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State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
**DOE OVERSIGHT BUREAU**  
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MARK E. WEIDLER  
SECRETARY

74-01,73

January 6, 1998

Mat Johansen, DOE AIP POC  
U. S. Department of Energy  
Los Alamos Area Office, MS A316

Los Alamos, NM 87544

**Re: Comments on NFA Report for PRSs 0-034(a), 0-034(b),  
73-001(b), 73-004(c), and 73-004(d) in OU 1071 (Sept. 1997)**

Dear Mr. Johansen:

The DOE Oversight Bureau (DOE OB) has reviewed the subject document. The attached comments are provided for the purpose of communicating the results of the review. They are not provided or intended for the purpose of representing the regulatory position of the New Mexico Environment Department.

Our main comment is that the report proposes the five sites for No Further Action based primarily on incomplete and/or poorly documented site history. If you have any questions, please contact me at 505-672-0448 or Julie Wanslow at 827-1536.

Sincerely,

*Stephen Janicak*

Steve Janicak, LANL POC  
Department of Energy Oversight Bureau

SY:jw

Attachment

cc w/o attachment: John Parker, NMED, Chief, DOE OB

cc w/attachment: Benito Garcia, NMED, Chief, HRMB  
Joe Vozella, DOE LAAO, MS A316  
Ted Taylor, DOE LAAO, MS A316  
Julie Canepa, LANL, EM/ER, MS M992  
Dave McInroy, LANL, EM/ER, MS M992  
Brad Martin, LANL, EM/ER, MS M992  
Bonnie Koch, DOE LAAO, MS A316  
Roy Michelotti, LANL, MS E525  
Carl Newton, LANL, MS E525  
David Neleigh, US EPA Region VI, 6PO-N  
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**New Mexico Environment Department  
DOE Oversight Bureau Comments on the  
NFA Report for Potential Release Sites (September 1997):  
0-034(a), 0-034(b), 73-001(b),  
73-004(c), and 73-004(d) in OU 1071**

**General Comment:**

For two of the PRSs, site history was used to substantiate that a site investigation was not necessary: PRS 0-034(a), Nambe Place Trench, and PRS 0-034(b), Western Area Pit. For the other three PRSs, site history was used to help substantiate that the site investigations conducted at these sites were complete. However, the site histories were neither sufficient nor convincing. A description of complete site history is critical for determining whether a site is eligible for "no further action".

DOE OB recommends that the report provide sufficient and convincing site history for each PRS. DOE OB recommends that the "Historical Operations" sections explicitly state whether or not RCRA solid or hazardous wastes/constituents, CERCLA hazardous substances, or radioactive materials/wastes were ever managed or disposed of within the PRSs during the time period that the PRSs were being used. DOE OB recommends that this statement be supported by documented records searches, engineering drawings (if any), interviews with persons having firsthand knowledge of the PRS operations, and any other supporting documentation. DOE OB recommends that in order for the site history to be considered complete, these documents be pertinent to the entire time period during which the PRSs could have received contamination. In addition, DOE OB recommends that the documents address all historical operations that were conducted at the site, as well as adjacent historical operations that could have affected the site. DOE OB recommends that these documents be referenced in the text and the documents themselves be provided as attachments to the NFA report.

**Specific Comments:**

A. PRS 0-034(a), Nambe Place Trench

1. Section 1.1, Page 2, Site Description

"A former site worker has identified the trench-like image appearing on the photograph as part of the Zia Company's operation for making concrete blocks and small batches of concrete (Francis 1996, 05-0261)."

The report does not indicate which concrete operations were conducted in the trench.

DOE OB recommends that the report clarify the kind of concrete operations and any other activities that were conducted in the trench. In addition, DOE OB recommends that the report identify the materials and chemicals that were handled in the trench.

## 2. Section 1.2, Page 2, Historical Operations

The aerial photos show a number of buildings adjacent to the trench-like image. It is unclear whether all these buildings are associated with the concrete plant or just some of them.

DOE OB recommends that the report include a statement in the text clarifying whether all these buildings are associated with the concrete plant or just some of them. In addition, DOE OB recommends that a circle be drawn around the concrete plant buildings on the photos.

## 3. Section 1.2, Page 2, Historical Operations

"An aerial photograph taken in October 1961 show that the PRS 0-034(a) site, which was used to generate construction materials, was replaced by a warehouse yard (Fig. 1.1-4)."

The report does not describe the warehouse yard operations, the types of materials that were stored, nor how they were stored.

DOE OB recommends that the report describe the warehouse yard operations that took place within the trench area. In addition, DOE OB recommends that the report identify the period of operation of the warehouse yard, describe the items that were stored or handled at the yard, and state how they were stored or handled.

## 4. Section 1.2, Page 2, Historical Operations

It is not clear if historical operations conducted adjacent to or in the vicinity of the trench could have caused contamination at the trench. In the aerial photograph (Figure 1.1-1), some buildings are pictured adjacent to the trench and other buildings are pictured across a roadway south of these adjacent buildings. In accordance with typical historical practice at LANL, these buildings located to the south of the trench could have had septic disposal systems that carried waste northward and discharged into or through the trench.

DOE OB recommends that the report indicate the locations (if any) of septic systems or waste disposal systems that may have served buildings located south of the trench. DOE OB recommends the report indicate whether any pipes discharged into or through the trench. If pipes discharged into or through the trench, DOE OB recommends that the report provide a description of the types of wastes that were handled by the pipes and buildings, the location and type of pipes that conveyed the waste, and the location of any outfalls.

5. Section 1.3, Page 2, Site Investigations

"No field investigations were conducted at PRS 0-034(a) because the site was used only for the production of cement/concrete materials, and no RCRA solid or hazardous waste or constituents or other Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) hazardous substances were managed at the site."

DOE OB recommends that the report provide a reference and documentation for this site history statement. See General Comment.

B. PRS 0-034(b), Western Area Pit

1. Section 2.1, Page 7, Site Description

DOE OB recommends that the report provide the period of operation for this pit.

2. Section 2.3, Page 7, Site Investigations

"No field investigations were conducted at PRS 0-034(b) because the site was used only for storing and borrowing earth materials used for fill in the development of a housing area. No RCRA solid or hazardous wastes or constituents or other CERCLA hazardous substances were managed at the site."

DOE OB recommends that the report provide a reference and documentation for these site history statements. See General Comment.

DOE/OB Comments on NFA Report  
for PRSs 0-034(a), 0-034(b),  
73-001(b), 73-004(c), 73-004(d)  
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C. PRS 73-001(b), Waste Oil Pit

1. Section 3.2, Page 10, Historical Operations

See General Comment.

D. PRS 73-004(c), Former Airport Terminal Septic System

1. Section 4.2, Page 14, Historical Operations

See General Comment.

E. PRS 73-004(d), Landfill Office Septic System

1. Section 5.2, Page 17, Historical Operations

See General Comment.

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