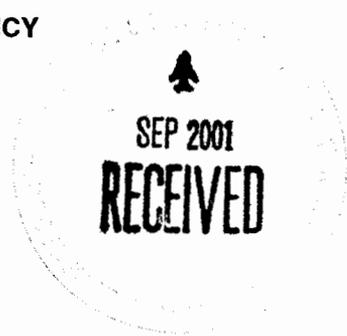




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

SEP 7 2001



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Mr. James Bearzi, Chief
Hazardous and Radioactive
Materials Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Bldg. 1
Santa Fe, NM 87505-6303

HSWA LANL G/P/2001 'NFA'

Re: Comments on the Permit Modification Request - No Further Action Proposal, ER:2000-0363, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Bearzi:

The Environmental Protection Agency (EPA) has reviewed LANL's Permit Modification Request - No Further Action Proposals dated June 2001 and offers the enclosed comments. Should you have any questions regarding the comments, please feel free to contact Mr. Rich Mayer at (214) 665-7442.

Sincerely,

for

David W. Neleigh, Chief
New Mexico and Federal
Facilities Section

Enclosure



15956

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Comments on LANL's Permit Modification Request - No Further Action Proposals

Below are EPA's comments on the 25 SWMUs proposed for No Further Action.

SWMUs 00-011 (a,e)

These SWMUs are former mortar impact areas located in Rendija Canyon. It appears that LANL has gone through the proper process of investigating an ordnance impact area, which includes an ordnance surface sweep, a geophysical survey, and soil sampling for metals and high explosives. Soil samples were taken from areas where ordnance or ordnance fragments were removed.

However, the NFA request did not include the actual geophysical maps from the geophysical survey, so EPA could not determine the technical adequacy of the survey. In addition, EPA could not determine the technical adequacy of the ordnance sweeps performed at both sites.

Summary: Even if you assume that LANL's investigation of the SWMUs were technically adequate, there is still some uncertainty whether all UXO has been removed at these SWMUs. The reason being that even when you use the best UXO investigation technology, UXO investigations on average only identify 60-80% of UXO or UXO fragments at a site. EPA recommends that institutional controls be placed on this property to prohibit digging/excavations/construction without first having a site specific survey of the area to be disturbed. The control should also warn recreational users of the potential hazards.

SWMU 01-001(m)

This SWMU was a planned septic tank for Building TA-1-97. The NFA proposal claims that the septic tank was never installed.

Summary: EPA believes that LANL has made a good faith effort to demonstrate that the tank was never installed and agrees with LANL's NFA proposal. The reasons are: 1) LANL as built drawing generated in 1948 and confirmed in 1953 contains no plumbing fixtures or drains; 2) Ahlquist et al. in 1977 determined that the elevation of the area where the tank was purported to be located was bulldozed below the elevation where the tank should have been installed; and, 3) An Aug. 9, 2000 site visit identified no open or plugged penetrations in the floor, foundation, and stem walls or other indications that water or plumbing ever service the building.

SWMU 03-046

This SWMU is an active aboveground wastewater neutralization tank located in TA-3, near the steam plant. The wastewater comes from water boilers, softeners, and a demineralization tank. LANL claims that the wastewater does not meet the definition of a RCRA solid waste and that the tank has never had a release.

Summary: Before EPA can agree with the proposal, LANL should provide a sample analysis of the wastewater entering the tank demonstrating that it contains no hazardous waste or hazardous constituents above a concern level. Also, LANL should verify that the tank has only received the wastes identified above throughout the life of the tank.

SWMU 08-005

This SWMU is an inactive incubator (4'X4') used to grow crystals for photographic equipment experiments located at TA-8. It was later removed and re-located outside of building TA-8-1.

Summary: EPA agrees with the NFA proposal. A soil sample were taken underneath the incubator indicating that no release has occurred from the incubator.

SWMU C-08-010

This SWMU is a former drum storage area (6' by 12' wooden structure) approximately 100 feet north of Building TA-8-1.

