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Stu

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SECRETARY

May 15, 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 Los Alamos National Laboratories "Requests for Permit Modification Units Proposed for NFA" Volumes I and II dated September 1996.

Dear Mr. Johansen:

The DOE Oversight Bureau (DOE OB) has reviewed the subject document. 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 Solid Waste Management Units included in the Request are included in this review. Comments on Areas of Concern included in the Request will be transmitted in a subsequent letter.

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 a some cases, it appeared that additional investigation or sampling is warranted.

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.

Sincerely,

Stephen Yanicak

Stephen Yanicak, LANL POC
Department of Energy Oversight Bureau



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Mat Johansen
Review of NFA Proposal September 1996
May 15, 1997

SY:CHM:chm

Attachment

cc w/o attachment:

J. Parker, NMED, Chief, DOE Oversight Bureau

cc w/ attachment:

B. Garcia, 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
Request for Permit Modification Units Proposed for NFA
Los Alamos National Laboratory, September 1996

Specific comments

1. **§ SWMU 3-045(a), NPDES Permitted Outfall (Inactive)**

The attachments provided for this SWMU are helpful, but do not include confirmatory results after the cleanup of the diesel oil spill referred to in the text. The letter from the NMED SWQB to Bellows and Tienon stating that "NMED considers this letter as documentation for closing the files on these spills" does not suggest that SWMU 3-045(a) was remediated according to RCRA/HSWA. It states that the spill report was "administratively complete." Additional information should be provided as to the discharges prior to the installation of the oil sump. Were there discharges into the canyon that may have occurred prior to the installation of the sump? The proposal should list all of the contaminants of concern and concentrations detected in the canyon soil/sediment and surface water. Because the outfall was used for many years, potential COCs from this SWMU may extend further than the extent of the diesel oil spill.

2. **§ SWMU 3-045(e), Outfall (Inactive).**

For inactive and/or abandoned drain lines and outfalls the pipes should be removed and any trenching should be backfilled.

3. **§ SWMU 3-045(g), Outfall (Inactive).**

Additional information should be included on the types of metals quenched after welding and cutting operations. Metal slag produced as a byproduct of welding and cutting, and grease cutting agents that may have been used during hand washing should be considered as possible sources of COCs.

Comment #2.

4. **§ SWMU 3-045(h), NPDES Permitted Outfall (Active).**

Potential chemicals of concern resulting from cooling tower water treatment should be investigated in the soil/sediment below the outfall.

5. **§ SWMU 3-049(c), Outfall, (Active).**

Additional information should be included regarding the two condensate outfalls mentioned in the SWMU Report. Attachment B also mentions two outfalls, 20 feet apart. The request should clarify the location of the two outfalls. It does not appear that this is a duplicate of 3-049(d). It appears that there are two separate condensate outfalls.

6. **§ SWMU 3-049(d), Outfall, (Active).**

See comment #5.

7. **§ SWMU 3-050(a), Potential Soil Contamination From Active Exhaust Stack Emissions.**

The request should document the location and results of soil samples taken around TA-3.

8. **§ SWMU 3-050(d), Potential Soil Contamination From Active Exhaust Stack Emissions.**

See comment #7.

9. **§ SWMU 3-050(g), Potential Soil Contamination From Active Exhaust Stack Emissions.**

See comment

10. **§ SWMU 3-052(c), One Time Release.**

See comment #1 regarding the need for confirmatory sample results after cleanup of the oil spill at 3-045(a).

11. **§ SWMU 3-54(a), Outfall (Decommissioned)**

The request should include documented information showing that chromates or other cooling tower water treatment chemicals were not used. Also, documented information should be included to show the location of the decommissioned outfall pipe. The decommissioned outfall pipe should be

removed.

12. § SWMU 3-54(d), Outfall (Active)

The request states that "there is no history of chromate use at the TA-3-16 and TA-3-19 cooling towers (LANL 1993, 17-932)." The referenced document states that according to Bill Radzinski of ENG-6, "it is highly unlikely that chromates were used during cooling tower operation." If documentation is not available to fully support the statement that chromates were not used at the site, samples should be collected to show that there was no release of this substance.

13. § SWMU 3-55(a), Outfall (Active)

Additional information should be included regarding the use of Room 68. The request states that it is a generator room but does not discuss the type of generator. Is it a waste generator room? We suggest that DOE remove or plug the drain in room 68.

14. § SWMU 3-56(a), Drum Storage Area (Active)

Additional information should be included to show the construction and maintenance history of the sump. Were hazardous materials ever discharged to the sump? Has the sump ever leaked hazardous materials into the environment? Documentation should be included.

15. § SWMU 3-001(c), Sump

Additional information should be included regarding the construction of the sump. Does the sump discharge to the environment? If discharges from the sump have occurred, sampling at and below the point of discharge should be conducted.

If there are any questions about this review, please contact [redacted] at 505-672-0448 or Chris Hanlon-Meyer of the DOE Office of Environmental and Technical Support staff at 505-827-1536.

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