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MARK E. WEIDLER
SECRETARY

April 24, 1997

Mat Johansen, DOE AIP POC
U. S. Department of Energy
Los Alamos Area Office, MS A316
Los Alamos, New Mexico 87544

RE: Review of two Los Alamos National Laboratories "Requests for Permit Modification Units Proposed for NFA" dated March and September 1995.

Dear Mr. Johansen:

The DOE Oversight Bureau (DOE OB) has reviewed the subject documents. The attached comments are provided for the purpose of communicating the results of the review. They are not provided or intended for the purpose of representing the regulatory position of the New Mexico Environment Department.

Only Areas Of Concern included in the Requests were reviewed. Comments on HSWA sites included in the Requests were transmitted in a letter from Steve Yanicak to Benito J. Garcia dated March 5, 1996.

Because some comments apply to many sites, a general comment section is provided which lists comments that are made repeatedly. The sites included in the specific comments are not considered by the DOE OB to be suitable for NFA for the reasons stated. In large part, sites were considered not suitable because documented information or sampling results were not available in the requests. In some cases, it appeared that additional investigation or sampling is warranted. The specific comments section may contain comments specific to a site or may refer back to a general comment.

If there are any questions, please contact me at 505-672-0448 or Chris Hanlon-Meyer of the DOE Oversight Bureau Technical Support staff at 505-827-1536.



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Sincerely,



Stephen Yanicak, LANL POC
Department of Energy Oversight Bureau

SY:CHM:chm

Attachment

cc w/o attachment:

J. Parker, NMED, Chief, DOE Oversight Bureau

cc w/ attachment:

~~_____~~, NMED, Chief, HRMB
G. Saums, NMED, Program Manager, SWQB
D. Duran, NMED, Chief, USTB
T. Taylor, DOE, Program Manager, EM/ER, MS A316
B. Koch, DOE, FU1 FPC, MS A316
E. Trollinger, DOE, FU2 & FU4 FPC, MS A316
B. Simeone, DOE FU4 FPC, MS A316
M. Gilgosh, DOE, FU5 FPC, MS A316
J. Mose, DOE, FU6 FPC, MS A 316
J. Jansen, LANL, Project Manager, EM/ER, MS M992
T. Glatzmaier, LANL, EM/ER, MS M992
G. Allen, LANL, FU1 FPL, MS D462
G. Gould, LANL, FU2 FPL, MS G787
B. Martin, LANL, FU3 FPL, MS E525
A. Pratt, LANL, FU4 FPL, MS J521
D. Krier, LANL, FU5 FPL, MS D462
M. Salazar, LANL, FU6 FPL, MS M773

**Review of
Requests for Permit Modification Units Proposed for NFA
Los Alamos National Laboratory, March and September 1995**

General Comments on the March 1995 Request:

1. Documented information including a description of operations, operational dates, estimated waste volumes, existing or proposed engineering controls, and sampling or screening results, should be provided. Although this information may be included in the RFI Workplan or in other reports, it should be summarized in the request.
2. Documents referenced in the Request should be available to the public, without difficulty. The reference section should include all documents which are referenced in the Request for Permit Modification. It might be useful to indicate whether the document is available in the Public Reading Room or the Environmental Restoration Records Center.
3. Inactive and/or abandoned septic tanks should be filled with clean material to eliminate the chance of a person falling through the cover and to prevent the tanks from being used for unwanted disposal of materials.
4. For inactive and/or abandoned drain lines and outfalls the pipe should be removed and any trenching should be backfilled to eliminate the potential for future use of the drain system.
5. Details should be provided on engineering controls at sites proposed for NFA based on no release to the environment due to engineering controls.
6. Documented information regarding results of any site survey or sampling should be included in the request.
7. This site should be considered for further evaluation under RCRA/HSWA.
8. Sampling should be conducted at this site. Depending on the results of the sampling, the site should be added to Table A of the HSWA Module of the RCRA Permit.
9. Documented information should be provided regarding the approved closure. The administrative authority for the closure should be named and the approval document should be fully referenced.

