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PETER MAGGIORE  
SECRETARY

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

December 23, 1998

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

Dr. John C. Browne, Director  
Los Alamos National Laboratory  
P.O. Box 1663, Mail Stop A100  
Los Alamos, New Mexico 87545

**RE: Approval: Class III permit modification to remove ninety-nine (99) Solid Waste Management Units from the Department of Energy / Los Alamos National Laboratory RCRA permit NM 0890010515**

Dear Mr. Taylor and Dr. Brown:

This letter is to inform you that the New Mexico Environment Department (NMED) has approved the Class III permit modification to the US Department of Energy/Los Alamos National Laboratory (DOE/LANL) Resource Conservation and Recovery Act (RCRA) Permit No. NM0890100515 proposed in the Requests for Permit Modification: Units Proposed for No Further Action dated March and September 1995 and September 1996. The modification is effective as of this date.

The modification removes ninety-nine (99) Solid Waste Management Units from Tables A, B and C of Permit Module VIII, Special Conditions Pursuant to the 1984 Hazardous and Solid Waste Amendments (HSWA) to RCRA for Los Alamos National Laboratory. Enclosed are the revised Tables A, B and C replacement pages for the tables currently in Module VIII. Please remove and replace the 12-8-98 modified pages in your copy of the Permit. A list of the ER sites removed are listed in Tables A.1, B.1 and C.1.



15765

RED LANL 6/P/98

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Dr. Browne and Mr. Taylor  
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Three written comments were received by NMED regarding its proposal to approve this permit modification. The comments and responses are enclosed.

Please contact John Kieling of HRMB, at 827-1558 extension 1012, if you have any questions.

Sincerely,



Ed Kelley, Ph. D., Director  
Water and Waste Management Division

enclosures

cc: J. Canepa, LANL EM/ER, MS M992  
J. Davis, NMED SWQB  
R. Dinwiddie, NMED HRMB  
B. Garcia, NMED HRMB  
M. Johansen, DOE LAAO, MS A316  
J. Kieling, NMED HRMB  
H. LeDoux, DOE LAAO, MS A316  
D. McInroy, LANL EM/ER, MS M992  
D. Neleigh, EPA, 6PD-N  
J. Parker, NMED DOE OB  
S. Yanicak, NMED DOE OB, MS J993  
File: HSWA LANL G/P '98  
Track: LANL, 12/23/98, na, DOE/LANL, NMED/WWMD/Kelley, RE, File

Table A

Technical Area 0					
<u>SWMU Number</u>	1-006(c)	3-014(f)	5-004	8-005	
0-001	1-006(d)	3-014(g)	5-005(a)	8-006(a)	
0-003	1-006(h)	3-014(h)	5-005(b)	8-009(a)	
0-011(a)	1-006(n)	3-014(i)	5-006(b)	8-009(d)	
0-011(c)	1-006(o)	3-014(j)	5-006(c)	8-009(e)	
0-011(d)	1-007(a)	3-014(k)	5-006(e)	C-8-010 (12)	
0-011(e)	1-007(b)	3-014(l)	5-006(h) (11)		
0-012	1-007(c)	3-014(m)			
0-016	1-007(d)	3-014(n)	<u>Technical Area 6</u>	<u>Technical Area 9</u>	
0-017	1-007(e)	3-014(o)	6-001(a)	9-001(a)	
0-018(a)	1-007(j)	3-014(p)	6-001(b)	9-001(b)	
0-019	1-007(l) (36)	3-014(q)	6-002	9-001(c)	
0-028(a)		3-014(r)	6-003(a)	9-001(d)	
0-028(b)	<u>Technical Area 2</u>	3-014(s)	6-003(c)	9-002	
0-030(a)	2-005	3-014(t)	6-003(d)	9-003(a)	
0-030(b)	2-006(a)	3-014(u)	6-003(e)	9-003(b)	
0-030(g)	2-006(b)	3-015	6-003(f)	9-003(d)	
0-030(l)	2-007	3-026(d)	6-003(g)	9-003(e)	
0-030(m)	2-008(a)	3-028	6-003(h)	9-003(g)	
0-033	2-008(b)	3-033	6-005	9-003(h)	
0-039 (20)	2-009(a)	3-036(a)	6-006	9-003(i)	
	2-009(b)	3-036(c)	6-007(a)	9-004(a)	
	2-009(c) (9)	3-036(d)	6-007(b)	9-004(b)	
<u>Technical Area 1</u>		3-037	6-007(c)	9-004(c)	
1-001(a)	<u>Technical Area 3</u>	3-038(a)	6-007(d)	9-004(d)	
1-001(b)	3-001(k)	3-038(b)	6-007(e)	9-004(e)	
1-001(c)	3-002(c)	3-043(e)	6-007(f)	9-004(f)	
1-001(d)	3-003(a)	3-044(a)	6-007(g) (19)	9-004(g)	
1-001(e)	3-003(b)	3-056(a)		9-004(h)	
1-001(f)	3-003(c)	3-056(c) (47)	<u>Technical Area 7</u>	9-004(i)	
1-001(g)	3-009(a)		7-001(a)	9-004(j)	
1-001(m)	3-009(c)	<u>Technical Area 4</u>	7-001(b)	9-004(k)	
1-001(o)	3-009(d)	4-001	7-001(c)	9-004(l)	
1-001(s)	3-009(g)	4-002	7-001(d) (4)	9-004(m)	
1-001(t)	3-010(a)	4-003(a)		9-004(n)	
1-001(u)	3-012(b)	4-003(b) (4)	<u>Technical Area 8</u>	9-004(o)	
1-002	3-013(a)		8-002	9-005(a)	
1-003(a)	3-014(a)	<u>Technical Area 5</u>	8-003(a)	9-005(d)	
1-003(d)	3-014(b)	5-001(a)	8-004(a)	9-005(g)	
1-003(e)	3-014(c)	5-001(b)	8-004(b)	9-006	
1-006(a)	3-014(d)	5-002	8-004(c)	9-008(b)	
1-006(b)	3-014(e)	5-003	8-004(d)	9-009	

Table A

9-013	11-005(b)	15-004(b)	Technical Area 16	16-010(h)
C-9-001 (35)	11-005(c)	15-004(c)	16-001(a)	16-010(i)
	11-006(a)	15-004(f)	16-001(b)	16-010(j)
Technical Area 10	11-006(b)	15-004(g)	16-001(c)	16-010(k)
10-001(a)	11-006(c)	15-004(i)	16-001(d)	16-010(l)
10-001(b)	11-006(d)	15-006(a)	16-001(e)	16-010(m)
10-001(c)	11-009	15-006(b)	16-003(a)	16-010(n)
10-001(d)	11-011(a)	15-006(c)	16-003(b)	16-013
10-002(a)	11-011(b)	15-006(d)	16-003(c)	16-016(a)
10-002(b)	11-011(c)	15-007(a)	16-003(d)	16-016(b)
10-003(a)	11-011(d) (21)	15-007(b)	16-003(e)	16-016(c)
10-003(b)		15-007(c)	16-003(f)	16-018
10-003(c)		15-007(d)	16-003(g)	16-019
10-003(d)	Technical Area 12	15-008(a)	16-003(h)	16-020
10-003(e)	12-001(a)	15-008(b)	16-003(i)	16-021(a)
10-003(f)	12-001(b)	15-008(c)	16-003(j)	16-021(c)
10-003(g)	12-002 (3)	15-008(d)	16-003(k)	16-026(b)
10-003(h)		15-009(a)	16-003(l)	16-026(c)
10-003(i)	Technical Area 13	15-009(b)	16-003(m)	16-026(d)
10-003(j)	13-001	15-009(c)	16-003(n)	16-026(e)
10-003(k)	13-002	15-009(e)	16-003(o)	16-026(h2)
10-003(l)	13-003(a)	15-009(f)	16-004(a)	16-026(j2)
10-003(m)	13-004 (4)	15-009(g)	16-004(b)	16-026(v)
10-003(n)		15-009(h)	16-004(c)	16-029(a)
10-003(o)	Technical Area 14	15-009(i)	16-004(d)	16-029(b)
10-004(a)	14-002(a)	15-009(j)	16-004(e)	16-029(c)
10-004(b)	14-002(b)	15-009(k)	16-004(f)	16-029(d)
10-005	14-002(c)	15-010(a)	16-005(g)	16-029(e)
10-006	14-002(d)	15-010(b)	16-005(n)	16-029(f)
10-007 (26)	14-002(e)	15-010(c)	16-006(a)	16-029(g)
	14-002(f)	15-011(a)	16-006(c)	16-030(h)
Technical Area 11	14-003	15-011(b)	16-006(d)	16-035
11-001(a)	14-005	15-011(c)	16-006(e)	16-036 (74)
11-001(b)	14-006	15-012(a)	16-007(a)	
11-001(c)	14-007	15-012(b)	16-008(a)	Technical Area 18
11-002	14-009	15-014(a)	16-009(a)	18-001(a)
11-004(a)	14-010 (12)	15-014(b)	16-010(a)	18-001(b)
11-004(b)		15-014(i)	16-010(b)	18-001(c)
11-004(c)	Technical Area 15	15-014(j)	16-010(c)	18-002(a)
11-004(d)	15-002	15-014(k)	16-010(d)	18-002(b)
11-004(e)	15-003	15-014(l) (44)	16-010(e)	18-003(a)
11-005(a)	15-004(a)		16-010(f)	18-003(b)

