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MARK E. WEIDLER
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DEPUTY SECRETARY

Permit

October 22, 1997

Elmer C. Torres, Governor
San Ildefonso Pueblo
Route 5, Box 315-A
Santa Fe, New Mexico 87501

RE: Los Alamos National Laboratory (LANL) Class III Permit Modification

Governor Torres:

This letter is in response to the San Ildefonso Pueblo (Pueblo) letter dated October 1, 1997 regarding the removal of three Solid Waste Management Units (SWMUs) from LANLs Resource Conservation and Recovery Act (RCRA) permit. The letter indicated that the Pueblo concurs with the removal of SWMUs 3-045(d) and 52-002(e). It also states that there are concerns regarding the removal of SWMU 3-024 from the permit.

The RCRA Permits Management Program (RPMP) is sending you information (attachment) provided in the Class 3 permit modification for the Pueblo to review. This information was used in the RPMPs decision deeming the SWMU appropriate for no further action. The RPMP would also like to meet with the Pueblo to discuss their concerns about the removal of SWMU 3-024. A meeting should be scheduled prior to November 12, 1997, the last day of the public comment period. Please contact John Kieling at 827-1558 to schedule a meeting. The RPMP appreciates input and looks forward to hearing from the Pueblo.

Sincerely,

Robert S. (Stu) Dinwiddie, Manager
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau

RSD:jek

attachment



15651

2

Governor Torres
October 22, 1997
Page 2

cc: J. Kieling, NMED HRMB
B. Wyatt, DECP, San Ildefonso
File: RED LANL '97
Track: LANL, 10/22/97, na, San Ildefonso, HRMB/jek, RE, File

SWMU 3-024 — Tank and/or Associated Equipment

1.0 Introduction

SWMU 3-024 is located in former Operable Unit (OU) 1114 (Figure 1-1) within Technical Area (TA)-3 (Figure 1-2 and Index Map) at Los Alamos National Laboratory, Los Alamos, New Mexico.

1.1 Description

SWMU 3-024 (Map 3-024) is a pump pit (concrete vault) built of reinforced concrete with a steel and concrete cover. The pump pit is 19.6 ft long x 13.6 ft wide x 11.8 ft deep, with a capacity of 3,200 ft³. The system is a closed-circuit pump unit used to pump noncontact cooling water for electric furnaces located at building TA-3-141, the Rolling Mill Facility located within the Sigma Complex. The noncontact cooling water flows through a roof-mounted water chiller, through operating equipment in the building, and back through the pump. The unit has been active since 1962.

1.2 No Further Action Basis

SWMU 3-024 is recommended for NFA because it has never been used for the management (i.e., generation, treatment, storage, or disposal) of RCRA solid or hazardous wastes or constituents, or other CERCLA hazardous substances. Furthermore, no known releases to the environment have occurred from the system (Griggs 1993, 17-844) (Attachment A). Nor are any likely to occur in the future, because more than 3,200 ft³ of water would have to accumulate in order for the tank to overflow (Griggs 1993, 17-844) (Attachment A). No contaminants are associated with the pump pit because it handles only noncontact cooling water for electric furnaces.

After reviewing the RFI Work Plan for OU 1114, the US Environmental Protection Agency concurred that SWMU 3-024 be proposed for removal from the HSWA Module of the Laboratory's Hazardous Waste Facility Permit (Appendix A Attachment 1, page 3, note preceding Specific Comment 12) via a Class 3 permit modification request.

2.0 History

2.1 Historical Operations

Pump pit of a closed system used to pump noncontact cooling water for electric furnaces.

2.2 Previous Audits, Inspections, and Findings

Attachment A: LANL Memorandum CLS-ER/EG-93:069, Griggs 1993.

Appendix A Attachment 1: US EPA, Letter from D. W. Neleigh to T. J. Taylor listing deficiencies for OU 1114, Work Plan Addendum 1.

3.0 Evaluation of Relevant Evidence

3.1 Unit Characteristics and Operating Practices

Section not applicable.

3.2 Results of Sampling/Surveys

Section not applicable.

3.3 Gaps in Information

Section not applicable.

3.4 Risk Evaluation

Based on evidence outlined in Sections 1.0 and 2.0, no unacceptable risk is presented by this site.

4.0 Rationale for No Further Action Decision

Based on evidence outlined in Sections 1.0 and 2.0, SWMU 3-024 is recommended for NFA under Criterion 2.

5.0 References

Environmental Protection Agency Region 6, November 1995. "Notice of Deficiency, Addendum 1 to Work Plan for Operable Unit (OU) 1114, Los Alamos National Laboratory," letter to T. J. Taylor, Program Manager, Department of Energy, Los Alamos National Laboratory, from D. W. Neleigh, Chief, New Mexico, Federal Facilities Section, Dallas, Texas.