10. The history of this site including contamination/remediation information should be recorded in a deed notice or deed restriction.

Specific comments on March 1995 Request

1. § 2.2.3.1, Page 2-28, PRS 0-015, Firing Range, OU 1114.

See comment #7 and 8.

2. § 2.2.4.2, Page 2-92, PRS 0-040, Underground tank, OU 1071.

See general comment #9.

3. § 2.2.4.6, Page 2-93, PRS 1-007(f), Soil Contamination Area, OU 1078.

"A small spot of uranium was found in a surface sample near the west end of the Delta Building during remediation effort in the mid 1970s."

See general comment #10.

4. § 2.2.1.2.1, Page 2-40, PRS 1-007(g), Soil Contamination Area, OU 1078.

"Streaks of yellowish-green uranium oxide were found at a depth of approximately 10 inches."

See general comment #10.

5. § 2.2.4.7, Page 2-94, PRS 1-007(h), Soil Contamination Area, OU 1087.

" Two thin horizontal veins of uranium contamination (4 to 8 inches thick) remained north of the former TU-1 Building. These veins were...approximately 4 to 10 feet below the restored ground surface. These veins were not completely removed during the excavation..."

See general comment # 10.

6. § 2.2.4.8, Page 2-95, PRS 1-007(I), Soil Contamination Area, OU 1078.

"...three areas of subsurface uranium contamination were

discovered in the vicinity of former Warehouses 5,6, and GR. Approximately 503 cubic yards of soil were removed from these areas, in addition to a 34-pound cylinder of natural uranium."

See general comment #10

7. § 2.2.4.9, Page 2-95, PRS 1-007(m), Soil Contamination Area, OU 1078.

"..area of suspected subsurface soil contamination consisting of the former C Building footprint."

See general comment #1 and 6.

8. § 2.2.4.12, Page 2-96, PRS 1-007(p), Soil Contamination Area, OU 1078.

"...an outcrop of tuff south of the former HT Building exhibited elevated levels of alpha activity. Exploration showed that the activity extended over a wide shallow area."

See general comment #10.

9. § 2.2.1.24, Page 2-41, PRS 3-010(d), Operational Release, OU 1114.

See general comment #1 and 6.

10. § 2.2.1.25, Page 2-41, PRS 3-013(d), Operational Release, OU 1114.

"Inspection of the area also found an oil stain that extends about 35 ft southeast of the shearer. Storm runoff from this area flowed southeast toward the storm drain..."

See general comment #1 and 6.

11. § 2.2.1.26, Page 2-42, PRS 3-013(e), Operational Release, OU 1114.

" In March 1989 an estimated 60 gal. of a 50/50 mix of ethylene glycol and water spilled...on the pavement west of TA-3-36. Most of the solution drained into a storm drain..."

See general comment #6.

12. § 2.2.1.28, Page 2-42, PRS 3-013(g), Operational Release OU

1114.

"For at least 10 years (1978 to 1988), the dumpster was used for disposal of oil-soaked Sorb-all. Spills occurred...and oil stains were evident on the soil...."

See general comment #7.

13. § 2.2.4.14, Page 2-97, PRS 3-020(b), Surface Disposal Site, OU 1114.

See general comment #1.

14. § 2.2.1.30, Page 2-43, PRS 3-055(b), Outfall, OU 1114.

See general comment #4.

15. § 2.2.2.4, Page 2-69, PRS 6-003(b), Firing Site, OU 1111

See general comment #1 and 6.

16. § 2.2.1.32, Page 2-44, PRS C-6-20, Building, OU 1111

See general comment #1 and 5.

17. § 2.2.2.8, Page 2-70, PRS 8-008(d), Storage Area, OU 1129

See general comment #7.

18. § 2.2.1.34, Page 2-44, PRS C-8-001, Building, OU 1157

This site should remain as an AOC pending the results of the RFI investigation at 8-002.