Table A

18-003(c)	21-010(b)	21-022(i)	Technical Area 26	33-005(a)
18-003(d)	21-010(c)	21-022(j)	26-001	33-005(b)
18-003(e)	21-010(d)	21-023(a)	26-002(a)	33-005(c)
18-003(f)	21-010(e)	21-023(b)	26-002(b)	33-006(a)
18-003(g)	21-010(f)	21-023(c)	26-003 (4)	33-006(b)
18-003(h)	21-010(g)	21-023(d)		33-007(a)
18-004(a)	21-010(h)	21-024(a)	Technical Area 27	33-007(b)
18-004(b)	21-011(a)	21-024(b)	27-001	33-007(c)
18-005(a)	21-011(b)	21-024(c)	27-002	33-008(a)
18-007	21-011(c)	21-024(d)	27-003 (3)	33-008(b)
18-012(a)	21-011(d)	21-024(e)		33-009
18-012(b) (19)	21-011(e)	21-024(f)	Technical Area 31	33-010(a)
	21-011(f)	21-024(g)	31-001 (1)	33-010(b)
Technical Area 19	21-011(g)	21-024(h)		33-010(c)
19-001	21-011(i)	21-024(i)	Technical Area 32	33-010(d)
19-002	21-011(j)	21-024(j)	32-001	33-010(f)
19-003 (3)	21-011(k)	21-024(k)	32-002(a)	33-010(g)
	21-012(b)	21-024(l)	32-002(b) (3)	33-010(h)
Technical Area 20	21-013(a)	21-024(n)		33-011(a)
20-001(a)	21-013(b)	21-024(o)	Technical Area 33	33-011(c)
20-001(b)	21-013(c)	21-026(a)	33-001(a)	33-011(d)
20-001(c)	21-013(d)	21-026(b)	33-001(b)	33-011(e)
20-002(a)	21-013(e)	21-027(a)	33-001(c)	33-012(a)
20-002(b)	21-014	21-027(c)	33-001(d)	33-013
20-002(c)	21-015	21-027(d)	33-001(e)	33-014
20-002(d)	21-016(a)	21-029 (80)	33-002(a)	33-015
20-003(a)	21-016(b)		33-002(b)	33-016
20-005 (9)	21-016(c)	Technical Area 22	33-002(c)	33-017 (50)
	21-017(a)	22-010(a)	33-002(d)	
Technical Area 21	21-017(b)	22-010(b)	33-002(e)	
21-002(a)	21-017(c)	22-011	33-003(a)	Technical Area 35
21-003	21-018(a)	22-012	33-003(b)	35-002
21-004(b)	21-018(b)	22-014(a)	33-004(a)	35-003(a)
21-004(c)	21-021	22-014(b)	33-004(b)	35-003(b)
21-005	21-022(a)	22-015(a)	33-004(c)	35-003(c)
21-006(a)	21-022(b)	22-015(b)	33-004(d)	35-003(d)
21-006(b)	21-022(c)	22-015(c)	33-004(g)	35-003(e)
21-006(c)	21-022(d)	22-015(d)	33-004(h)	35-003(f)
21-006(d)	21-022(e)	22-015(e)	33-004(i)	35-003(g)
21-006(e)	21-022(f)	22-016 (12)	33-004(j)	35-003(h)
21-007	21-022(g)		33-004(k)	35-003(j)
21-010(a)	21-022(h)		33-004(m)	35-003(k)

Table A

35-003(l)	Technical Area 36	Technical Area 42	46-004(r)	Technical Area 49
35-003(m)	36-001	42-001(a)	46-004(s)	49-001(a)
35-003(n)	36-002	42-001(b)	46-004(t)	49-001(b)
35-003(o)	36-003(a)	42-001(c)	46-004(u)	49-001(c)
35-003(p)	36-003(b)	42-002(b)	46-004(v)	49-001(d)
35-003(q)	36-004(d)	42-003 (5)	46-004(w)	49-001(e)
35-004(a)	36-005		46-004(x)	49-001(f)
35-004(b)	36-006	Technical Area 43	46-004(y)	49-001(g)
35-004(e)	C-36-003 (8)	43-001(a)	46-004(z)	49-003
35-004(g)		43-002 (2)	46-005	49-004
35-004(h)	Technical Area 39		46-006(a)	49-005(a)
35-006	39-001(a)	Technical Area 45	46-006(b)	49-006 (11)
35-008	39-001(b)	45-001	46-006(c)	
35-009(a)	39-002(a)	45-002	46-006(d)	Technical Area 50
35-009(b)	39-004(a)	45-003	46-006(f)	50-001(a)
35-009(c)	39-004(b)	45-003 (4)	46-006(g)	50-002(a)
35-009(d)	39-004(c)		46-007	50-002(b)
35-009(e)	39-004(d)	Technical Area 46	46-008(a)	50-002(c)
35-010(a)	39-004(e)	46-002	46-008(b)	50-004(a)
35-010(b)	39-005	46-003(a)	46-008(d)	50-004(b)
35-010(c)	39-006(a)	46-003(b)	46-008(e)	50-004(c)
35-010(d)	39-007(a)	46-003(c)	46-008(f)	50-006(a)
35-011(a)	39-008 (12)	46-003(d)	46-008(g)	50-006(c)
35-013(a)		46-003(e)	46-009(a)	50-006(d)
35-013(b)	Technical Area 40	46-003(f)	46-009(b)	50-009
35-013(c)	40-001(b)	46-003(g)	46-010(d) (50)	50-011(a) (12)
35-013(d)	40-001(c)	46-003(h)		
35-014(a)	40-003(a)	46-004(a)	Technical Area 48	Technical Area 52
35-014(b)	40-004	46-004(b)	48-002(a)	52-001(d)
35-014(e)	40-005	46-004(c)	48-002(b)	52-002(a) (2)
35-014(g)	40-006(a)	46-004(d)	48-003	
35-015(a)	40-006(b)	46-004(e)	48-004(a)	Technical Area 53
35-015(b)	40-006(c)	46-004(f)	48-004(b)	53-001(a)
35-016(a)	40-009	46-004(g)	48-004(c)	53-001(b)
35-016(c)	40-010 (10)	46-004(h)	48-005	53-002(a)
35-016(d)		46-004(a2)	48-007(a)	53-002(b)
35-016(i)	Technical Area 41	46-004(b2)	48-007(b)	53-005
35-016(k)	41-001	46-004(c2)	48-007(c)	53-006(b)
35-016(m)	41-002(a)	46-004(d2)	48-007(d)	53-006(c)
35-016(o)	41-002(b)	46-004(m)	48-007(f)	53-006(d)
35-016(p)	41-002(c) (4)	46-004(p)	48-010 (13)	53-006(e)
35-016(q) (53)		46-004(q)		53-006(f)

