



Department of Energy
Field Office, Albuquerque
Los Alamos Area Office
Los Alamos, New Mexico 87544

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

RE: Additional Information Requested For C-0-037 and C-0-038

Dear Mr. Honker:

This letter is in response to your request of July 21, 1994, in which you asked for additional information on Area of Concerns (AOC) C-0-037 and C-0-038 by August 19, 1994. We understand that your request is focused on a further need to determine whether the units are to be designated Solid Waste Management Units (SWMU) rather than AOCs.

All available information is summarized on the enclosures which accompany this document. This package includes a one-page description of each unit and a location map.

Your letter of July 21, 1994, also requested that consideration be given to whether the units should be signed or posted since they are located near an area used for recreation. To make this determination, we have again made a thorough review of our archival data. As indicated on the enclosures, it strongly suggests that the units probably contain only solid waste and therefore pose no threat. We have also discussed the issue with Mr. Roy Weaver of the National Park Service at Bandelier National Monument. He is also of the opinion that the units pose no threat and prefers, at this time, to leave them unposted.

We are currently in the process of preparing a plan to sample C-0-037, the BNM Landfill. We anticipate that it will be finalized sometime within the next two months, at which time we will submit it to you for review. Pending your approval, our plan includes a proposal to first sample the portions of the unit identified in a 1958 aerial photo, since it would be the area most likely to contain laboratory-related waste, if any.



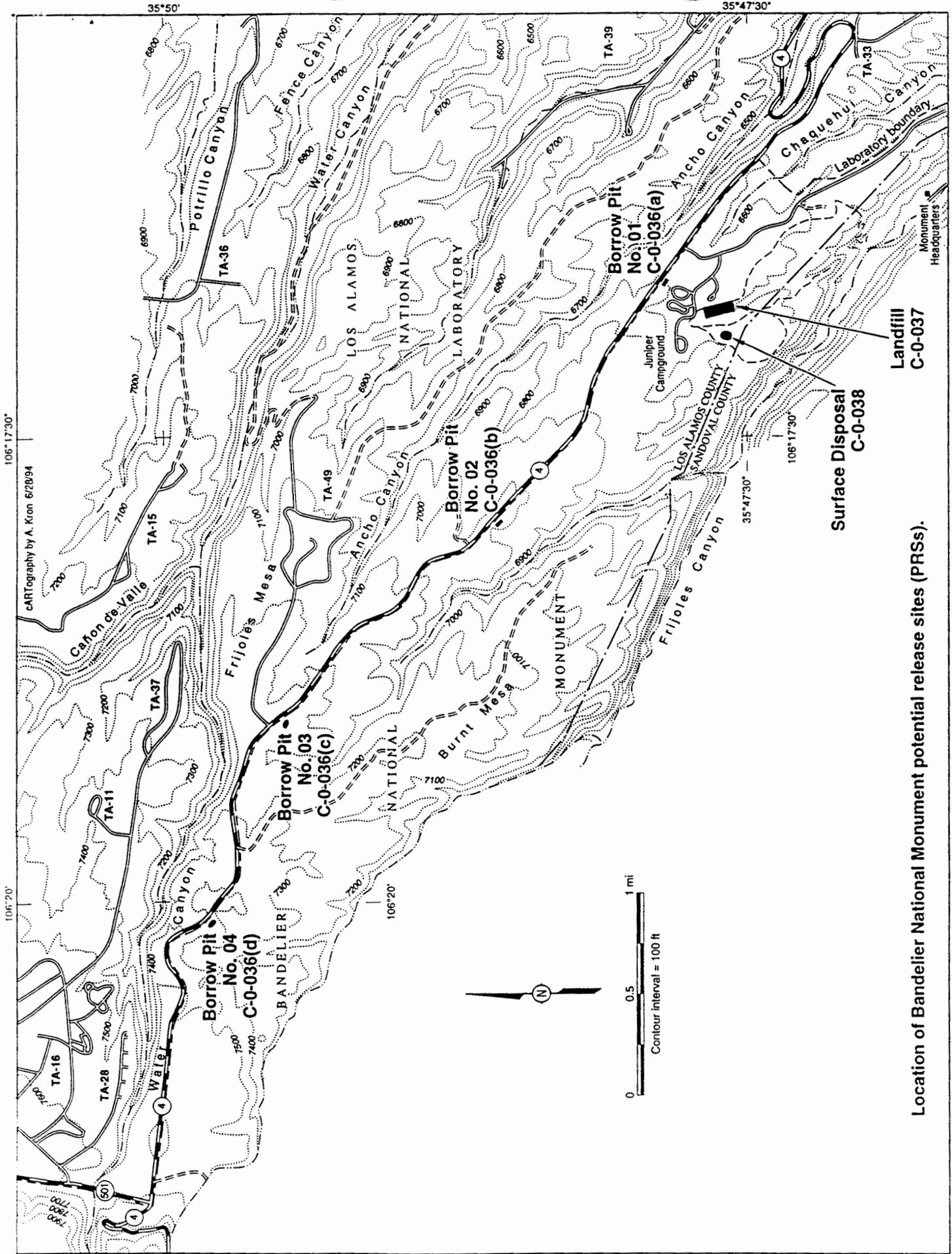
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C-0-037 -- BNM Landfill

Aerial photographs taken in 1958, about one year before the transfer of land on which this site is located, show that the southern end of current day landfill area was in the use at that time. However, the widest and best traveled road into the site has a major bend in it that takes the road southward into Frijoles Canyon, the location of the park headquarters and other buildings in the monument. Thus, the aerial photographs show that the dominant traffic flow was between the landfill and the monument, not the Laboratory to the north. The primary source of landfill material, if not the sole source, was the Frijoles Canyon area, i.e., Bandelier National Monument, even prior to the land transfer in late 1959. Interviews with buildings and grounds personnel at the monument document that the site was used as a landfill by Bandelier until recently. Given that only about 1/3 of the present-day landfill had been deposited by 1959, the majority of the fill material was placed there by Park personnel. Nothing found at the site or in the archival investigations indicates use by the Los Alamos Scientific Laboratory. The majority of the exposed debris at the site is construction material. Thus, the available information would strongly indicate that little if any of the debris at the site came from Laboratory operations and certainly none of the debris at or near the surface of the landfill. An AOC designation for this site is consistent with the known history.

C-0-038 -- BNM Surface Disposal

The surface disposal lies in a small excavation into a gentle slope of poorly welded Bandelier Tuff that has been filled with cobble and boulder-sized blocks of more densely welded tuff. The tuff blocks form 3 large "steps" that are some 10 feet in width with 5-ft. risers. A top of a 1930's vintage automobile is exposed in the upper "step." The only other man-made object found at the site is a piece of old china. The age and nature of these objects coupled with the unique cover of neatly laid down blocks of Bandelier Tuff indicate pre-Laboratory use of the site by the Civilian Conservation Corps (CCC). In the 1930s, the CCC used Bandelier Tuff, quarried immediately north of landfill C-0-037, to construct buildings and other structures in the monument. This surface disposal is considered to be a site where they buried unwanted materials/objects. The neat rock work of the "cover" has the appearance of CCC-type work. Nothing found at the site or in the archival investigations indicates use by the Los Alamos Scientific Laboratory. Thus, the AOC designation for the site is appropriate and consistent with what is known about it.



Location of Bandelier National Monument potential release sites (PRSS).