19. § 2.2.4.23, Page 2-99, PRS C-9-007, Buildings, OU 1157

This site should remain an AOC pending the results of the investigation of the Group 5, TA-9 Decommission Area, Phase I sampling of surface and subsurface soils throughout the Old Anchor East Decommissioned Area.

20. § 2.2.1.53, Page 2-49, PRS C-9-010, Burn Site, OU 1157

See specific comment #19.

21. § 2.2.1.51, Page 2-48, PRS 9-015, Manhole, OU 1157

See general comment #1.

22. § 2.2.4.17, Page 2-98, PRS 9-016, Underground Tank, OU 1157.

See general comment #1 and 6.

23. § 2.2.4.18, Page 2-98, PRS C-9-002, Buildings, OU 1157

See specific comment #19.

24. § 2.2.4.21, Page 2-99, PRS C-9-005, Building, OU 1157

This site should remain an AOC pending the results of the Group 6, PRSs 9-001(a and b) phase one sampling of surface and subsurface soils in the Far Point area.

25. § 2.2.4.22, Page 2-99, PRS C-9-006, Buildings, OU 1157

See specific comment #19.

26. § 2.2.1.54, Page 2-49, PRS C-9-011, Burn Site, OU 1157

See specific comment #19.

27. § 2.2.1.55, Page 2-49, PRS 10-001(e), Detonation Test Area, OU 1079.

See general comment #6.

28. § 2.2.1.57, Page 2-50, PRS 11-010(b), Container Storage Area, OU 1082.

See general comment #6.

29. § 2.2.4.24, Page 2-99, PRS C-11-003, One Time Release (La-140, Sr-90), OU 1082.

See general comment #6, 7.

30. § 2.2.1.64, Page 2-52, PRS 15-009(d), Septic Tank, OU 1086.

See general comment #1 and 3.

31. § 2.2.1.67, Page 2-52, PRS 15-014(c), Industrial or Sanitary Wastewater Treatment, OU 1086.

See general comment #1 and 7.

32. § 2.2.1.68, Page 2-53, PRS C-15-002, Surface Disposal, OU 1086.

See general comment #7.

33. § 2.2.3.7, Page 2-87, PRS 16-012(a2), Container Storage, OU 1082.

See general comment #1.

34. § 2.2.4.26, Page 2-101, PRS 18-009(a), Transformer, OU 1093.

See general comment #9.

35. § 2.2.2.16, Page 2-72, PRS 18-009(c), Transformer, OU 1093.

See general comment #9.

36. § 2.2.2.17, Page 2-73, PRS 18-009(d), Transformer, OU 1093.

See general comment #9.

37. § 2.2.2.18, Page 2-73, PRS 18-009(e), Transformer, OU 1093.

See general comment #9.

38. § 2.2.2.19, Page 2-74, PRS C-18-002, Building, OU 1093.

See general comment #1 and 3.

39. § 2.2.3.8, Page 2-87, PRS C-18-003, Storage Area, OU 1093.

See general comment #1.

40. § 2.2.2.22, Page 2-76, PRS 21-028(e), Container Storage, OU 1106.

See general comment #7.

41. § 2.2.4.28, Page 2-101 through 104, PRSs C-21-002, C-21-003, C-21-004, C-21-008, C-21-010, C-21-011, C-21-015, C-21-016, C-21-017, C-21-018, C-21-019, C-21-020, C-21-021, C-21-022, C-21-023, C-21-024, C-21-025, C-21-026, C-21-028, C-21-029, and C-21-030, OU 1106.

See general comment #1.

42. § 2.2.1.74, Page 2-54, PRS C-21-013, Drain Line, OU 1106.

Additional documentation should be included regarding the engineering records that indicated that construction of the pit was canceled.

See general comment #1.

43. § 2.2.1.75, Page 2-54, PRS C-21-014, Warehouse, OU 1093.

See general comment #1.

