

John



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

AUG 13 1997

Mr. Benito Garcia, Chief
Hazardous and Radioactive
Materials Bureau
New Mexico Environment Department
2044A Galisteo Street
Santa Fe, NM 87505

Re: NOD Comments on the Voluntary Corrective Action (VCA) Plan
for PRS C-0-043, Los Alamos National Laboratory (LANL), EPA
I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed
LANL's VCA Plan for PRS C-0-043, dated December 19, 1996, and has
found the Plan to be deficient. Enclosed are the deficiencies
for your review.

Should you have any questions, please feel free to contact
Mr. Rich Mayer at (214) 665-7442.

Sincerely,

for *Rich Mayer*
David W. Neleigh, Chief
New Mexico and Federal
Facilities Section

Enclosure



0/11/1997

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NOD Comments on the Voluntary Corrective Action Plan for PRS C-0-043

General Comment: Under normal circumstances, a manhole is a vertical pipe/conduit located at the surface that connects to a horizontal sewer pipe which is located several feet below the surface. If this is not the case, please clarify.

Also, EPA does not fully understand the significance or past environmental problems associated with this PRS. EPA speculates that either: the manhole overflowed occasionally to the surface due to the sewer being clogged; or, that waste was put directly into the manhole, with some of the waste being spilled onto surface soils at time; or none of the above. Please clarify in the revised Plan.

Page 1; Operational History: LANL mentions that waste passed through the manhole from the original town site buildings. Was waste put directly into or down the manhole which was connected to the sewer; or did the waste pass under the manhole through the sewer lines/pipes? EPA assumes the latter. Please clarify.

In addition, has LANL removed the sewer lines that the manhole was connected to?

Page 4; Site Characterization: LANL mentions that samples were taken from the bottom of the manhole. Are the sewer pipes still connected to the manhole? Please clarify.

Note to NMED

From the information submitted, it appears that this PRS may not be a SWMU. Especially, if the following conditions are met:

1. The manhole connects or was connected to a sewer pipe;
2. The manhole did not periodically overflow to the surface from the sewer; and,
3. Waste was not put directly into the manhole.

However, not understanding the site and its history, EPA reviewed the Plan under the assumption that the PRS was a SWMU.

Also, the sewer line that the manhole was connected to may be a SWMU in the HSWA permit.