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September 11, 1997

Mr. Dave McInroy  
Los Alamos National Laboratory  
EM/ER, MS M992  
Los Alamos, NM 87545

RE: Review Of Draft AP 4.5, R1 Submitted On September 5, 1997 to NMED-SWQB

Dear Mr. McInroy:

The New Mexico Environment Department-Surface Water Quality Bureau (NMED-SWQB) has reviewed the draft AP 4.5, R1 submitted on September 5, 1997, and discussed at a September 10, 1997 meeting with you, Mr. Steve Veenis, of ESH-18 and Mr. H.L. "Jody" Plum of DOE/LAAO. Many of the comments were expressed at the meeting and are merely being reiterated, however others were not discussed and are presented here.

The general comments concerning the AP 4.5, R1 document reviewed are:

1. All items of the AP4.5 Parts A and B need to be filled out. If the answer is not known indicate (NK) if not available indicate (NA). Also indicate choices where provided (i.e., on Part A PRS Status, check the status and also indicate type, (e.g., Other indicate which other, CMs, Monitoring or whatever it is).
2. If maps are to be provided, select those which indicate the location of the samples presented in the AP 4.5 assessment.
3. Please provide COPEC's when available.
4. When assessing the site consider the entire site and choose the most vulnerable area of the site for evaluation (i.e., when the site boundary involves a mesa top and slope focus on the slope).



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5. If BMP's are present, conduct the evaluation as if the BMP's were not present. Use the Comment Section to indicate the effectiveness of the BMP's at the site.

Additional comments:

1. Add to the Part A Form under Sample Information the following: "Is there evidence (e.g. from RFI WP, Rpt. or sampling activity, etc.) that debris has been disposed of in the watercourse? If so, identify type of debris. As discussed at the meeting, this is to identify those sites that may need separate attention under WQCC 1203.

2. On the introduction sheets, the following changes are recommended:

Under 2.0 SCOPE second sentence add "conditions may be" after the word "contaminants" and before the word "present".

Under 3.0 DEFINITIONS, the following definition of AOC should be changed to "any suspected release of hazardous waste or hazardous waste constituent which is not directly associated with a SWMU" (RCRA Facility Assessment Guidance, EPA 1986).

Under 3.0 DEFINITIONS, it is recommended to include the WQCC definitions for "disposal of refuse", and "water pollution".

Under 4.0 RESPONSIBILITIES, identify a contact person who will respond to NMED-SWQB and NMED DOE/OB concerns about the evaluation process and who will also be responsible for providing them with completed evaluation reports. Also expand this section to include the responsibilities/roles of the facility managers with regard to sites indicated by the survey as having surface water concerns.

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Under 5.0 PROCEDURE add "watering after livestock and "habitat" after wildlife, and "WQCC 2201" after "WQCC 1203". In addition, consider changing the language of the last sentence to reflect the previous language in the AP 4.5 version presented in the September 24, 1996 letter to Mr. Piatt from Mr. Baca.

Under 5.1 OVERVIEW OF EVALUATION PROCESS , the last sentence indicates corrective action may be required. It is recommended that the language in the AP4.5 version in the September 24, 1996 letter to Mr. Piatt from Mr. Baca be used which states that corrective action will be done.

Under 5.1.1 PROCESS FOR EVALUATION refer to the DOU NFA Criteria for the correct working of criteria # 3 , also a better example should be provided.

Under 5.2.1 include language which indicates NMED-DOE/OB will receive copies of the " written summaries" compiled by ESH-18 on those sites which the survey indicate as having surface water quality concerns.

Under 5.2.2 PRIORITIZATION it is recommended that adding language which reflects the role of the Surface Water Site Assessment Team in prioritization. Indicate that NMED-DOE/OB is included as part of this team. Also expand upon the responsibility/role of other landlords in addressing surface water concerns.

Specific comments regarding the 30+ evaluations presented by Mr. Steve Veenis at the last monthly meeting held August 20, 1997.

PRS 0-016	No map, no description of run-off
PRS 0-030(l)	Location of samples was not provided (map)
PRS 1-001(c,d)	Site setting incorrect, slope incorrect, runoff termination incorrect, no confirmatory sampling data, no stormwater data, is there any pending data? what assumptions are being made here to result in such a low score?

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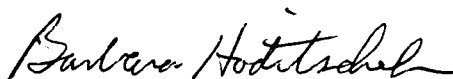
PRS 1-001(f)	sample id does not match map, slope not accurate, need stormwater data, high score-status of BMP's
PRS 16-029(g)	relatively good map/data information example
PRS 21-011(k)	No COPESS listed, No FMU, No Part A data presented, No Dates for Pl, Fw, or Rpt, slope is too low, high score, status of BMPs?
PRS 21-016(a)	Map of PRS includes drainages into DP, slope too low
PRS 22-010(a)	No watershed given, need water sample details
PRS 22-010(b)	Source of water samples?
PRS 22-014(a)	No watershed data
PRS 22-014(b)	High score, status of BMPs?
PRS 22-015 (a)	No map, where are water samples from, water samples exceed SALs
PRS 22-015(b)	No Part A, no watershed info., does this drain to a marsh in a canyon?
PRS 22-015(c)	Define "other" in Part A, data on hill slope to Pajarito, clean-up level given confirm. samples?, within bench of canon, no dates given
PRS 33-002(d,e)	No matrix given
PRS 33-004(i)	No FMU contact, high score, BMP status?
PRS 33-006(a)	No FMU contact, no matrix, high score BMP status?
PRS 33-007(b)	High score, BMP status?

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PRS 33-007(c)	Data and map for 33-010(c) given???
PRS 33-009	No watershed data, setting in watercourse, runoff termination, run-on?? score too low, what are the assumptions being made here?
PRS 35-008	No data, referred to data for PRS 35-014(e), but data supplied on for PRS 35-014(f), no dates for Pl, Fw, Rpt., map is meaningless, high score, BMP status?
PRS 35-014(e)	No dates for Pl, Fw, Rpt., data supplied was for 35-014(f) High score, status of BMPs?
PRS 40-001(b)	No dates for Pl, Fw, Rpt., water data supplied from where??. no watershed info., score is low, why??
PRS 40-006(a)	Map does not show sample points, high score, status of BMPs?, active firing site, who makes decisions here??
PRS 48-002(e)	No SRS, no dates for Pl, FW, Rpt.
PRS 48003	No SRS, no dates for Pl, FW, Rpt., high score, BMP status?
PRS 48-007(a)	No dates for Pl, FW, Rpt., high score, BMP status?
PRS 48-010	No SRS, no dates for Pl, FW, Rpt., high score, BMP status?

We appreciate the opportunity to comment on the AP 4.5 process, and look forward to further dialogue during finalization. If you have any questions concerning this letter, please contact me at 827-0596 or Mr. Ralph Ford-Schmid at 827-1536.

Sincerely,



Barbara Hoditschek  
Environmental Specialist  
Surface Water Quality Bureau

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cc: G. Saums, NMED-SWQB  
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