**Table A**

53-007(a) (11)	54-014(c)	Technical Area 59	61-006	73-001(b)
	54-014(d)	59-001 (1)	61-007 (5)	73-001(c)
Technical Area 54	54-015(h)			73-001(d)
54-001(a)	54-015(k)	Technical Area 60	Technical Area 63	73-002
54-004 (excluding Shaft No. 9)	54-017	60-002	63-001(a)	73-004(a)
54-005	54-018	60-005(a)	63-001(b) (2)	73-004(b)
54-006	54-019	60-006(a)		73-004(c)
54-007(a)	54-020 (18)	60-007(a)	Technical Area 69	73-004(d)
54-007(b)		60-007(b) (5)	69-001 (1)	73-005
54-007(c)	Technical Area 55			73-006 (11)
54-012(b)	55-008	Technical Area 61		
54-013(b)	55-009 (2)	61-002		Total SWMUs in Table A = 801
54-014(b)		61-004(a)	Technical Area 73	
		56.00	73-001(a)	

**Table A.1**  
 No Further Action

SWMUs removed from Table A through a Class III Permit Modification and date of removal

0-005 12-23-98	3-035(b) 12-23-98	16-005(i) 12-23-98	16-012(o) 12-23-98	39-003 12-23-98
1-001(h) 12-23-98	3-039(a) 12-23-98	16-005(o) 12-23-98	16-012(p) 12-23-98	39-006(b) 12-23-98
1-001(i) 12-23-98	7-003(c) 12-23-98	16-006(b) 12-23-98	16-012(q) 12-23-98	40-001(a) 12-23-98
1-001(j) 12-23-98	7-003(d) 12-23-98	16-006(f) 12-23-98	16-012(r) 12-23-98	46-008(c) 12-23-98
1-001(k) 12-23-98	8-003(b) 12-23-98	16-010(g) 12-23-98	16-012(s) 12-23-98	52-001(a) 12-23-98
1-001(l) 12-23-98	8-003(c) 12-23-98	16-012(a) 12-23-98	16-012(t) 12-23-98	52-001(b) 12-23-98
1-001(n) 12-23-98	8-006(b) 12-23-98	16-012(b) 12-23-98	16-012(u) 12-23-98	52-001(c) 12-23-98
3-001(a) 12-23-98	8-007 12-23-98	16-012(c) 12-23-98	16-012(v) 12-23-98	52-002(b) 12-23-98
3-001(b) 12-23-98	9-003(c) 12-23-98	16-012(d) 12-23-98	16-012(w) 12-23-98	52-002(c) 12-23-98
3-001(c) 12-23-98	9-003(f) 12-23-98	16-012(e) 12-23-98	16-012(x) 12-23-98	52-002(d) 12-23-98
3-002(b) 12-23-98	9-005(b) 12-23-98	16-012(f) 12-23-98	16-012(y) 12-23-98	52-002(e) 12-8-97
3-009(b) 12-23-98	9-005(c) 12-23-98	16-012(g) 12-23-98	16-012(z) 12-23-98	52-002(f) 12-23-98
3-009(e) 12-23-98	9-005(e) 12-23-98	16-012(h) 12-23-98	21-012(a) 12-23-98	53-007(b) 12-23-98
3-009(f) 12-23-98	9-005(f) 12-23-98	16-012(i) 12-23-98	21-024(m) 12-23-98	54-001(c) 12-23-98
3-009(h) 12-23-98	9-005(h) 12-23-98	16-012(j) 12-23-98	21-027(b) 12-23-98	54-013(a) 12-23-98
3-012(a) 12-23-98	9-007 12-23-98	16-012(k) 12-23-98	33-004(e) 12-23-98	
3-018 12-23-98	11-007 12-23-98	16-012(l) 12-23-98	33-004(f) 12-23-98	
3-020(a) 12-23-98	14-004(b) 12-23-98	16-012(m) 12-23-98	35-003(i) 12-23-98	
3-035(a) 12-23-98	15-014(m) 12-23-98	16-012(n) 12-23-98	36-003(c) 12-23-98	

SWMUs removed from Table A = 91

**Table B - Priority SWMUs\***

<u>SWMU Number</u>	11-004(e)	16-007	21-011(h)	36-003(a)
1-001(a)	11-005(a)	16-008(b)	21-011(i)	36-003(b)
1-001(b)	11-005(b)	16-016	21-014	39-001(a)
1-001(c)	11-006(a)	16-018	21-015	39-001(b)
1-001(d)	13-004	16-019	21-016(a)	41-001
1-001(e)	15-002	16-020	21-017(a)	46-002
1-001(f)	15-006(a)	16-021(a)	21-017(b)	46-006(a)
1-001(g)	15-006(b)	18-001(a)	21-017(c)	46-006(b)
1-001(m)	15-006(c)	18-003(a)	21-018(a)	46-006(c)
1-002	15-006(d)	18-003(b)	21-018(b)	46-006(d)
1-003(a)	15-007(a)	18-003(c)	22-015(c)	46-007
2-005	15-007(b)	18-003(d)	33-002(a)	49-001(a)
2-008(a)	15-007(c)	18-003(e)	33-002(b)	50-006(a)
3-010(a)	15-007(d)	18-003(f)	33-002(c)	50-006(c)
3-012(b)	15-008(a)	18-003(g)	33-017	50-006(d)
3-013(a)	15-008(b)	18-003(h)	35-003(a)	50-009
3-015	15-008(c)	21-006(a)	35-003(b)	54-004 (except Shaft No. 9)
3-029(a)	15-008(d)	21-006(b)	35-003(c)	
5-005(a)	15-009(a)	21-006(c)	35-003(d)	54-005
6-007(a)	15-009(b)	21-006(d)	35-003(e)	54-015(h)
8-003(a)	15-012(a)	21-006(e)	35-003(f)	60-005(a)
9-008(a)	15-012(b)	21-010(a)	35-003(g)	73-001(a)
9-008(b)	15-012(c)	21-010(b)	35-003(h)	
9-009	15-012(d)	21-010(c)	35-003(j)	Total SWMUs in Table B = 164
9-013	15-012(e)	21-010(d)	35-003(k)	
10-003(a)	15-012(f)	21-010(e)	35-003(l)	* As RFI work progresses, EPA main identify more SWMUs to be added to the list to be addressed in the installation workplans.
10-003(b)	15-012(g)	21-010(f)	35-003(m)	
10-003(c)	16-001(b)	21-010(g)	35-003(n)	
10-003(d)	16-001(c)	21-010(h)	35-003(o)	
10-003(e)	16-001(d)	21-011(a)	35-003(p)	
10-003(f)	16-001(e)	21-011(b)	35-003(q)	
10-006	16-005(n)	21-011(c)	35-006	
11-004(a)	16-006(a)	21-011(d)	35-010(a)	
11-004(b)	16-006(b)	21-011(e)	35-010(b)	
11-004(c)	16-006(d)	21-011(f)	35-010(c)	
11-004(d)	16-006(e)	21-011(g)	35-010(d)	

**Table B.1**  
 No Further Action  
 SWMUs removed from Table B through a Class III Permit Modification and date of removal

0-005	12-23-98	1-001(k)	12-23-98	3-020(a)	12-23-98	16-005(o)	12-23-98	36-003(c)	12-23-98
1-001(h)	12-23-98	1-001(l)	12-23-98	8-003(b)	12-23-98	16-006(f)	12-23-98		
1-001(i)	12-23-98	1-001(n)	12-23-98	8-003(c)	12-23-98	21-012(a)	12-23-98		
1-001(j)	12-23-98	3-012(a)	12-23-98	8-007	12-23-98	35-003(i)	12-23-98		

