

NPDES

Permit

LANL w/ AP 4.5

# Los Alamos

NATIONAL LABORATORY

Environment, Safety and Health Division  
Los Alamos, New Mexico 87545  
FAX (505) 665-3811

Date: April 11, 1997

In Reply Refer To: ESH-DO:97-102

Mail Stop: K491

Telephone: (505) 667-4218

Mr. Glenn Saums  
Manager, Point Source Regulation Section  
Surface Water Quality Bureau  
New Mexico Environment Department  
P.O. Box 26110  
Santa Fe, New Mexico 87502

**SUBJECT: RESPONSE TO MEMORANDUM OF FEBRUARY 5, 1997,  
"REVIEW COMMENTS ON REQUESTED INFORMATION"**

Dear Mr. Saums:

The enclosed information is being provided in response to your letter of February 5, 1997. The Laboratory's Environment, Safety and Health (ESH) Division and Environmental Restoration (ER) Project have reviewed your comments and believe that most of these issues have been addressed in previous discussions or in previous correspondence. We hope that the following information will be helpful to you as a summary report on ESH Division and ER Project efforts in completing NMED requests.

Please contact Mike Alexander (665-4752) of ESH Division's Water Quality and Hydrology Group or Dave McInroy (667-0819) of the ER Project if you need any additional information at this time. Laboratory staff are available to meet with you at your convenience to provide further clarification if such would be helpful.

Sincerely,



Dennis J. Erickson  
Division Director  
Environmental, Safety, and Health Division

SR:DJE/tp

Attach: a/s

Cy: : B. Koch, DOE/LAAO, w/att., MS A316  
T. Baca, EM, w/att., MS J591  
J. Jansen, ER, w/att., MS M992  
D. McInroy, ER, w/att., MS M992  
J. White, ESH-19, w/att., MS K498  
P. Shanley, ER-ESH-19, w/att., MS K498  
S. Rae (ESH-18:97-WQ&H-0112,0112-1), ESH-18, w/att., MS K497  
M. Alexander, ESH-18, w/att., MS K497  
ESH-DO File, w/att., MS K491  
WQ&H File, w/att., MS K497  
CRM-4, w/att., MS A150



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**Excerpts taken from the February 5, 1997 letter from Glenn Saums, NMED, SWQB, to Dennis Erickson, ESH-DO, regarding "Review Comments on Requested Information".**

- 1). "The topographical map of the 668 PRS's sites in or near watercourses proved to be a learning experience. The abundance of PRS's in one small area on one map made it difficult to delineate individual sites. Separate maps of the same scale may be a more practical way of presenting this information. This would be especially useful in presenting the location of the Voluntary Corrective Action (VCA), Expedited Cleanup, and Interim Action sites. Also, many of the PRS's in the data packet were not on the map and some of the PRS's on the map had no associated data in the data packet. "

Response

The ER Project will provide such maps for future deliverables and presentations. Currently maps exist in RFI Workplans and Reports that are at a more appropriate scale. The scale of map that you are referring to was requested in your February 8, 1996 letter. As for the PRS's on the maps and in the data packets, these inconsistencies are being corrected.

- 2). "Regarding the Table listing 668 Surface Water Phase One Potential Releases Sites:"

- a) "It would be helpful if the table included a column that lists the SRS Rank for each site."

Response

This column will be added to the current updated table.

- b) "Will this table be updated? During the review process AIP has found some PRS's and AOC's that were not listed and could be included on the update."

Response

The ER Project is currently updating this table to include additional sites identified by the AIP and SWQB. Other sites will be removed if additional information gathered since the initial query reveals no pathways or contaminants into surface waters.

- c) "What is the schedule for the "validation" of each of the 668 sites listed on this table? Currently only 92 of these sites have been "validated"."

Response

The ER Project will provide to the SWQB a schedule of anticipated dates when data sets are validated or QAed and deemed usable for decision making processes. This schedule will be provided by April 30, 1997.

- d) "What is the schedule for "validation" for the 169 of the 668 sites that have some level of investigation completed and have been recommended for NFA, the 129 sites that have existing RFI Reports and the 150 that were scheduled to be in RFI Reports by Fiscal Year 1996?"

Response

The ER Project will provide to the SWQB a schedule of anticipated dates when data sets are validated or QAed and deemed usable for decision making processes. This schedule will be provided by April 30, 1997.

- e). "To what extent does "validation" represent an environmental assessment. How will the information from ESH-18 environmental assessments be incorporated into this database."

Response

The ER Project is unsure of how you are using the word "validation". The ER Project performs validation on a percentage of its sample sets as part of a QA Program. The Water Quality and Hydrology Group's (ESH-18) Water Quality Assessment will be used at a minimum as a prioritization mechanism for the purpose of identifying sites for remediation or for interim actions. This assessment could also be used as a reference in future RFI Reports, however, this would need to be discussed further.

3. "Regarding the Table entitled "Maximum Concentrations for Phase I Potential Release Sites"."

- a) "For Volatile and Semi-Volatile constituents it would be helpful if chemical names were included with the Chemical Abstracts Service Registry Number (CAS RN)."

Response

Future reports will include chemical names instead of CAS numbers.

- b) "The current table only references 95 of the 686 sites. When will the information on the other sites be provided."

Response

The ER Project will provide to the SWQB a schedule of anticipated dates when data sets are validated or QAed and deemed usable for decision making processes. This schedule will be provided by April 30, 1997.