Griggs, E., June 10, 1993. "Status of SWMU 3-024 at TA-3-141," Los Alamos National Laboratory Memorandum CLS-ER/EG-93:069 to File from E. Griggs (CLS-DO), Los Alamos, New Mexico. (Griggs 1993, 17-844)

Los Alamos National Laboratory, July 1995. "RFI Work Plan for Operable Unit 1114, Addendum 1," Los Alamos National Laboratory Report LA-UR-95-731, Los Alamos, New Mexico, pp 6-51. (LANL 1995, 1291)

6.0 Annexes

6.1 RFI Analytical Results

Section not applicable.

6.2 Site Map

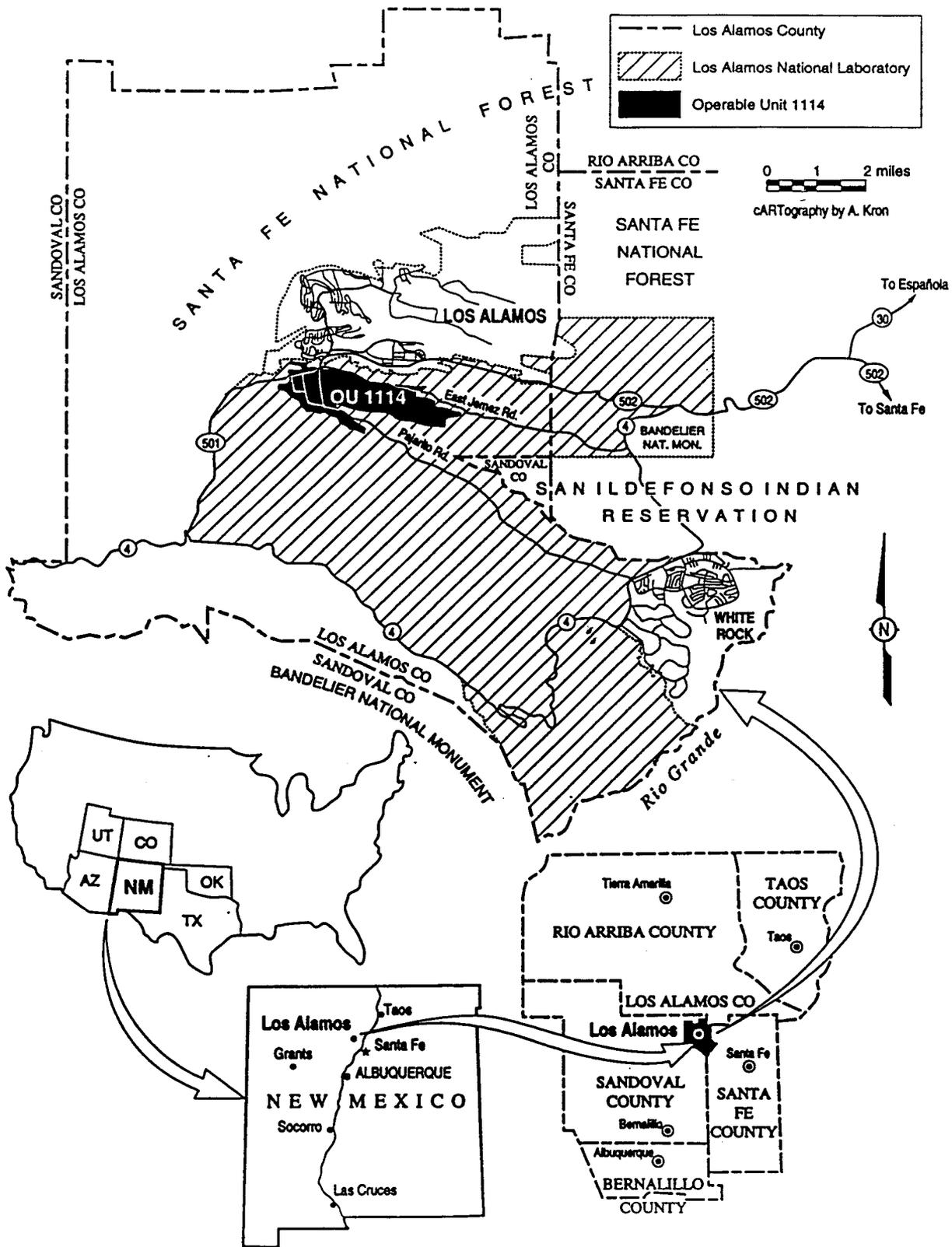


Fig. 1-1. Location of Operable Unit 1114.