44. § 2.2.2.23, Page 2-76, PRS C-32-001, Buildings, OU 1079.

See general comment #1.

45. § 2.2.1.79, Page 2-56, PRS 33-004(i) Outfall, OU 1122.

See general comment #1, 4.

46. § 2.2.3.9, Page 2-87, PRS 33-012(b, c, d), Satellite Storage, OU 1122.

See general comment #1.

47. § 2.2.2.24, Page 2-77, PRS 35-001, Material Disposal Area, OU 1129

See general comment #1, 5 and 8.

48. § 2.2.2.26, Page 2-77, PRS 35-004(d,f,k,l,n), Container Storage Area, OU 1129

See general comment #5

49. § 2.2.4.30, Page 2-104, PRS 35-005(a and b), Surface Impoundment, OU 1129

See general comment #9

50. § 2.2.1.82, Page 2-56, PRS C-35-005 and C-35-006, Operational Release, OU 1129

See general comment #6.

51. § 2.2.2.29, Page 2-78, PRS C-35-008, Leaking Transformer, OU 1129

See general comment #5.

52. § 2.2.3.10, Page 2-88, PRS 35-011(b), Underground Storage Tank, OU 1129.

See general comment #6 and 9.

53. § 2.2.2.28, Page 2-78, PRS 35-011(c), Underground Storage Tank, OU 1129.

See general comment #1.

54. § 2.2.4.31, Page 2-104, PRS 35-011(d), Underground Storage Tank, OU 1129.

See general comment #1 and 9.

55. § 2.2.4.32, Page 2-105, PRS 35-012(a), Underground Storage Tank, OU 1129

See general comment #9.

56. § 2.2.4.33, Page 2-106, PRS 35-017, Soil Contamination, OU 1129

See general comment #6.

57. § 2.2.1.83, Page 2-57, PRS 36-003(d), Septic System, OU 1130.

See general comment #1.

58. § 2.2.2.31, Page 2-79, PRSs 36-007(a, b, c, d, e, and f), Storage Areas, OU 1130.

See general comment #5.

59. § 2.2.2.32, Page 2-79, PRS 39-002(g), Storage Area, OU 1132.

See general comment #1 and 5.

60. § 2.2.1.86, Page 2-57, PRS 39-007(b), Storage Area, OU 1132.

See general comment #1 and 5.

61. § 2.2.2.33, Page 2-79, PRS 39-007(c), Storage Area, OU 1132.

See general comment #1 and 5.

62. § 2.2.1.90, Page 2-58, PRS C-41-003, Underground Tank, OU 1098.

See general comment #1 and 6.

63. § 2.2.1.91, Page 2-59, PRS C-41-005, Underground Tank, OU 1098.

See general comment #1 and 6.

64. § 2.2.4.36, Page 2-106, PRS 42-004, Canyon Disposal, OU 1129

Sample results for TCLP analysis are not appropriate for justification for NFA. Appropriate methods should be utilized for analysis of soil, sediment and surface water associated with this site. Additionally, New Mexico Water Quality Control Commission standards for material in a water course may apply at this site.

See general comments #6 and 7.

65. § 2.2.1.92, Page 2-59, PRS 43-001(b1), Outfall, OU 1136.

This sink drain should be hooked up to the sanitary sewer system before NFA is approved. Surface soil/sediment samples may need to be taken from the sink drain line outfall and analyzed for metals, VOCs, SVOCs, and radionuclides.

See general comment 4 and 6.

66. § 2.2.3.11, Page 2-88, PRS 46-001, Aboveground Tank, OU 1040.

See general comment #1.

67. § 2.2.1.95, Page 2-60, PRS 46-004(i,j,k,l,n,o), Outfalls, OU 1140.

See general comment #1, 4.

68. § 2.2.1.97, Page 2-61, PRS 46-008(misc), Storage Areas, OU 1040.

See general comment #1.

69. § 2.2.3.12, Page 2-88, PRS 46-010(a), Storage Area, OU 1140.