SWMUs removed from  
Table B = 17

**Table C**

RFI Work Plan due July 7, 1994: Technical Area 16	16-005(a)	16-025(x)	16-034(d)	16-026(y)	3-034(b)
	16-005(b)	16-025(y)	16-034(e)	16-026(z)	3-043(c)
	16-005(c)	16-025(z)	16-034(f)	16-028(b)	3-045(a)
	16-005(d)	16-026(m)	16-034(l)	16-028(c)	3-045(b)
	16-005(e)	16-026(n)	16-034(m)	16-028(d)	3-045(c)
	16-005(h)	16-026(o)	16-034(n)	16-028(e)	3-045(e)
	16-005(j)	16-026(p)	16-034(o)	16-029(h)	3-045(f)
	16-005(k)	16-026(q)	16-034(p)	16-029(i)	3-045(g)
	16-005(l)	16-026(s)	C-16-025	16-029(j)	3-045(h)
	16-005(m)	16-026(w)	C-16-026	16-030(a)	3-045(i)
	16-006(g)	16-028(a)	* Total	16-030(b)	3-046
	16-015(a)	16-029(a2)	SWMUs = 92	16-030(c)	3-049(a)
	16-015(b)	16-029(b2)	RFI Work Plan due July 7, 1995: Technical Area 16	16-030(e)	3-049(b)
	16-017	16-029(c2)	16-016(d)	16-030(f)	3-049(c)
	16-024(e)	16-029(d2)	16-016(e)	16-031(a)	3-049(d)
	16-025(a)	16-029(e2)	16-016(g)	16-031(b)	3-049(e)
	16-025(b)	16-029(f2)	16-016(h)	16-031(e)	3-050(a)
	16-025(b2)	16-029(g2)	16-025(a2)	16-031(f)	3-050(d)
	16-025(c2)	16-029(h2)	16-025(d2)	16-031(h)	3-050(e)
	16-025(d)	16-029(k)	16-025(e2)	16-034(h)	3-050(f)
	16-025(e)	16-029(l)	16-025(f2)	16-034(i)	3-050(g)
	16-025(f)	16-029(m)	16-025(h2)	16-034(j)	3-052(a)
	16-025(g)	16-029(n)	16-026(a)	16-034(k)	3-052(c)
	16-025(h)	16-029(o)	16-026(a2)	Total SWMUs = 51	3-052(e)
	16-025(i)	16-029(p)	16-026(b2)	RFI Work Plan due May 21, 1995: Operable Unit 1114	3-052(f)
	16-025(j)	16-029(q)	16-026(c2)	3-002(a)	3-054(a)
	16-025(k)	16-029(r)	16-026(d2)	3-002(d)	3-054(b)
	16-025(l)	16-029(s)	16-026(e2)	3-009(c)	3-054(c)
	16-025(m)	16-029(t)	16-026(f)	3-009(i)	3-054(d)
	16-025(n)	16-029(u)	16-026(f2)	3-009(j)	3-054(e)
	16-025(o)	16-029(v)	16-026(g)	3-011	3-055(a)
	16-025(p)	16-029(w)	16-026(g2)	3-019	3-055(c)
	16-025(q)	16-029(x)	16-026(h)	3-021	3-055(d)
16-025(r)	16-029(y)	16-026(i)	3-025(a)	3-056(d)	
16-025(s)	16-029(z)	16-026(j)	3-025(b)	3-056(l)	
16-025(t)	16-031(c)	16-026(k)	3-025(b)	3-056(m)	
16-025(u)	16-031(d)	16-026(k2)	3-026(b)	3-056(n)	
16-025(v)	16-032(a)	16-026(l)	3-026(c)	3-059	
16-025(w)	16-032(c)	16-026(r)	3-029	Total SWMUs = 54	
	16-034(a)	16-026(t)	3-031	* 20 additional SWMUs were added after workplan review	
	16-034(b)	16-026(u)	3-032		
	16-034(c)	16-026(x)	3-034(a)		

**Table C.1**  
**No Further Action**  
**SWMUs removed from Table C through a Class III Permit Modification**

3-024	12-8-97	16-006(i)	12-23-98	16-026(i2)	12-23-98	16-032(e)	12-23-98	SWMUs removed from Table C = 11
3-045(d)	12-8-97	16-025(c)	12-23-98	16-031(g)	12-23-98	16-034(g)	12-23-98	
16-005(f)	12-23-98	16-025(g2)	12-23-98	16-032(d)	12-23-98			

Tritium (radioactive Hydrogen) was found in the water at the Ildefonso Pueblo a couple of years ago. A report from some time ago was never made public because it showed Tritium going mostly to the brain. Uranium has been found in the water at Nambé and Pojoaque and, as most know, Uranium was named after Uranus. It appears to me that the Government is trying to solve the "Indian problem" of 200 years with heavy metals other than lead. With 2 laboratories in Japan, I'm sure lab management always wanted one closer to their "glowing" bomb factory, like in the Valley. There they could convert "We the People" into "We the Glowing Guinea Pigs." At a Brain Tumor meeting in Los Alamos about 5 years ago, an Albuquerque Journal Reporter asked Lab Managers if the CCNS statement was correct? CCNS claimed that LANL (Los Alamos Nuclear Liars) released 3,200,000 CURIES into the Atmosphere between 1982 and 1992. A lab Audio Technician at the meeting was sure it was a misprint. The red faces of the lab managers told the true story. YES, they did release 3,200,000 CURIES into the Atmosphere, which is technically known as: NUCLEAR FLATULENCE!

The Brain Tumor Committee back then consisted of 19 members. Ten were lab employees, and 5 were lab managers making 45K to 110K a year (at that time). The 9 other "civilians" included wives of lab employees, a local Doctor and one Anti-Nuke. The local doctor was quoted as saying: he never expected to see that many Brain Tumors in his whole career. Two weeks later, he did a 180° and said that many Brain Tumors was normal. It's my guess that DOE and LANL (Los Alamos Nuclear Leukenogenic) sat the good doctor down and explained how one goes about having a successful career in Los Alamos. The doctor has since moved to the north woods and hopefully will never be heard from again.

A similar situation has arisen involving DOE and the Civilian Advisory Board (CAB). The first hand-picked CAB meeting a couple of years ago was made up of people who knew NOTHING. Half of the group raised their hands when I asked how many thought they could influence DOE or LANL (Los Alamos Nuclear Looney-Tunes). DOE is again trying to stack the board with people they can control. Two or three years ago, DOE and LANL (Los Alamos Nuclear Lavatory) again went through an exercise in futility by saying NOW they are going to be straight arrows (like a boomerang). I for one am 99<sup>4</sup>/<sub>100</sub>% sure that DOE and LANL (Los Alamos Never Listens) will NEVER come clean, without pressure. I believe an Environmental Militia (with guns) will be required to get the "Nuclear Nerds" to pay attention that "We the Guinea Pigs" are tired of "Glowing Reports" on how clean the lab is.

For those who don't know, Safety was supposed to become #1 Priority on June 17, 1989. Not '79, not '69, not '59, not '49. The last time the "Bomb" was safe was '39, when it was just a theory. I've often wondered what priority Safety was before June 17, 1989, or even if it was?

The safety problem at the CMR Building is nothing new. LANL (Los Alamos Nuclear Latrine) got off on the wrong foot during WWII and has NEVER addressed safety, except with rhetoric. Some well meaning lab people tried to convince me that all is well behind the Los Alamos Inn. It was a joke among those that knew better back in the 70's, that the deeper they dug, the hotter it got. According to old blueprints, there was a Plutonium Processing Plant where the Los Alamos Inn is today. This plant had 2 pipes running over the side and into the Canyon for years. Today it's supposed to be clean! BARP! LANL (Los Alamos Nukes Loved-ones) has spent most of its cleanup money cleaning up on paper. Any actual cleanup is done by outside firms. LANL (Los Alamos Nuclear Lavatory) has NO idea how to clean up. They have always substituted COVER-UP! Rumor says the lab will be covered up with cement around 2016 and closed. If true, it'll be the only good cover-up by DOE and the lab in more than 1/2 century.

