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**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

June 9, 1997

Mr. Jorg Jansen, Program Manager  
Environmental Restoration Project  
Los Alamos National Laboratory  
1900 Diamond Drive, Mail Stop M992  
Los Alamos, New Mexico 87544

Mr. Theodore J. Taylor, Program Manager  
Department of Energy  
Los Alamos Area Office  
528 35th Street, Mail Stop A316  
Los Alamos, New Mexico 87544

**RE: Notice of Determination; Notice of Deficiency and Approval  
Requests for Permit Modification  
Units Proposed for No Further Action  
September 1996  
Los Alamos National Laboratory**

Dear Mr. Taylor and Mr. Jansen:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has completed its review of the Hazardous and Solid Waste Amendment (HSWA) units proposed for no further action (NFA), September 1996 Request for Permit Modification. The Request recommends NFA for a total of 42 HSWA units. The NMED DOE Oversight Bureau provided technical comments which were considered in the review of this proposal.

Attachment A is a listing of all units for which NFA recommendations are deemed deficient by NMED HRMB and require the submittal of additional information. Several deficiencies in the proposals were noted and are enclosed for your review and action.

Please submit changes to this No Further Action Proposal document in response to the deficiencies noted within thirty (30) calendar days of receipt of this letter. These changes should be provided in the form of replacement pages and/or addendums to the subject document.



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Mr. Taylor and Mr. Jansen  
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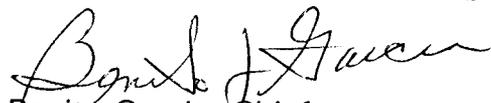
Attachment B is a listing of those units which are suitable candidates for NFA proposal. DOE/LANL shall begin the permit modification requirements for the units that are suitable candidates for NFA. Also, please initiate the Class III permit modification for those solid waste management units which are pending approval upon public comment. Requirements for a Class III modification are contained in 20 NMAC 4.1, Subpart IX, 40 CFR 270.42(c).

NMED HRMB provides the following general comments on the Request for Permit Modification:

1. All documents cited in the text should be readily available to the public. Providing an indication of where the document may be found (i.e., Public Reading Room or the Environment Restoration Records Center) would be helpful to the reader.
2. When engineering drawings or plans are provided as supporting documentation, the Potential Release Sites (PRSs) in question and other PRS's found in the area should be highlighted in the supporting documentation. The drawings should also be consistent with the text (e.g. - structures, such as rooms, tanks, drainlines, etc., should be identified on the drawing(s) when indicated in the text).
3. When "regulations" or "managed under another authority" are mentioned indicate the regulations and the regulatory authority involved with the PRS.
4. Provide a quadrant map for those PRS's which did not include one. The map should indicate the location of the PRS and any associated PRS's. For future NFA submittals a location map (i.e., Fig. 1-1, 1-2) could be referenced once instead of multiple times for each PRS. If several PRS's are located within a technical area(s) a plate(s) could be submitted indicating the PRS's submitted for NFA.
5. This NFA submittal is much improved from past NFA submittals.

Should you or your staff have any questions concerning this Notice of Determination, please contact either myself or Mr. John Kieling at (505) 827-1561.

Sincerely,



Benito Garcia, Chief

Hazardous and Radioactive Materials Bureau

BG:jek

attachments

cc: R. Dinwiddie, NMED HRMB  
T. Davis, NMED HRMB  
J. Kieling, NMED HRMB  
T. Glatzmaier, DDEES/ER, MS M992  
E. Kelley, NMED SWQB  
M. Leavitt, NMED GWQB  
D. McInroy, EM/ER, MS M992  
D. Neleigh, EPA Region VI, 6PD-N  
J. Vozella, LAAO, MS A316  
J. Parker, NMED DOE OB  
S. Yanicak, NMED DOE OB, MS J993  
File: HSWA LANL G/P 97  
Track: LANL, 6/9/97, na, DOE/LANL, HRMB/jek, RE, File

**ATTACHMENT A**  
**September 1996 Request for Permit Modification**

**Solid Waste Management Units Proposed for NFA Which Are Not Suitable and Require the Submittal of Additional Information**