Summary: Four soil samples from two locations were taken within the boundary of the SWMU. Sampling results indicated no release; however, there is a disagreement between LANL and NMED on the sampling depths taken; therefore, EPA cannot make a recommendation until there is a resolution between the parties.

SWMU 14-003

This SWMU is an area formerly used to burn detonation debris (5' by 20' foot horseshoe area) contaminated with HE.

Summary: A VCA was performed which removed approximately 19 cubic yards of contaminated soil. Confirmation sampling indicated contaminants were removed. EPA agrees with the NFA proposal. The reasons are: 1) Lateral and vertical extent of contamination was determined within and outside of the SWMU; 2) elevated areas of contamination were removed; 3) noncontaminated fill was placed over the SWMU; and, 4) no ecological problem since contaminants were removed and fill placed over SWMU.

SWMU 15-010(c)

This SWMU is an active storm drainline that channels storm water from the exterior of Building TA-15-92 toward its associated outfall at the edge of water canyon.

Summary: EPA agrees with NFA proposal. The reasons are: 1) Since its installation in 1950, the drainline has always been an active stormwater drain serving an exterior stair landing at Bldg. TA-15-92 and never receiving wastes; and, 2) no drains exit within Bldg. TA-15-92.

SWMU 15-014(l)

This SWMU is an active outfall and associated drainline from the cooling tower located at TA-15 and is a permitted NPDES outfall. The effluent consists of noncontact cooling water.

Summary: EPA agrees with the NFA proposal. Antiscalent/corrosion inhibitors are the only chemicals added to this water. These chemicals are not listed in the Appendix VIII list of hazardous constituents or meet the criteria for hazardous waste. EPA recommends that NMED ask LANL if these are the only chemicals ever used at the cooling tower. The NFA proposal did not specifically address this concern.

SWMUs 16-025(e2,f2,h2)

These SWMUs are three former storage buildings (magazines) that were removed in 1950. The former sites are located currently under State Highway 501.

Summary: EPA agrees with the NFA proposal. Reasons are: 1) no evidence indicating that the buildings had releases; 2) sites are either covered by the road or the soil under the buildings have been disturbed where it would be difficult to take an appropriate sample; 3) buildings have been demolished for 51 years.

SWMU 16-026(a2)

This SWMU is an active storm outfall from the roof drains of an administrative building at TA-16, building TA-16-200.

Summary: EPA agrees with the NFA proposal. The reasons are: 1) since the time of its construction, the SWMU has received only rainwater from 13 roof drains, no hazardous waste or hazardous waste constituents have been released from the SWMU; and, 2) floor drains in building TA-16-200 are not tied to the roof drains but are connected to a separate line which is tied to the sanitary sewer.

SWMUs 16-026(d2,e2,f2,g2,h,k,x) AND 16-030(b,e,f)

The above SWMUs are floor drains in the utility rooms of HE rest houses and their associated drainlines. The utility rooms of the rest houses are separate from the HE rest storing rooms.

Summary: EPA agrees with the NFA proposal. The reason being that the utility rooms of the rest houses are separate from where the HE was stored. Also, there could have been de minimus loss of oil from the compressors; however, this would be a very small volume which would not impact the environment.

SWMU 16-026(t)

This SWMU is an active storm outfall and associated drainline from the roof drains of Building TA-16-207.

Summary: EPA agrees with the NFA proposal. The reason being: 1) the storm drain system and associated outfall has managed only rainwater from roof drains of Building TA-16-207; and, 2) all other drains in the building are tied into the sanitary sewer system.

SWMU 20-003(a)

This SWMU was a former control building that supported test-firing operations at a technical area that no longer exists.

Summary: EPA agrees with the NFA proposal. The reason being: 1) the building was never used for the storage of hazardous waste or hazardous constituents; and, 2) the building was used for a maximum of 3 years, demolished in 1948.