An article appeared in the August 4th issue of Time Magazine that would make even hardened critics like myself BARP! It appears to have been written by the Lab's P.R. Dept. (at gunpoint) or Salt Lake City's P.R. Dept. Many of the CLER group that I talked to at meetings in Pojoaque would not agree with the goody-goody image projected by the article. Many were unemployed because of what they consider was a religious issue. I see it as an economic issue. I would suggest that if some religious sect or cult has destroyed your life beyond repair, then you have a moral obligation to see that it doesn't happen to someone else. Being some will be "escaping" soon, don't put off 'till tomorrow what should be done NOW! DOE wants to make sure that CAB is short for CABRONES!

**Availability of Additional Information:** A Statement of Basis has been prepared to provide additional information on site history, evaluation of relevant investigations, and basis for the decision to approve NRE status. The administrative record for this proposed action consists of this fact sheet, NMED's statement of basis, the legal notice, the proposed revised Tables A, B, and C, and a summary of public involvement activities. The administrative record may be reviewed from October 21 through December 4, 1998 at:

New Mexico Environment Department  
Hazardous and Radioactive Materials Bureau  
P.O. Box 26110  
2044-A Galisteo Street  
Santa Fe, New Mexico 87502  
(505) 827-1561  
Attn: Mr. John Kieling

The legal notice, fact sheet, NMED's Statement of Basis, and modified permit may also be reviewed at:

Los Alamos National Laboratory Community Relations Reading Room  
1350 Central Avenue, Suite 101  
Los Alamos, New Mexico 87544

To obtain a copy of the administrative record or any part thereof, please contact Mr. John Kieling at the New Mexico Environment Department at the above address. Any person who wishes to comment on this permit modification or to request a public hearing should submit written comments/requests, along with the commentor's/requester's name and address, to John Kieling at the above address. Requests for hearing should include a statement of the nature of the issues proposed. Only comments/requests received by December 4, 1998 will be raised. NMED will provide a 30-day notice of the public hearing, if scheduled.

**Final Decision:** All written comments and issues raised at a Public Hearing, if held, will become part of the administrative record and will be considered in formulating the final decision. NMED may approve, or modify and approve, the requested permit modification based on the comments received. NMED will notify DOE/LANL and each person who submitted a written comment during the public comment period or testimony at a Public hearing of the final decision, including any approved change to the proposed modification, and a detailed statement of reasons for any such change. The final decision will be made according to applicable State and Federal laws.

Albuquerque, N.M. 87111, Box 210-x  
102, Santa Fe, NM 87501



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
ENVIRONMENT DEPARTMENT  
Hazardous & Radioactive Materials Bureau  
2044 Galisteo Street  
P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-1557  
Fax (505) 827-1544



PETER MAGGIORE  
SECRETARY

CERTIFIED LETTER  
RETURN RECEIPT REQUESTED

November 16, 1998

Mr. Al Shapolia  
Rt. 11 Box 210-x, #102  
Santa Fe, New Mexico 87501

**RE: Proposed Class III Permit Modification**

Dear Mr. Shapolia:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) is in receipt of your letter regarding the proposed Class III Permit Modification of 99 solid waste management units at Los Alamos National Laboratory. Your letter requested information regarding the plutonium processing plant (in the area of Los Alamos Inn) and what technical area (TA) it is located within.

The plutonium processing plant was located adjacent to Ashley Pond within TA-0 along Trinity Drive at Los Alamos town site. The plant was demolished and used for fill within TA-1, south of TA-0, beneath the current location of Los Alamos Inn. Of the 99 solid waste management units proposed for no further action through a Class III Permit Modification none of these units are located at or near the Los Alamos Inn or the location of the plutonium processing plant. Undergoing investigations by Los Alamos National Laboratory near Los Alamos Inn are currently underway but have not been approved for no further action by NMED.

If you have any additional questions or concerns regarding this matter please call Mr. John Kieling of my staff at (505) 827-1558 x1012.

Sincerely

Benito J. Garcia, Chief  
Hazardous and Radioactive Materials Bureau

What area was the Plutonium  
Processing Plant (L.A. In)

TA # ?



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Surface Water Quality Bureau  
1190 St. Francis Dr., P.O. Box 26120  
Santa Fe, New Mexico 87502  
Phone (505) 827-0187  
Fax (505) 827-0160



PETER MAGGIORE  
SECRETARY

Registered Mail-Return Receipt Requested

Z 128 816 002

November 25, 1998

Mr. John Kieling  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
P.O. Box 26110  
2044-A Galisteo St.  
Santa Fe, New Mexico 87502

**RE: Comments On Notice Of Intent To Approve A Modification To RCRA Permit No. NM0890010515 US Department of Energy/Los Alamos National Laboratory**

Dear Mr. Kieling:

The New Mexico Environment Department-Surface Water Quality Bureau (NMED-SWQB) has reviewed the documentation regarding the notice of intent to approve a Class III permit modification to remove ninety-nine (99) Solid Waste Management Units (SWMUs) from the DOE/LANL RCRA permit. We appreciate this opportunity to review and make comments/recommendations.

SWQB, in most cases, concurred with the Hazardous and Radioactive Materials Bureau (HRMB) regarding the SWMUs proposed for removal from the DOE/LANL RCRA permit. However, in some cases SWQB will require more information concerning certain SWMUs before concurrence can be made. Comments/recommendations are submitted as an attachment to this letter. If you have any questions regarding the comments/recommendations made, please feel

**CHARLES R. WILSON, Ph.D**  
Water Resources and Environmental Consultant

27 November 1998

New Mexico Environment Department  
Hazardous & Radioactive Materials Bureau  
2044 Galisteo Street  
Santa Fe, New Mexico 87502

Attn: John Kieling

**Re: PROPOSED CLASS III PERMIT MODIFICATION FOR  
LOS ALAMOS NATIONAL LABORATORY**

Dear Mr. Kieling:

Thank you for your notification of 21 October 1998 regarding the subject permit modifications. I support your decision to remove the 99 SWMUs from the HSWA Module of the Laboratory's permit. Deleting SWMUs for the reasons you stated (they do not exist, they are duplicates of other SWMUs, they were never used for management or RCRA constituents, and so on) is entirely appropriate. I am personally aware of the problems that Laboratory personnel have encountered in tracking down many of the sites in the original SWMU list. I have concluded that the original list was based on insufficient information and contained many sites that should not have been included.

Sincerely,



Charles R. Wilson, P.E.



## ENCLOSURE

### Surface Water Quality Bureau (SWQB) Comments on Notice of Intent To Approve A Modification To The DOE/LANL RCRA Permit No. NM890010515

The SWQB has reviewed the information provided in the Notice of Intent for ninety-nine (99) SWMUs located at LANL and offers the following comments:

SWQB typically requires information regarding assessment of erosion potential (for LANL, the AP4.5) be provided for evaluation of all SWMUs considered for NFA. This information is a fundamental part of SWQB's decision making process regarding surface water concerns at SWMUs. Of the 99 SWMUs proposed for NFA, 20 had AP 4.5 scores. The 79 SWMUs without scores were reviewed to determine if an AP 4.5 would be required. All 99 SWMUs were evaluated with regard to potential surface water concern.

Review of the information provided in the NFA decision document indicate that some of the 79 SWMUs would not require an erosion potential evaluation. The following SWMUs will not require a AP 4.5 for the following reasons:

- 1) the SWMU did not exist or was not found: 3-009(b,c), 21-012(a), 40-001(a), 46-008(c), 52-002 (c,d), and 54-013(a);
- 2) the SWMU is a typographical error: 7-003(c,d);
- 3) the SWMU is a duplicate of another SWMU: 3-009(h)=60-002, 8-006(b)=8-006(a), 16-005(i)=13-003(a), 16-006(i)=16-006(f), 16-032(d)=16-029(f2), and 16-017=16-034(g);
- 4) the SWMU will be investigated as part of another SWMU: 1-001(i,k) as 1-007(h), 1-001(n) as 1-007(d), 16-026(i2) as 16-006(a), and 16-012(k,r and s) as 16-029 (c,f,e);

**NOTE:** SWQB recommends a AP 4.5 evaluation for erosion potential be completed for the following SWMUs when they are investigated:

1-007(h), 1-007(d), 60-002, 8-006(a), 13-003(a), 16-006(f), 16-029(c,f,e), 16-006(a), and 16-029(f2).