PRS	Description	OU	NFA Criterion	NMED Comment
<b>September 1996 Request for Permit Modification: Units Proposed for NFA</b>				
3-002(a)	Container Storage Area	1114	4	Indicate the the dates of operation of this PRS. Provide a response letter from EPA concurring with the July 13, 1992, DOE letter regarding satellite and less-than-ninety-day hazardous waste accumulation areas.
3-002(d)	Container Storage Area	1114	2	Provide documentation as to whether the asphalt was in place concurrent with drum storage or if it was paved afterwards (if paved afterwards, visual inspection for "obvious stains" is useless). Indicate if photo 312 is associated with PRS 3-002(d) and which PRS if not. Please clarify: the description for photo 314 indicates that spills were present at this PRS, while section 1.2 (also R. Gallegos, Attachment A) indicates no historical releases occurred.
3-009(i)	Surface Disposal Site	1114	2	Provide a Sampling and Analysis Plan to indicate confirmation that hazardous waste was not disposed at this site.
3-009(j)	Surface Disposal Site	1114	2	Provide a Sampling and Analysis Plan to indicate confirmation that hazardous waste was not disposed at this site.
3-019	Septic Tank	1114	2	Indicate when the Acid and Sanitary sewer lines were put into use at this PRS. Attachment A, indicates that the septic tank was used from 1950 to 1964, and also, states that "another report indicates that the tank was included as a component of the waste line." Provide this report and any supporting information. Also provide information, indicating when buildings TA-3-16, -17, -18 were put into operation.
3-025(a)	Tank and/or Associated Equipment (Oil Trap Sump)	1114	1	Provide the reference of Bohn (1989, 17-883), indicated as being Attachment B within section 1.2. The Attachment B provided is referenced as HSE 8-89-758, Bohn, 1989, and does not indicate that a oil trap sump does not exist. Indicate on Attachment C, ENG-C 17883, the location of rooms B-10 and B-11. Also, indicate the location where the drainlines exit the building.

PRS	Description	OU	NFA Criterion	NMED Comment
3-026(b)	Sumps (Active)	1114	3	Provide additional information demonstrating the integrity of this unit indicating that no release to the environment has occurred.
3-031	Tank and/or Associated Equipment (Radioactive Liquid Waste System)	1114	3	Provide additional information demonstrating the integrity of this system before and after the tank upgrade that no release to the environment has occurred. Highlight on the engineering drawing, ENG-C 8006, the location of the tanks and associated lines and vaults.
3-032	Tank and/or Associated Equipment (Recirculation Tank)	1114	3	Provide additional information demonstrating the integrity of this unit indicating that no release to the environment has occurred.
3-043(c)	Tank and/or Associated Equipment (decommissioned tank)	1114	5	Provide a drawing(s) indicating sampling locations and a summary of the results for the soil within the trench of which the pipe connecting to the manhole (TA-3-718) was located. Indicate if the soil was sampled for metals, VOCs, and SVOCs in addition to the radionuclides and, if so, provide a summary of the results.
3-044(a)	Container Storage Area	1114	3	Indicate when the site was initially and last used and if the site is to be used as a less than 90-day storage area in the future. Also, provide information indicating if the site has always been concreted and if the site was used for storage of other materials prior to the storage of materials/waste as indicated in the Proposal.
3-045(a)	NPDES Permitted Outfall (Inactive)	1114	4	Provide a summary of the confirmatory sampling results for the diesel oil spill. The letter to Bellows and Tiedman from NMED/SWQB, Attachment F, states "NMED considers this letter as documentation for closing the files on these spills" and does not suggest that SWMU 3-045(a) was remediated according to RCRA/HSWA. The letter 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. Indicate if there were any discharges into the canyon that may have migrated prior to the installation of the sump. The proposal should include a complete list of the contaminants of concern and concentrations detected in the canyon soil/sediment and surface water. Since this outfall was used for many years, potential COCs from this SWMU may extend further than the extent of the diesel oil spill.

PRS	Description	OU	NFA Criterion	NMED Comment
3-045(e)	Outfall (Inactive)	1114	3	Indicate how the drainline was plugged. Provide a Sampling and Analysis Plan to confirm that a release has not occurred at the outfall. HRMB, also recommends that the drainline and outfall be removed and that the trenching be backfilled. Attachment B does not indicate that the staining is from organic matter. The memo (Attachment B) states that the concrete apron and the soils just beneath the surface of the drain pipe appear to be stained with oil.
3-045(f)	Outfall (Inactive)	1114	2	Additional information should be included on the types of metals quenched after welding and cutting operations. Metal slag produced as a byproduct of metal welding and cutting, in addition to grease cutting agents that may have been used during hand washing should be considered as potential sources of COCs. HRMB recommends that the drainline be removed and the trenching be backfilled.
3-045(h)	NPDES Permitted Outfall (Active)	1114	2	Additional information as to the cooling tower treatment chemicals should be investigated in the soil/sediment below the outfall.
3-045(i)	Outfall (Active)	1114	2	Provide additional information indicating if any hazardous materials were stored in the parking area. The drawings, Attachments B and C, should indicate where Room B-10 is located with regard to the explanation within Attachment E.
3-049(c)	Outfall (Active)	1114	1	Additional information should be provided regarding the two condensate outfalls mentioned in the SWMU Report. Attachment B also mentions two outfalls, 200 feet apart. The request should clarify the location of the two outfalls. It does not appear that this is a duplicate site to 3-049(d). It appears that there are two separate condensate outfalls. Provide a plan or map indicating the association of the two PRS's.
3-049(d)	Outfall (Active)	1114	2	See PRS 3-049(c) comments.
3-049(e)	Outfall (Inactive)	1114	1	Provide a map indicating the location of the PRS. In addition, provide a summary of the analysis of the waste water in the pond and indicate the SAL for fluoride in soil, if available.
3-050(a)	Potential Soil Contamination from Active Exhaust Stack Emissions	1114	5	Provide a plan indicating the location of each stack and its identification number. Clarify what the superscript a and b mean on the Radioactive Air Emission Summary table in Section 3.2. The request for NFA should document the location and results of soil samples taken around TA-3.

