



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
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NOV 03 1999



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

Re: Comments on the RFI Report for SWMU 0-017, Underground Waste Lines, LA-UR-99-3354, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Bearzi:

The Environmental Protection Agency (EPA) has reviewed LANL's RFI Report for SWMU 0-017, dated July 1999, and has found the Report to be partially approvable. EPA's comments and recommendations are enclosed for your review.

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

Sincerely,


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

Enclosure



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HSWA LANL 0/1671/0 00-017

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Comments and Recommendations on LANL's RFI Report for SWMU 0-017

This RFI Report includes the following SWMU: 0-017, a former industrial waste line system. It transported process chemical and radiochemical wastes that had been generated at TA-3, TA-43, and TA-48 to the former waste-water treatment plant at TA-45. The waste line ran from the South side of Los Alamos Canyon to the North side of the Canyon up to the Mesa Top, where the waste line paralleled Diamond Drive to Trinity Drive, where it was connected by a branch line from TA-3. Parts of the line on the mesa top lie underneath buildings and were not sampled.

PRS	LANL'S PROPOSED ACTION	DOES AA CONCUR?	AA RATIONALE
0-017	NFA	Partially	See recommendations

Comments and Recommendations

- General Comment:** Parts of the SWMU which are located under buildings were not sampled. Until LANL samples those areas, a no further action (NFA) decision should not be given for the whole SWMU, unless LANL wants to subdivide 0-017 into additional SWMUs. Also, there was no sampling from parts of the line that were removed in the 1960's. EPA agrees with a NFA decision for parts of the SWMU that was sampled. NMED may want to require a notice in the deed of the property for the portions of the line that remain intact, since the line could contain some sludges/wastes that some construction worker could contact in the future. Deed notice would also be helpful to new property owners.
- General Comment:** EPA does not believe that the surface soil contamination (lead) found in the Canyon under the Bridge is a SWMU unless DOE had responsibility for maintaining the bridge. Was the County, State or DOE responsible for painting and maintaining the Bridge? If DOE was responsible for the bridge, then they should be responsible for the cleanup. If DOE was not responsible, then it will be very difficult to force DOE to cleanup the contaminated surface soil, since it does not correspond to a release from a SWMU at LANL.
- General Comment:** The report mentions that there are no receptors for the buried waste line. EPA disagrees. There is a potential for worker exposure in removing the line and in building basements.