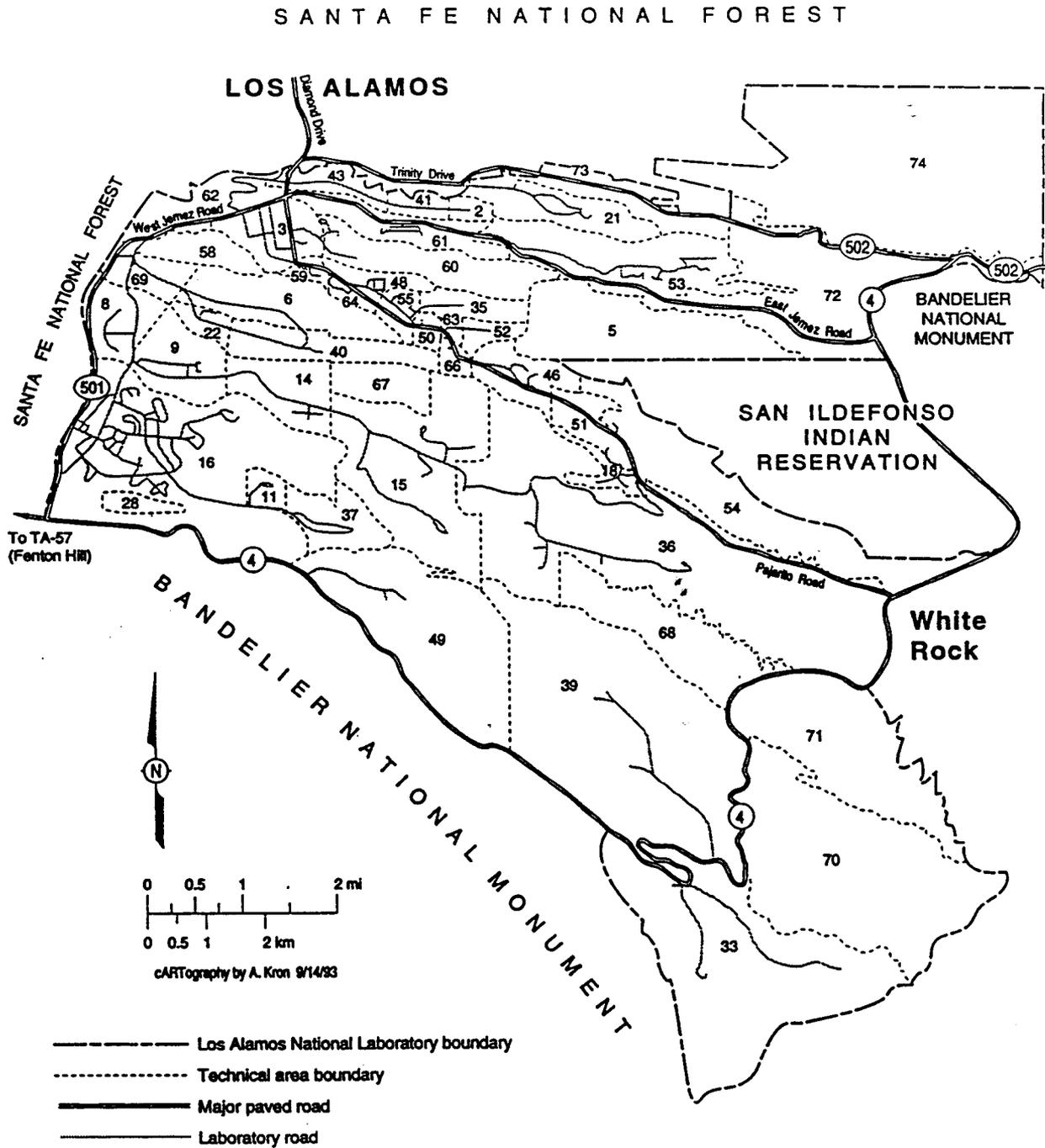
