



## Department of Energy

Los Alamos Area Office  
Albuquerque Operations Office  
Los Alamos, New Mexico 87544

JUL 05 1994

Mr. William Honker, Chief  
RCRA Permits Branch  
U. S. Environmental Protection Agency  
Region 6  
1445 Ross Ave., Suite 1200  
Dallas, Texas 75202-2733

RE: NOTIFICATION OF TWO NEW SOLID WASTE MANAGEMENT UNITS AND SIX NEW AREAS  
OF CONCERN FOR OPERABLE UNIT 1071

Dear Mr. Honker:

The U. S. Department of Energy (DOE), Los Alamos Area Office (LAAO), is writing to notify the U. S. Environmental Protection Agency (EPA) of the discovery of two new Solid Waste Management Units (SWMU) and six new Areas of Concern (AOC). These units are all located outside the facility boundaries of the Los Alamos National Laboratory (LANL) on currently private or public land that was previously owned and operated by the Atomic Energy Commission (AEC). The units will be included in the investigation activities for Operable Unit (OU) 1071. We are making the recommendation for designation and investigation as follows:

### The Two New SWMUs

We are notifying EPA of the new SWMUs as required by the Hazardous and Solid Waste Amendments module of the Resource Conservation and Recovery Act (RCRA) permit currently held by the LANL facility. The two new SWMUs and their tentatively assigned SWMU numbers are the following:

- SWMU 0-039: site of two former tetrachloroethene Underground Storage Tanks (UST).
- SWMU 0-040: site of a former diesel UST.

These SWMUs are located in the area of the Los Alamos Community Center. The private owner of the land undertook activities to remove the tanks mentioned above, and other additional tanks in the area, during May and June of 1993. Five tanks at four locations were removed. The four locations are shown on Figure 1 (Enclosure 1).

The tanks at two of the locations did not leak. At one location, the tank was a small 500 gallon gasoline tank, and at the other, a used oil tank. A diesel tank, which had leaked, was removed at a third location. Excavation removed most of the contamination. All three of these sites were determined to require no further action by the New Mexico Environment Department (NMED)



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UST Bureau in July 1993. Enclosure 2, which is a letter to this effect from NMED UST to the private land owner, Mr. Tom Netuschil, is provided to you for documentation of this determination.

Although the diesel tank site was closed, we are tentatively designating the location as SWMU 0-040 because it meets the definition of such a unit under current RCRA regulations. However, since the NMED UST Bureau has already determined that no further action is required at the site, we are also recommending that the unit not be placed on the permit. With your approval, this would also mean that the unit would not undergo any further investigation or remediation.

The fourth location, tentatively designated as SWMU 0-039, is the location of the two former USTs which stored solvent and which also leaked. An attempt was made in July 1993 to remove all the contaminated soil, but the effort was abandoned before completion due to mechanical limitations and an associated potential of property damage. Instead, a decision was made between the property owner and the NMED UST Bureau to pursue a sampling effort to define horizontal and vertical extent of contamination, pursuant to NMED UST regulations<sup>1</sup>, as a first step after the attempted remediation of contaminated soil. Sometime after the decision was made, Mr. Netuschil approached DOE and asked that we consider assuming this current responsibility.

Because the solvent tanks were owned and operated by the AEC, DOE has decided to assume the responsibility for further activity at the site. In addition to notifying you of this change in responsible party status, which includes a request that SWMU 0-039 be placed on the permit, we are also informing you of our obligation to cooperate with the NMED UST Bureau to develop a sampling and analysis plan which will meet their requirements for defining the nature and extent of contamination. They have requested that we attempt to do this within the near future. We will also send you a copy of this plan for your concurrent approval, when it has been developed.

#### The Six AOCs

Six AOCs have also been recently discovered in Bandelier National Monument. The locations and their associated AOC numbers are shown on Figure 2 (Enclosure 3).