See general comment #1.

70. § 2.2.3.13, Page 2-88, PRS 46-010(b), Storage Area, OU 1140.

See general comment #1.

71. § 2.2.3.14, Page 2-89, PRS 46-010(c), Storage Area, OU 1140.

See general comment #1.

72. § 2.2.3.15, Page 2-89, PRS 46-010(e), Storage Area, OU 1140.

See general comment #1.

73. § 2.2.3.16, Page 2-89, PRS 46-010(f), Storage Area, OU 1140.

See general comment #1.

74. § 2.2.1.97, Page 2-61, PRS 46-010(misc), Storage Area, OU
1140.

See Comment # 1.

75. § 2.2.2.36, Page 2-61, PRS 48-002(d), Container Storage
Area, OU 1129

See general comment #5.

76. § 2.2.1.98, Page 2-61, PRS 48-004(d) Sumps and Tanks, OU
1129.

See general comment #3 and 6.

77. § 2.2.2.37, Page 2-81, PRS 48-008, Transformer Leak, OU 1129

See general comment #5.

78. § 2.2.3.17, Page 2-89, PRS 50-003(c), Storage Area, OU 1147

See general comment #1.

79. § 2.2.2.39, Page 2-81, PRS 50-005, Waste Treatment Facility,
OU 1147

See general comment #1 and 5.

80. § 2.2.1.101, Page 2-61, PRS 51-002(a), Usage Site, OU 1148

The report should include documented information regarding the nature of the tracer chemicals used at this site. Information may be needed on the concentrations of these tracers in the "land that sloped off the mesa to Cañada del Buey."

See general comment #1.

81. § 2.2.1.103, Page 2-62, PRS 52-002(g) Outfall, OU 1129.

See general comment #3.

82. § 2.2.4.39, Page 2-107, PRS 52-003(b), Industrial Waste Line, OU 1129

See general comment #6.

83. § 2.2.2.41, Page 2-82, PRS 54-015(g), Storage Area, OU 1148

See general comment #1.

84. § 2.2.4.40, Page 2-107, PRS 54-021, Aboveground Tanks (6), OU 1148

See general comment #9.

85. § 2.2.4.41, Page 2-107, PRS 54-022, Transformer Spill (PCB), OU 1148

See general comment #6 and 9.

86. § 2.2.2.45, Page 2-83, PRS 55-002(a and b), Rad Waste Storage Area, OU 1129

See general comment #5.

87. § 2.2.2.48, Page 2-84, PRS 55-013(a and b), Storage Area, OU 1129

See general comment #5.

88. § 2.2.1.114, Page 2-65, PRS 60-004(a), Storage Area, OU 1114.

See general Comment #6.

89. § 2.2.1.116, Page 2-66, PRS 60-006(b and c) Septic System,

OU 1114.

See general comment #3.

90. § 2.2.1.119, Page 2-66, PRS 69-002(a) Septic System, OU 1157.

See general comment #3.

Specific comments on September 1995 Request

1. § 2.2.2.1, Page 2-35, Site 3-013(c), Operational Release, OU 1114.

"The outfall was sampled in 1994, associated with SWMUs 3-013(a,b); no contamination was found."

See general comment #6.

2. § 2.2.2.2, Page 2-35, PRS C-4-001, Former Building Location, OU 1129.

See general comment #1 and 6.

3. § 2.2.4.1, Page 2-49, PRS 5-006(a), Former Building Location, OU 1129.

See general comment #1, and 6.

4. § 2.2.2.3, Page 2-36, PRS 5-006(d), Former Building Location, OU 1129.

See general comment #1.

5. § 2.2.2.4, Page 2-36, PRS 5-006(f and g), Former Building Location, OU 1129.

See general comment #1.

6. § 2.2.1.1, Page 2-23, PRS C-5-001, Former Building Location, OU 1129.