PRS	Description	OU	NFA Criterion	NMED Comment
3-050(d)	Potential Soil Contamination from Active Exhaust Stack Emissions	1114	5	See PRS 3-050(a) comment. Provide a summary of the sampling results as indicated in Attachment F, Page 2, first paragraph.
3-050(e)	Filter Unit (Inactive)	1114	2	Provide a waste manifest form and detailed information indicating the process used at this location.
3-050(f)	Potential Soil Contamination from Active Exhaust Stack Emissions	1114	5	See PRS 3-050(a) comments.
3-050(g)	Potential Soil Contamination from Active Exhaust Stack Emissions	1114	5	See PRS 3-050(a) comments.
3-052(c)	One-Time Release	1114	4	See PRS 3-045(a) comment regarding the need for confirmatory sample results after the cleanup of the oil spill at 3-045(a). Indicate how much oil the security gate hydraulic system required. Please provide documentation of how much soil was removed, where it was disposed, and who handled the disposal.
3-054(a)	Outfall (Decommissioned)	1114	2	Provide documentation that chromates or other cooling tower water treatment chemicals were not used. The request states "there is no history of chromate use at the TA-3-16 and TA-3-19 cooling towers (LANL 1993, 17-932)." Whereas in the referenced document, Attachment A, Bill Radzinski of ENG-6, indicates "it is highly unlikely that chromates were used during cooling tower operation." If the documentation is not available to show that chromates were not used at the site, samples should be collected to show that there was no release of this COPC. The documented information should also include a plan of the decommissioned outfall and its relation to PRS 3-054(d). The decommissioned outfall pipe should be found and removed.
3-054(d)	Outfall (Active)	1114	2	See PRS 3-054(a) comments.

PRS	Description	OU	NFA Criterion	NMED Comment
3-055(a)	Outfall (Active)	1114	2	Additional information should be provided indicating the use of Room 68. Indicate the type of generator (e.g.- waste or electric generator). Also, indicate if Room 68 was used for storage and, if so, what type of materials were stored in the room. HRMB recommends that the drain either be removed or permanently plugged in Room 68.
3-055(d)	Outfall	1114	1	Provide information clarifying the non-existence of this outfall. Attachment A indicates that the outfall exists and was "plugged with dirt and leaves and appeared to be inactive."
3-056(a)	Drum Storage Area (Active)	1114	3	Additional information regarding the construction and maintenance history of the sump should be provided. Has the sump ever received discharge of hazardous materials? Has the sump ever leaked hazardous materials into the environment?
3-056(m)	Drum Storage Area (Inactive)	1114	2	Indicate the size of the area, and what was stored there and if the area has always been concreted.
3-056(n)	Drum Storage Area (Inactive)	1114	3	Indicate if the interviewed workers at JCI worked at this location from the inception of the used drums for lead waste. Also indicate if the site is still being used why is it indicated as being inactive.
18-001(c)	Sump	1093	5	Additional information regarding the sump construction should be provided. Indicate if the sump discharge to the environment. LANL shall conduct sampling at and below the point of discharge (outfall). If sampling has occurred, please provide documentation (summary) of data, conclusions, etc.
18-007	Buried Armored Vehicle	1093	1	Additional information should be provided regarding the use of geophysics in locating this PRS. Provide a summary of the process indicating the area searched, grid, depth to bedrock, etc. Provide field notes, calibration methods for the geophysics and any pertinent photographs (aerial, etc.) as discussed in the Request for NFA.
27-001	Buried Naval Guns	1093	1	See PRS 18-007 comments.

PRS	Description	OU	NFA Criterion	NMED Comment
27-003	Bazooka Impact Area	1093	5	Provide additional information indicating the skewness of the the analytical sampling locations, if five samples were adequate in addressing this large geographic area and, if any, radioactives were addressed in field screening or analytical chemistry. Provide a summary of all analytical results.
36-002	Sump	1130	5	Nature and extent of the contamination was not determined. Provide the QA/QC for the analytical chemistry for this PRS.

**ATTACHMENT B**  
**September 1996 Request for Permit Modification**

**Solid Waste Management Units Proposed for NFA Pending Approval Upon  
Public Comment**

- 3-024, Tank and/or Associated Equipment
- 3-045(d), Storage Tank (Above Ground)
- 7-003(c), Clerical Error
- 7-003(d), Clerical Error
- 52-002(e), Septic Tank and Seepage Pit (Active)