"In addition, review of the RFI's (submitted in boxes) revealed the following:"

- a) "Some reports describe conditions that alerted the reviewer to surface water concerns. These PRS's of concern did not always correspond to LANL's Table Listing PRS's on or near watercourses. This raises the issue of how LANL determined which PRS's were on or near a watercourse."

Response

The Laboratory identified the majority of these sites by using a keyword search of its database. Some examples of such keywords are "canyon side disposal" and "outfalls". Once this master list was generated, it was sent to field personnel for review and inclusion of missed sites.

- b) "In some reports possible surface water concerns were acknowledged and some attempt was made to address the concern. Some reports ignored any possible surface water issues because the author for determining further action or no further action (NFA) focused only on constituents regulated under RCRA. In any case, some reports have information that possibly can be used to delineate the extent of the surface water issue. This information needs to be gathered and presented in separate reports that addresses surface water issues. SWQB and LANL need to have further discussions regarding how these reports are to be written."

Response

The ER Project acknowledges that reports have been written inconsistently in the past in the area of surface water. Since heightening the awareness of the authors of these reports in the need of addressing surface water concerns, reports have been written with more attention being given to this subject. The ER Project intends, in the future, to have a section or addendum in the reports addressing surface and ground water when applicable.

- c) "Database information on the 668 sites listed in the Phase I submittal should be provided to NMED/OB for entry onto their database until LANL has resolved problems associated with FIMAD."

Response

Once the ER Project has defined a usable database and refined existing information, we will share this information, with some training on how to use it, with the NMED/OB.

"LANL also neglected to provide a prioritization and implementation plan which incorporates, at a minimum, the proximity of each site to a watercourse, the areal extent of contamination, and the likelihood of contamination mobilization and transport to a watercourse."

Response

By implementing Administrative Procedure (AP) 4.5, the ER Project is reviewing data prior to report writing. Under AP 4.5, the analytical data is provided to ESH-18 who in

turn completes a Water Quality Assessment. The Water Quality Assessment is currently being revised to include comments from NMED/OB. From this assessment the Laboratory is in fact prioritizing which sites need interim actions, BMPs or accelerated clean up. The maps that the Laboratory provided to the SWQB show the proximity to watercourses and the estimated aerial extent of contamination.

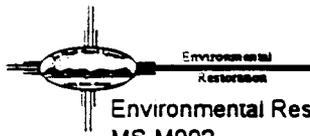
“In addition, LANL also neglected to provide a written commitment that based on the above prioritization, designs, implements and monitors (to insure effectiveness) interim Best Management Practices (BMPs) as necessary to prevent the spread of those contaminants until final remediation of the site is accomplished. Although there are indication that there has been improvement in this area, a commitment, which would be included as part of the Document of Understanding (DOU) would ensure that this approach would be consistent-wide DOE policy.”

#### Response

Attached is the commitment made by Mr. Tom Baca, Director, Environmental Management Program Office, sent to the SWQB on September 24, 1996. We believe that this memorandum indicates the EM Program's commitment to address your concerns. In addition, the DOU subjects are currently being identified and prioritized by ER Project Core Team. This Annex should be identified as a high priority by NMED's Core Team representative.

# Los Alamos National Laboratory

UNIVERSITY OF CALIFORNIA



Environmental Restoration Project  
MS M992  
Los Alamos, New Mexico 87545  
505-667-0808/FAX 505-665-4747

Date: September 24, 1996  
Refer to: EM/ER:96-507



Mr. Jim Piatt  
NMED-Surface Water Quality Bureau  
P. O. Box 26110  
Santa Fe, NM 87502

**SUBJECT: ADMINISTRATIVE PROCEDURE EVALUATION AND NOTIFICATION OF POTENTIAL SURFACE AND GROUND WATER CONCERNS AT ER SITES, LANL-ER-AP-4.5, R0**

Dear Mr. Piatt:

Los Alamos National Laboratory's Environmental Management Division (EM) is committed to protecting the State's water quality. In order to assure that this occurs, the Environmental Restoration (ER) Project has been developing procedures and heightening their personnel's awareness to address your Bureau's concerns. To address the potential water quality issues associated with ER sites, the ER Project has developed the enclosed Administrative Procedure, LANL-ER-AP-4.5, R0, entitled "Evaluation and Notification of Potential Surface and Ground Water Concerns at ER Sites." This procedure allows for a systematic evaluation of ER site data and a follow-up evaluation of the site, to be performed by the Laboratory's Water Quality/Hydrology Group. The process will help identify sites that need immediate water quality corrective actions as well as prioritize other sites without the urgency associated with them.

The ER Project is enhancing their surface water protection involvement through other processes as well. Some of them include hiring a full-time water quality expert, supplying water quality training for ER personnel, and meeting monthly with members of your staff to discuss water quality issues.

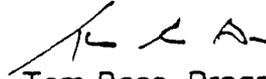
The Project also implements numerous stormwater and best management practices at their sites. ER also has personnel sitting on the newly developed, Laboratory-wide, Watershed Management Task Force.

EM Division is committed to protect the environment and will continue to find ways to improve and implement processes to assure that State of New Mexico waters are not adversely affected by our mission.

September 24, 1996

Should you have any questions regarding the procedure, please contact David McInroy of the ER Project at 505-667-0819.

Sincerely,



Tom Baca, Program Director  
Environmental Management

TB/DM/rfr

Enclosure: LANL-ER-AP-4.5. R0

Cy: D. Erickson, ESH-DO, MS K491  
J. Jansen, EM/ER, MS M992  
D. McInroy, EM/ER, MS M992  
S. Ray, ESH-18, K497  
T. Todd, LAAO, MS MS A316  
EM/ER, MS M992  
RPF, MS M707