Four of the locations are the sites of small borrow pits which contain debris that appears to have been associated with road construction. The AOC numbers for these sites are C-0-036(a), C-0-036(b), C-0-036(c), and C-0-036(d). Inspection of debris exposed at the surface has shown the presence of steel cable, cement, culvert piping sections, part of an automobile, asphalt, and coal/slag debris. The material is believed to have originated

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<sup>1</sup>Section 1205C of NMED UST regulations.

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as the result of LANL activities because a sign inscribed with "TA-41" was found at C-0-036(b); a hubcap with a radiation count of six times background was also found and removed from this location. This pit was originally discussed in the OU 1144 Work Plan, although a unit number was not tentatively assigned.

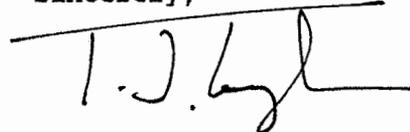
The fifth AOC, C-0-037, is a former landfill. The surface area dimensions of the landfill are approximately 75 feet by 1300 feet. Records indicate that it was used from at least the 1950s to the late 1960s, and a 1958 aerial photograph shows land disturbance at the location. Visual inspection of the unit indicates that it contains asphalt, cement, and other construction rubble. Ownership of the property on which the unit is located changed in 1959 from the AEC to the National Park Service. Investigations planned at the landfill should indicate if any LANL waste is disposed in the unit. If LANL waste is found in the landfill, we will notify you of the discovery of a new SWMU.

The sixth AOC, C-0-038, is a surface disposal location. The unit is adjacent to AOC-0-037, but much smaller in size. A rock pile appears to have been deliberately placed over the debris in the unit.

We believe the AOCs described above do not currently pose an immediate threat to human health or the environment. Therefore, the development of sampling and analysis plans to determine the nature and extent of contamination, if any, associated with the six AOCs will be deferred until the following fiscal year. All such plans will be submitted for your approval as an addendum to the OU RCRA Facility Investigation Work Plan for OU 1071.

Should you have any questions, please contact me at (505) 665-7203, or Court Fesmire at (505) 665-4718.

Sincerely,



Theodore J. Taylor  
Program Manager  
Environmental Restoration Program

LESH:4TT-017

Enclosures

cc:  
See page 4

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cc w/enclosures:

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J. Schoeppner

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K. Boardman, ERPO, AL

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cc w/o enclosures:

