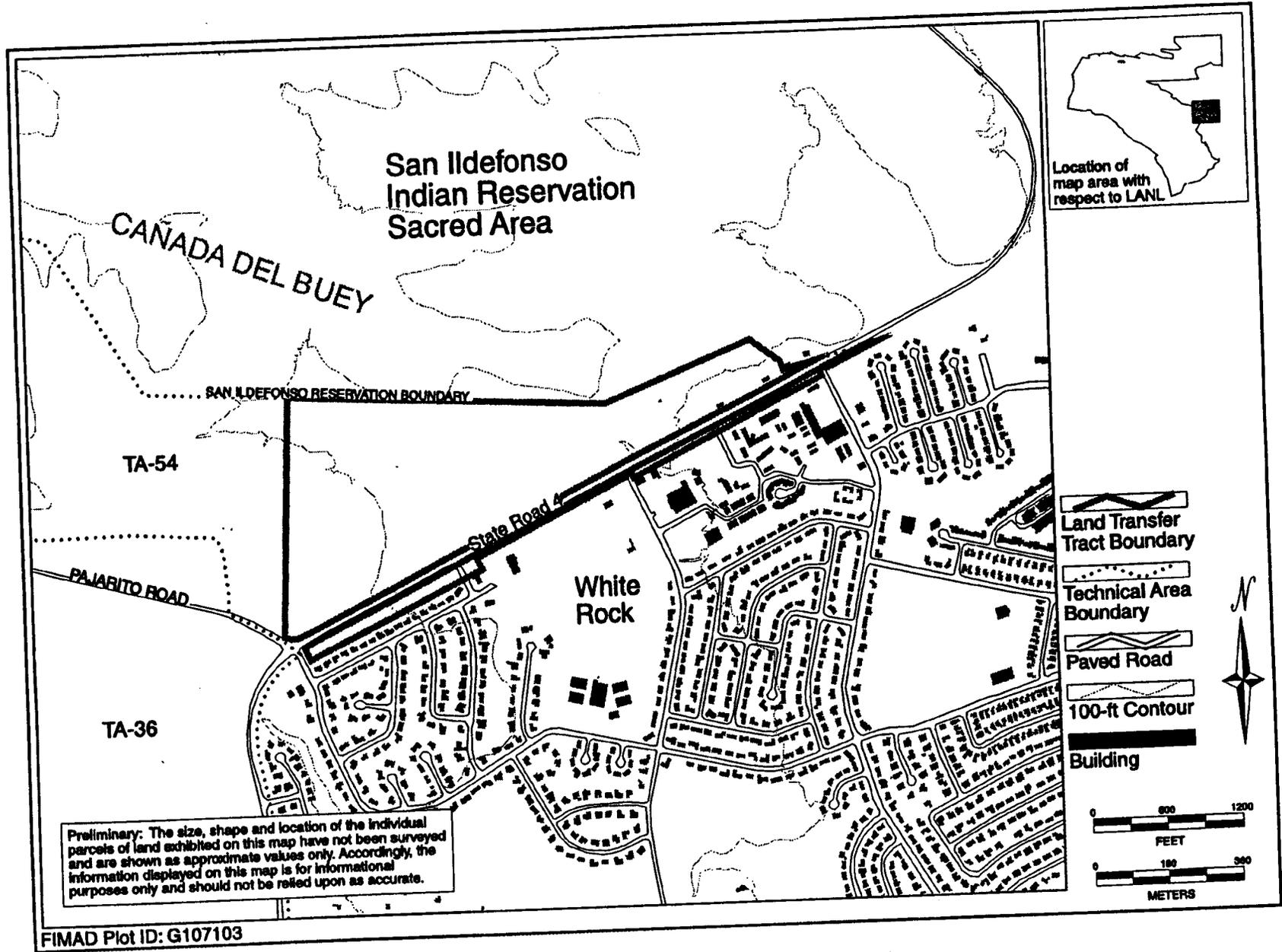


Fig. 1.1-4. PRS areas of investigation at the 6th Street warehouses.



FIMAD Plot ID: G107103

Figure 14.1.1-1. White Rock Tract Layout.

14.0 WHITE ROCK TRACT