Information gathered as part of the OU 1129 RFI Work plan for SWMU No. 5-001(a) should be reviewed and documented prior to consideration for NFA.

See general comment #1, 5 and 6.

27. § 2.2.2.17, Page 2-40, PRSs C-53-001 through C-53-019, 53-011(a,b,c,d,e), Transformers, OU 1100.

See general comment #9.

28. § 2.2.2.23, Page 2-41, PRS 55-002(c), Container Storage, OU 1129.

See general comment # 5.

29. § 2.2.1.42, Page 2-33, PRS 61-004(b) Septic Tank, OU 1114.

See general comment #3.

30. § 2.2.1.26, Page 2-42, PRS 63-002, Container Storage Area, OU 1129.

See general comment #1 and 5.

If there are any questions about this review, please contact Steve Yanicak at 505-672-0448 or Chris Hanlon-Meyer of the DOE Oversight Bureau Technical Support staff at 505-827-1536.

Document reviewed by: Steve Yanicak, Martyne Kieling, Chris Hanlon-Meyer, and Ralph Ford-Schmid.

7. § 2.2.3.3, Page 2-43, PRS 14-004(a,c), Storage Area, OU 1085.

See general comment #1.

8. § 2.2.3.5, Page 2-44, PRS C-15-013, Underground Tank, OU 1086: "...tank is not in use and ethylene glycol is not regulated under RCRA."

See general comment #9.

9. § 2.2.1.6, Page 2-24, PRS C-16-003 Septic System, OU 1082.

See general comment #1 and 3.

10. § 2.2.1.13, Page 2-26, PRS C-16-027, Building, OU 1082.

See general comment #1.

11. § 2.2.1.14, Page 2-26, PRS C-16-029, Building, OU 1082.

See general comment #1.

12. § 2.2.1.16, Page 2-27, PRS C-16-033, Warehouse, OU 1082.

See general comment #1.

13. § 2.2.1.23, Page 2-29, PRS C-16-045, Manhole, OU 1082.

See general comment #1.

14. § 2.2.4.3, Page 2-49, PRS 21-004(d), Drain Line, OU 1106.

See general comment #4.

15. § 2.2.2.6, Page 2-37, PRS 35-004(I), Container Storage Area, OU 1129.

See general comment #1 and 7.

16. § 2.2.1.36, Page 2-32, PRS 35-004(j), Container Storage Area, OU 1129.

See general comment #1 and 7.

17. § 2.2.2.7, Page 2-37, PRS 35-004(o), Container Storage Area, OU 1129.

See general comment #1.

18. § 2.2.1.37, Page 2-32, PRS 35-014(c), Operational Release, OU 1129.

See general comment #1 and 8.

19. § 2.2.2.8, Page 2-37, PRS 35-018(b), Former Transformer PRS, OU 1129.

See general comment #5.

20. § 2.2.2.9, Page 2-37, PRS C-35-001, C-35-002, C-35-003, Former UST PRS, OU 1129.

See general comment #1.

21. § 2.2.4.9, Page 2-52, PRS C-35-004, Operational Release, OU 1129.

The request should include the documentation related to the cleanup. See general comment #1, 6 and 9.

22. § 2.2.1.38, Page 2-32, PRS 48-007(e), Outfall, OU 1129.

See general comment #6, 7 and 8.

22. § 2.2.2.10, Page 2-38, PRS 48-002(c), Container Storage Area, OU 1129.

See general comment #1 and 6.

23. § 2.2.2.11, Page 2-38, PRS C-52-001 and C-52-002, Former Transformer PRS, OU 1129.

See general comment #1 and 7.

24. § 2.2.2.12, Page 2-38, PRS 53-001(d), Storage Area, OU 1100.

See general comment #1, 5 and 6.

25. § 2.2.2.16, Page 2-39, PRS 53-001(j), Storage Area, OU 1100.

See general comment #1, 5 and 6.

26. § 2.2.2.18, Page 2-40, PRS 53-001(l), Storage Area, OU 1100.