The following SWMUs are septic systems, and will not require an AP 4.5 evaluation for erosion potential, **unless the leachfields associated with these SWMUs "daylite" to the environment.** If the SWMU has a leachfield which daylites and is identified as a separate SWMU, the AP 4.5 can be done when that SWMU is investigated, otherwise, the AP 4.5 must be done before SWQB can considered for NFA approval by the SWQB:

Mr. Kieling  
NFA Comments  
November 25, 1998  
Page 2

free to call Ms. Barbara Hoditschek of my staff at 827-0596.

Thank you again for your cooperation and the opportunity to comment.

Sincerely,



James H. Davis, Ph.D., Chief  
Surface Water Quality Bureau

Enclosure

cc:

E. Kelley, Ph.D., Dir., NMED-WWMD  
B. Garcia, Chief, NMED-HRMB  
M. Leavitt, Chief, NMED-GWQB  
J. Parker, Chief, NMED-DOE/OB  
T. Taylor, DOE LAAO, MS A316  
D. Neliegh, EPA, 6PD-N  
File:LANL:NFA:99:SWQB

**SWQB Comments : 99 NFA Sites**

**November 25, 1998**

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1-001(h,l), 8-003(b,c), 9-003(c,f), 9-005(b,c,e,f,h), 9-007, 16-005(o), 16-006 (b), 3-018, 33-004(e,f), 36-003(c), 39-006(b), 52-002 (f), and 1-001(j).

The following SWMUs have AP 4.5 scores indicating the erosion potential scores are low. **SWQB concurs on approving these site for removal** from the DOE/LANL RCRA permit because the current information indicates they do not pose a substantial surface water threat:

3-020(a), 14-004(b), 16-012(a-h), 16-025(c), 16-026(i2), 16-031(g), 16-034(g), 21-024(m), 16-006(f), 39-003 and 52-002(b).

**The SWQB has individual recommendation/comments on the following SWMUS:**

**0-005 Landfill**

Because this is a landfill and no verification sampling has been done at the site, SWQB is concerned that constituents other than rad may have been disposed at this site. SWQB would recommend a AP 4.5 be conducted at this site before making a final decision on eligibility for NFA.

**3-009(f) Surface Disposal**

The description of the site (" a few concrete pieces visible along the bank") suggests that some of the disposal may be in the watercourse and thus a potential violation of section 2201 of the WQCC regulations. An AP 4.5 should be conducted at this SWMU.

**3-012(a)**

This site has an erosion potential score of 43.3. Part of the reason for the high score is a result of the site having a 30% slope and visible evidence of runoff. The runoff is to a natural channel which at the time of the assessment did not display signs of erosion. The channel was also well defined and vegetated so that an immediate concern for sediment transport was minimal. Natural drainage patterns are not directing storm water onto the SWMU. However, NPDES outfall (EPA 03A022) is located above the SWMU and acts as a run-on source to the site by discharging cooling tower blowdown water from TA-3-2238. NPDES records indicate that a maximum discharge of 32,400 gallons per year will flow from this outfall. In addition, approximately 600 gallons per year of potable water for fire protection will be discharged through the outfall. Based upon this information and the fact that the area below the outfall is rather stable, and that HRMB has determined no hazardous waste has been managed at the site, SWQB concurs with the determination of NFA. However, if future data indicate the site has become a conduit for

## **SWQB Comments: 99 NFA Sites**

**November 25, 1998**

**Page 3**

transport of hazardous materials, SWQB requests that HRMB notify them in order that the appropriate actions can be taken to correct the situation.

### **11-007 Surface Disposal**

This site does not have an erosion assessment score. The information provided in the NFA proposal indicates that the surface disposal area is located at the head of a small drainage and that it contained some road-building refuse. It is not clear whether the building refuse was located in the watercourse. SWQB recommends that the site have an AP 4.5 assessment and review to determine if there is a violation of Section 2201 (refuse in a watercourse) of the Water Quality Control Commission (WQCC) Regulations.

### **16-005(f) Decommissioned Septic System**

This SWMU consists of a septic tank, drain line, and outfall located NE of TA-16-260. Process knowledge indicates that the septic tank was probably only used for sanitary waste, however, this was not verified (no soil sampling, or surface water/sediment samples have been taken). Erosion assessment of this site provided a high score (AP 4.5 score is 84.3). This score reflects the significant amount of gully erosion at the site observed along the sides of the outfall drainage channel which dissects an adjacent SWMU (16-019- MDA-R). MDA-R is scheduled for Phase 1 sampling for FY 99. The Surface Water Assessment Team (SWAT) reviewed the AP 4.5 assessment and recommended that the visible refuse observed at the site and in the watercourse during the assessment be removed. In addition, SWAT recommended BMPs (riprap, geotextile along banks and/or a few dissipation devices) be installed to address the erosion in the outfall drainage channel. SWQB concurs with the removal of the septic tank and leachfield from the permit, however, the Bureau remains concerned about the significant erosion in the outfall drain channel which runs through MDA-R. SWQB requests that the BMPs recommended by SWAT be installed and maintained in order to prevent further erosion and the migration of contaminated sediments from MDA-R to the watercourse. In addition, surface water monitoring should be done below the site to verify the effectiveness of the BMPs. The AP 4.5 also indicated refuse present in the watercourse. Failure to remove this refuse would constitute disposal of refuse which is a violation of Section 2201 of the Water Quality Control Commission (WQCC) Regulations. Therefore, the refuse should be removed before the SWMU is removed from the RCRA permit. In addition, the Phase 1 sampling scheduled at MDA-R should not be postponed.

### **16-032(e) Decommissioned HE Sump**

Although this SWMU has not been assessed for erosion potential, SWQB concurs with HRMB concerning removal of this SWMU from the RCRA permit. The site had been misidentified as a decommissioned HE sump and actually was a water pump pit. Therefore, it does not seem to pose a threat to surface water.

**35-003(i) Surge Tank at Wastewater Treatment Plant (TA-35)**

SWQB concurs with HRMB although this site was not evaluated for erosion potential. This decision is based on the NFA information HRMB evaluated which indicates that the tanks were never associated with the wastewater treatment plant and were used only to hold helium and nitrogen gases.

**52-001(a,b,c) UHTREX Equipment**

SWQB requests an AP 4.5 erosion potential assessment be conducted at this SWMU. Although the site was cleaned up to DOE guidelines for radioactivity, SWQB requires verification that the radioactivity remaining in the soil has no potential to enter the watercourse as refuse.

**54-001(c) Storage Area Tank**

SWQB concurs with HRMB's assessment that this SWMU can be removed from the RCRA permit based on information that the tank proposed for the storage of waste oil and hazardous materials at MDA L was never used.

**1-001(j) Septic Tank**

This SWMU was actually an aboveground tank used for the storage of dielectric gas and not a septic tank. HRMB indicates the tank was removed according to UST regulations and that the tanks integrity was confirmed. SWQB therefore concurs with the decision to remove this SWMU from the permit although no erosion potential evaluation was conducted at the site.

**3-039 (a) and 8-007 Silver Recovery Units**

No erosion potential assessment is required for these sites and the SWQB concurs with HRMB's decision to remove them from the permit. This decision is based on the NFA information which indicates the units were contained within buildings during the entire time of their operations and no spills or leaks associated with the units were reported.

**16-012 (o,q,v,w,y,z) Container Storage-Rest House**

SWQB will not require AP 4.5 assessment at these sites and concurs with HRMB's decision to remove these SWMUs from the RCRA permit because: 1) the AP 4.5 scores at SWMUs located in the same area were low (AP 4.5 scores were 15.3); 2) the container storage-rest houses had no exterior drains, and 3) recent field screening indicated no HE material leaked and/or spread from the container storage-rest houses.