T. Baca, EM-DO, LANL, MS-J591

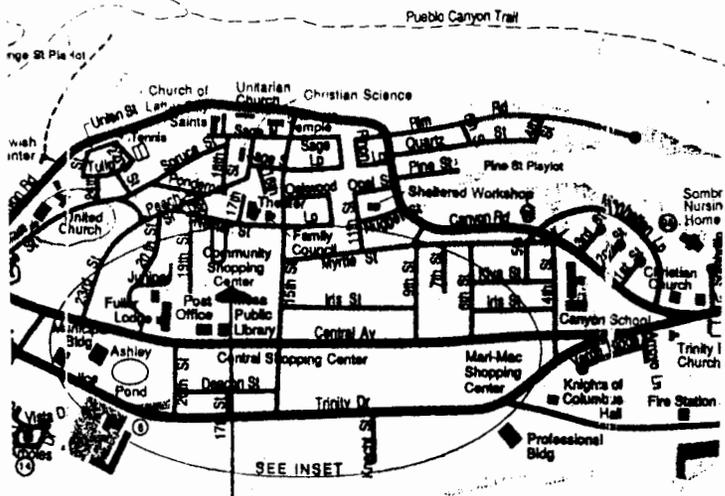
J. Jansen, EM/ER, LANL, MS-M992

D. McInroy, EM/ER, LANL, MS-M992

J. Aldrich, EES-1, LANL, MS-D462

RPF, LANL, MS-M707

**LOS ALAMOS**



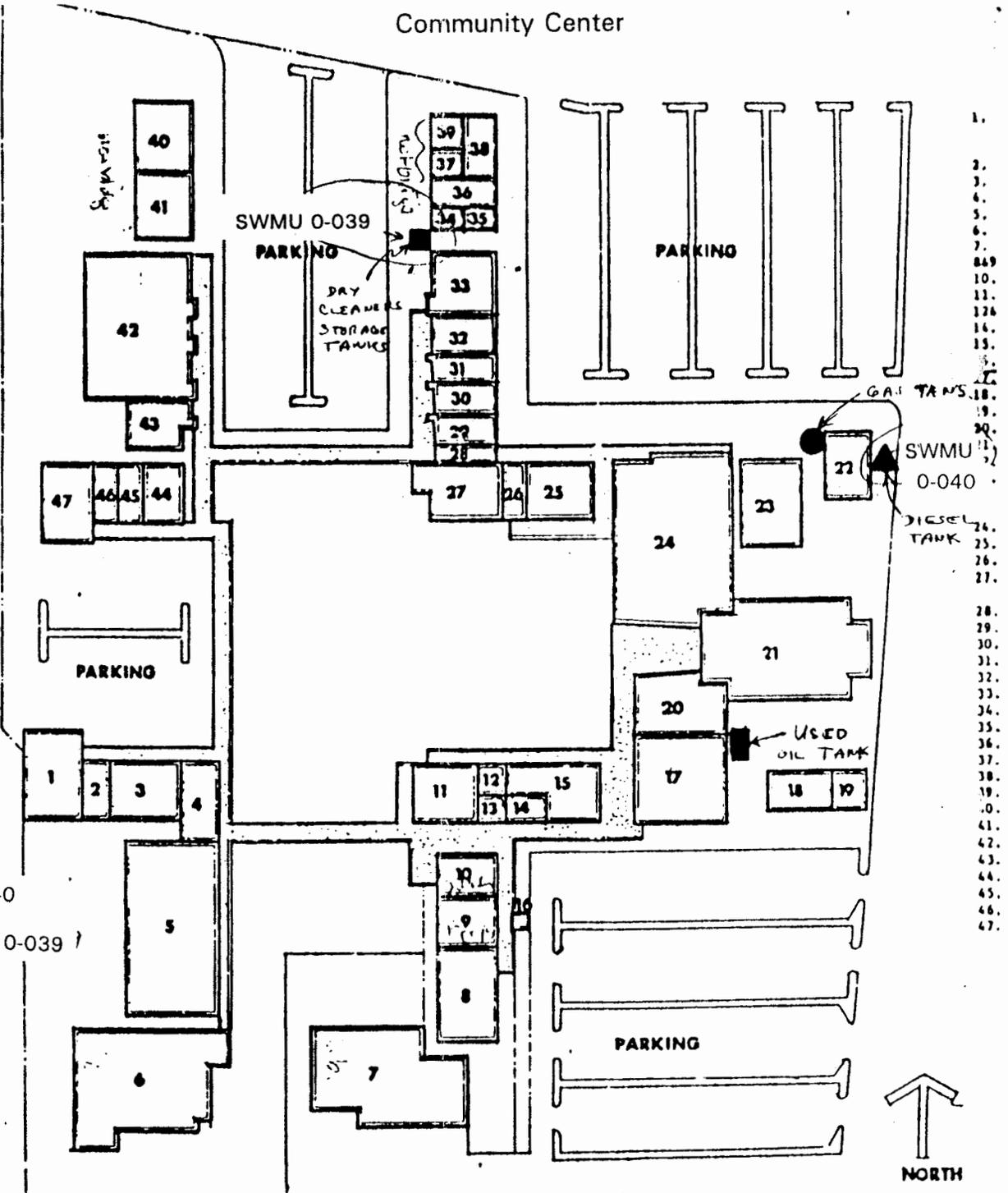
Location of Community Center

TA-2 and TA-41 (LANL)

**LEGEND**

- ▲ Diesel-tank Pit 0-040
- Dry Cleaners-tank Pit 0-039
- Gasoline-tank Pit
- OIL TANK PIT

Enclosure 1



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