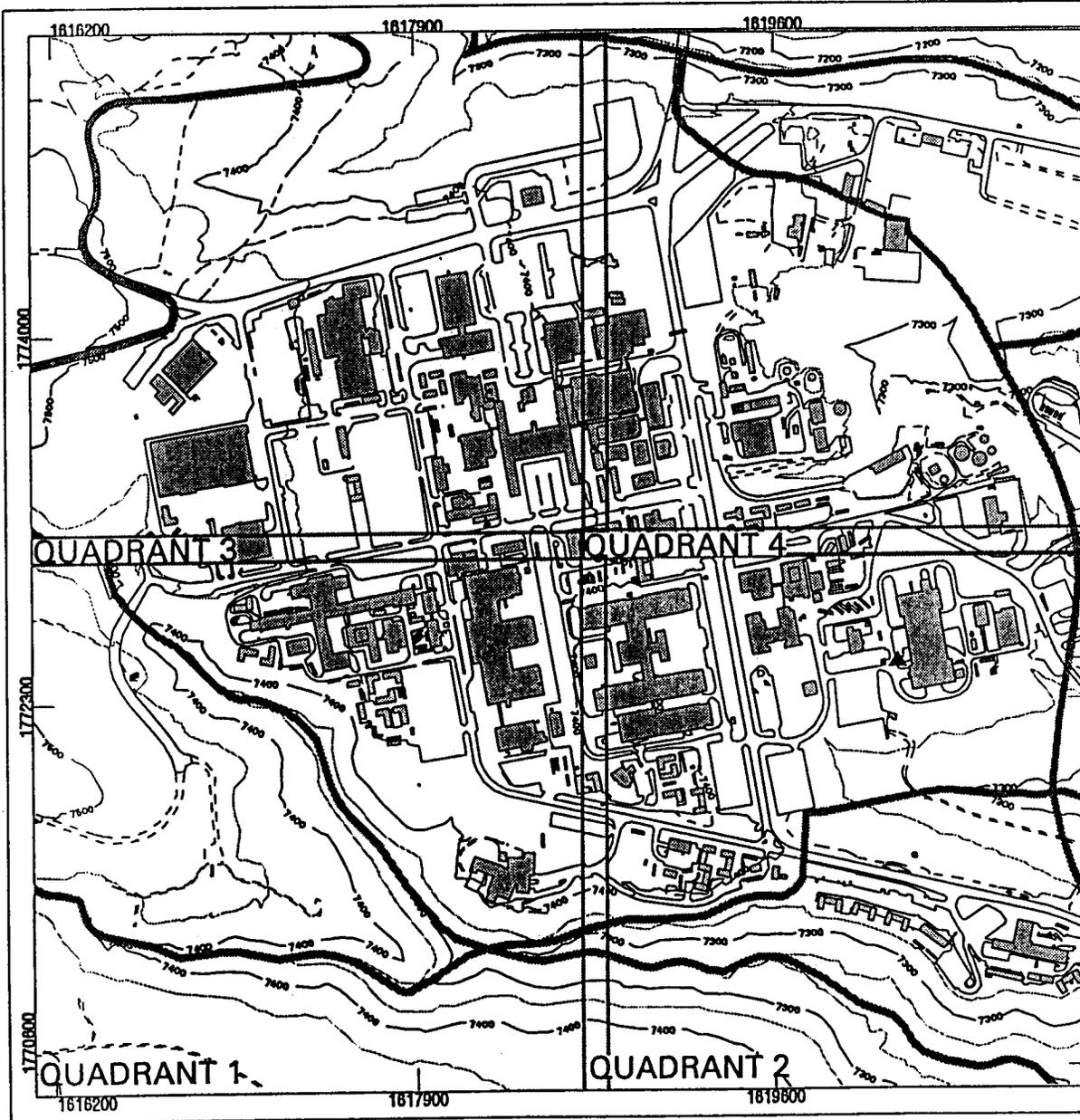