## **SWQB Comments: 99 NFA Sites**

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### **16-025(g2) Magazine**

This SWMU is a building which is now under or in the immediate vicinity of a disturbed soil area associated with the construction of State Road 501. It had been used for the storage of non-HE materials such as aluminum powder, lead oxide, and barium nitrate and was destroyed in 1950. SWQB is concerned that no sampling of the disturbed area associated with the construction of State Road 501 was conducted. There is no evidence from the information provided that the non-HE material had not been released from the site. In addition, no AP 4.5 has been conducted at the site to provide SWQB with an assessment for erosion potential. SWQB therefore recommends an AP 4.5 be conducted at this site and that verification in the form of sampling and/or process knowledge which indicates no releases occurred at this SWMU.

### **53-007(b) Aboveground Storage Tanks**

These tanks contained waste solvents, organics and carcinogens. Both tanks were located below the hot cell room in Experimental Area A of building TA-53-3. Both also had waste lines. SWQB is concerned that there is no clear evidence that a release did not occur. Also, since the tanks were connected to waste lines, SWQB is concerned that these lines may have discharged to the environment and thus potentially contaminate surface water. SWQB recommends an AP 4.5 be done at the site to identify whether any potential soil erosion problems associated with the waste lines exist.

### **Storage Areas, TAs 3, 14, 16**

The following SWMUs out of a list of 15 had **AP 4.5 assessments which resulted in low scores:**

**14-004(b), 16-012(i), and 16-012(t).** SWQB concurs that these SWMUs can be removed from the RCRA permit.

Although HRMB characterized all 15 SWMUs as eligible for removal from the RCRA permit due to cleanup of contaminants at these sites to an acceptable RCRA level of risk, SWQB requests that the 12 SWMUs without AP 4.5 scores be assessed for erosion potential. SWQB believes that without the AP 4.5 scores, evaluation of the risk to surface water contamination due to the level of contaminants left in place is not possible. Therefore, SWQB can not recommend the following SWMUs be removed from the RCRA permit at this time.

**3-001(a,b,c), 3-002(b), and 16-012(i,j,l-p,u,x)**

**3-035(a) Underground Storage Tank**

SWQB concurs with HRMB's decision to remove this SWMU from the RCRA permit for the reason stated in the NFA proposal, and will not require an AP 4.5 assessment at this site.

**3-035(b) Underground Storage Tank**

SWQB concurs with HRMB's decision to remove this SWMU from the RCRA permit. This decision is based on the information provided in the NFA proposal which indicate there were no leaks reported at this site and therefore no potential releases to surface water.

**15-014(m) Active Drainline and Outfall**

This SWMU has an AP 4.5 assessment score of 21.5, therefore, the erosion potential is low. The SWMU is categorized in the NFA proposal as a SWMU with releases that were characterized and/or remediated under another authority which adequately addressed corrective action. SWQB is not aware of any NPDES corrective action associated with this SWMU, and can not verify there were no releases of contaminants from the outfall. SWQB will concur with HRMB for the removal of this SWMU from the RCRA permit, however, if the SWAT review of the erosion assessment reveals there are problems at the site SWQB will request that this SWMU be reinstated onto the RCRA permit.

**16-010(g) Wastewater Treatment Facility**

This SWMU has an AP 4.5 score of 46, therefore, the erosion potential is medium. The SWMU is categorized in the NFA proposal as a SWMU with releases that were characterized and/or remediated under another authority which adequately addressed corrective action. SWQB is not aware of any NPDES corrective action associated with this SWMU, and can not verify that there were no releases of contaminants from the outfall. There is no surface water/sediment information for this SWMU. SWQB recommends the erosion problems be addressed at this site before it is removed from the permit.

**3-020(a) Disposal Pit**

The AP 4.5 score at this site is 3.6, therefore, the erosion potential is low. In addition, although there was a release at this site, the contaminated soil was removed to comply with the UST regulation limits, and the area was graded and paved as part of a parking lot. Therefore, potentially remaining residues are inaccessible for contamination to surface waters. SWQB concurs with the decision to remove this SWMU from the RCRA permit.

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**21-027(b) Drainline**

The AP 4.5 score for this SWMU is 47, therefore, the erosion potential for this site is medium. The NFA proposal indicates this SWMU is a drainline that was used for storm water diversion from a bermed area associated with a fuel tank. The AP 4.5 indicates there are actually two outfalls. One is an active NPDES outfall (03A034) which discharges treated cooling water from TA-21-166 and TA-21-167 to the south edge of DP Mesa. The second outfall was identified as an outfall discharging south into LA Canyon from a cooling tower associated with TA-21-152. The NFA proposal indicated that sampling at the site found no organic analytes present, however, radionuclides were elevated, but not above baseline for the TA-21 baseline value. SWQB was not aware that TA-21 baseline values for rad have had been approved by HRMB. SWQB is concerned that TA-21 baseline values are higher than the facility established baseline values for rad and that does not reflect an adequate protection of surface water. Therefore, SWQB does not recommend this SWMU be approved for removal from the RCRA permit until the erosion potential at this site is addressed adequately, and the SWQB concerns associated with the TA-21 rad levels are resolved.



GARY E. JOHNSON  
GOVERNOR

December 23, 1998

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PETER MAGGIORE  
SECRETARY

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Surface Water Quality Bureau  
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**RE: Comments on Notice of Intent to Approve a Modification to RCRA Permit No. NM0890010515 US Department of Energy/Los Alamos National Laboratory (LANL), New Mexico**

Dear Dr. Davis:

This letter is in response to the Surface Water Quality Bureau (SWQB) comments, dated November 25, 1998, to the referenced document above. The Public Comment period ended on December 4, 1998 and the Hazardous and Radioactive Material Bureau (HRMB) is responding to SWQB comments. HRMB appreciates the time SWQB spent on reviewing and providing comments.

SWQB comments are based on the fact that erosion potential scoring (AP 4.5) has not been performed for several sites or that the AP4.5 score is high. HRMB realizes the importance of the AP 4.5 scoring for evaluation of sites with surface water concerns. HRMB has evaluated the 99 referenced sites for no further action (NFA) and found them to be appropriate for NFA with regard to RCRA and HRMB concerns. HRMB is concerned with the potential migration of hazardous constituents which may pose a threat to human health and the environment and concurs with SWQB that AP 4.5 scores should be performed for the sites where there is an indication for the presence of hazardous constituents. The information provided by LANL indicates that the majority of the sites included in this notice of intent did not manage or receive hazardous constituents and are appropriate for NFA. Attached is a response to site specific concerns expressed by SWQB regarding these SWMUs.

If you have any questions regarding this matter please call me at 827-1567 or Mr. John Kieling at 827-1558 extension 1012.

Sincerely,

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

RSD:jek

attachment

File: RED LANL G/P/98 and HSWA LANL G/P/98  
Track: LANL, 12/23/98, na, SWQB/Davis, HRMB/Dinwiddie, RE, File

**Attachment**  
**Response to SWQB on Notice of Intent to Approve a Modification for RCRA Permit**

The following is a response to SWQB comments.

1. SWQB has concurred with HRMB that the following SWMU's are appropriate for NFA:  
1-001(i,j,k,n), 3-009(b,c), 3-009(e), 3-009(h), 3-012(a), 3-020(a), 3-035(a,b), 3-039(a), 7-003(c), 7-003(d), 8-006(b), 8-007, 14-004(b), 15-014(m), 16-005(I), 16-006(f,i), 16-012(a,b,c,e,f,g,h,i,k, o,q,r,s,t,v,w,y,z), 16-025(c), 16-026(i2), 16-031(g), 16-032(d,e), 16-034(g), 21-012(a), 21-024(m), 35-003(I), 39-003, 40-001(a), 46-008(c), 52-002(b,c,d), 54-001(c), and 54-013(a).
2. SWMU's that are duplicates or are to be investigated as part of another SWMU will be addressed for NFA at a later date. HRMB will work with SWQB in achieving AP 4.5 scores from DOE/LANL for those SWMUs.
3. The following SWMU's are septic systems which have associated an outfall, for which SWQB has expressed concerns since AP 4.5 scoring was not done. These sites are appropriate for NFA based on the evidence that they did not manage or receive hazardous waste. The erosion concerns of SWQB can be addressed through Water Quality and Hydrology Group (ESH-18) at LANL. ESH-18 has agreed to work with SQWB and perform AP 4.5 evaluations on these sites, if warranted.