Figure 1-2. Technical areas at Los Alamos National Laboratory.



Potential Release Sites
Considered for NFA
Index Map
TA-03

- Boundary, LANL
- Boundary, TA
- Contours, 50 foot
- Contours, 100 foot
- Roads, Dirt
- Roads, Paved
- Road/Trail
- Structure
- Underground Structure
- NFA PRS



University of California
Los Alamos National Laboratory
Earth and Environmental Sciences

FIMAD

Map Coordinates in New Mexico State Plane Feet
Grid interval, in feet: 1700
Feet per inch on map = 820

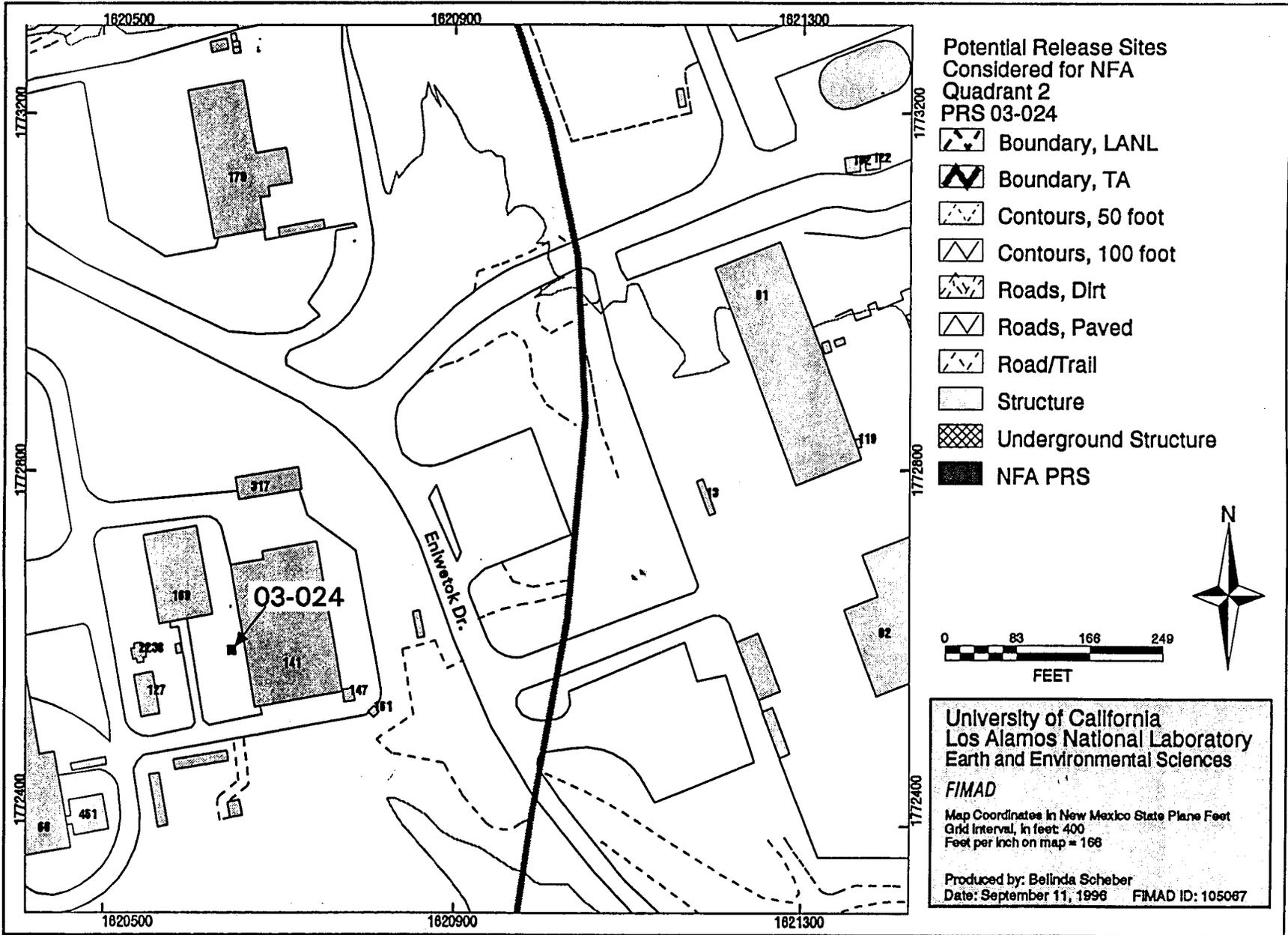
Produced by: Belinda Scheber
Date: September 10, 1996 FIMAD ID: 105052

Potential release sites considered for NFA, TA-03
INDEX MAP

Request For No Further Action
Permit Modification

TA-03 Quadrant 2

September 1996



Potential release sites considered for NFA, TA-03, PRS 03-024

6.3 Other Survey/Investigation Data

Section not applicable.

Los Alamos

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

memorandum

TO: File

DATE: June 10, 1993

FROM: Ed Griggs, CLS-DO *EG*

MAIL STOP/TELEPHONE: E525/7-5544

SYMBOL: CLS-ER/EG-93:069

SUBJECT: STATUS OF SWMU 3-024 AT TA-3-141

The 1988 SWMU Report identified a pump pit associated with the rolling mill building, TA-3-141, process water system.

Ed Griggs visited the site with Joe Mitchell, MST-DO Building Manager, on 6/8/93. The pump pit houses the pumping unit for the building process water system which is a closed-circuit pump unit for the TA-3-141 building. The process water flows from the pump pit through a roof-mounted water chiller, through operating equipment within the building, and back through the pump. The pump pit is built of reinforced concrete, about 13 ft 8 in. square x 11 ft 10 in. average depth, with steel and concrete cover. The unit has been in operation since 1962 and remains operative today. There have been no known leaks from the system.

Cy: Griggs ER File