1-001(h,l)	Septic tanks #s 142, 269 and drainlines-no longer exist
9-003(f)	Settling tank and drainlines-no longer exists
9-005(b,c,e,f,h)	Septic tank and drainlines-sanitary waste only
9-007	Basket pit and drainlines-no longer exists

4. The following SWMU's do not have any additional components such as an outfall and do not "day-lite" to the environment and did not manage or receive hazardous constituents, hence are appropriate for NFA:

3-018	Cesspool-never used
8-003(b,c)	Septic tank, drainline, leachfield or seepage pit-sanitary waste only
9-003(c)	Electric control manhole-no longer exists
16-005(o)	Septic tank and drainline and drainfield-sanitary waste only
16-006(b)	Septic tank and drainline and leachfield-sanitary waste only
33-004(e)	Septic tank and drainline and drainfield-no longer exists
33-004(f)	Septic tank and drainline-tank pumped-did not discharge
36-003(c)	Septic tank, drainline, seepage pit-sanitary waste only
39-006(b)	Septic tank and drainline distribution box and leachfield-sanitary waste only
52-002(f)	Septic tank, seepage pit-tank pumped-did not discharge

5. The following SWMU's address specific concerns expressed by SQWB:

**SWMU 0-005 Landfill**

Based on the information provided by LANL to HRMB this area was a garden, only used for an experimental study to examine the transport of radioactive particulates from the ground surface to tomato plants as a result of rain splash between 1976 and early 1980s. Four short-lived radio

nuclides, TA-182 (half life 115 days), Ce-141 (half life 33 days), Sb-124 (half life 60 days), and Sc-46 (half life 84 days) were used in these experiments, which have long since decayed to negligible levels. No hazardous materials were used at this site. This site is appropriate for NFA because it has never been used for the management of RCRA solid or hazardous wastes and/or constituents. An AP 4.5 is pending according to the surface water assessment site list.

#### SWMU 3-009(f) Surface Disposal

Based on the information provided by LANL this site was never associated with the management of hazardous waste and/or constituents. The SWMU consists of road fill and a few concrete pieces. SWMU 3-009(f), a surface disposal area is appropriate for NFA because it never managed any RCRA solid or hazardous waste.

#### SWMU 11-007 Surface Disposal

SWMU 11-007 is a surface disposal area containing large blocks of concrete and road building debris. It has never been used for management of RCRA hazardous wastes and/or constituents, therefore is appropriate for NFA. Concerns regarding violation of Section 2201 of the Water Quality Control Commission Regulations should be forwarded to LANL by SWQB.

#### SWMU 16-005(f) Decommissioned Septic System

Based on the information provided by LANL this site was never associated with the management of hazardous waste and/or constituents. The SWMU consisted of a 1500 gallon septic tank, associated line, distribution box and outfall connected to several bathrooms along the west side of building TA-16-260. The septic tank was monitored and found to be free of radioactive contamination and a high explosives hazard. This tank was abandoned in 1952 for the bathrooms from this building were connected to the site-wide sanitary waste water treatment system. This SWMU is appropriate for NFA as it has never been used for the management of RCRA hazardous waste and/or constituents.

#### SWMU 52-001(a, b, and c) UHTREX Equipment

Based on the process knowledge, SWMUs 52-001(a, b and c) were never used for management of nonradioactive hazardous constituents. The sites underwent D&D in 1989 and were decontaminated to levels below DOE guidelines for radioactivity, the sites are appropriate for NFA. Radioactive contamination remaining in the soil and its potential for entering the watercourse as refuse is strictly a SWQB concern. An AP 4.5 is pending according to the surface water assessment site list. These SWMUs are appropriate for NFA as they have never been used for the management of RCRA hazardous waste and/or constituents.

### SWMU 16-025(g2) Magazine

SWMU 16-025(g2) was a storage building constructed in 1944 and destroyed in 1950. It was located on the western edge of S-Site. There were never any documented cases of a release to the environment at this location. The area around the SWMU has been disturbed during construction of the State Road 501. According to LANL, the building TA-16-108 is probably under the State Road 501 which is elevated and fully graded for drainage. Construction of the road involved moving large quantities of soil that would have dispersed any of the remains from this SWMU.

### SWMU 53-007(b) Aboveground Storage Tanks

SWMU 53-007(b) is identified as two tanks located in the hallway below the hot cell room of building TA-53-3. Both tanks were installed on the concrete floor of the hallway in 1974. One tank was stainless steel and the other was fiberglass. The fiberglass tank was never used. The stainless steel tank was used for small-scale dissolution experiments and may have contained waste solvents, organics and/or carcinogens. Liquids for the experiment were piped via glass tubing from the hot cell to the stainless steel tank; the wastes were then picked up by EM-7 for disposal as there was no outlet drain from the tank. Both tanks have been dismantled and removed from TA-53-3. Based on information provided by LANL there have been no documented releases or spills associated with these tanks. Since these tanks were located inside the building, secondary containment systems-floor drains connected to the radioactive liquid waste system and a catch basin in the truck loading area outside the building would have captured any leakages. These containment systems are part of PRSs 53-006(b and c). SWMU 53-007(b) is appropriate for NFA because no release to the environment has occurred at this site.

### Storage Areas, TAs 3, 14, and 16

The following SWMU's are regulated by RCRA through 40 CFR 262 standards as less-than-ninety day storage areas and satellite accumulation areas. These sites are visited as part of facility wide inspections done through HRMB's Enforcement and Inspection Program in addition to institutional controls and maintenance.

SWMU 03-001(a)	Less-than-ninety-day	TA-3, Former Operable Unit 1114
SWMU 03-001(b)	Satellite Accumulation Area	TA-3, Former Operable Unit 1114
SWMU 03-001(c)	Less-than-ninety-day	TA-3, Former Operable Unit 1114
SWMU 03-002(b)	Satellite Accumulation Area	TA-3, Former Operable Unit 1114
SWMU 16-012(d)	Satellite Accumulation Area	TA-16, Former Operable Unit 1082
SWMU 16-012(j)	Satellite Accumulation Area	TA-16, Former Operable Unit 1082
SWMU 16-012(l)	Satellite Accumulation Area	TA-16, Former Operable Unit 1082
SWMU 16-012(m)	Satellite Accumulation Area	TA-16, Former Operable Unit 1082
SWMU 16-012(n)	Satellite Accumulation Area	TA-16, Former Operable Unit 1082
SWMU 16-012(p)	Less-than-ninety-day	TA-16, Former Operable Unit 1082
SWMU 16-012(u)	Satellite Accumulation Area	TA-16, Former Operable Unit 1082
SWMU 16-012(x)	Satellite Accumulation Area	TA-16, Former Operable Unit 1082

#### **SWMU 16-010(g) Wastewater Treatment Facility**

The drainage from this filter/treatment unit is permitted under NPDES Permit number 05A055. There has been no corrective action associated with this SWMU, it was put under criterion 4 because that was the best category it could fit under.

#### **SWMU 21-027(b) Drainline**

HRMB has evaluated the nature and extent of soil contamination at this SWMU and found no excessive health risk to human and ecological receptors from potential exposures to the contaminants found at this site. SWQB is correct in that the TA-21 baseline values for radio nuclides proposed by LANL have not been approved by HRMB. The TA-21 baseline values were not used in this evaluation on which HRMB is basing its decision.