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State of New Mexico
ENVIRONMENT DEPARTMENT

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December 12, 2000

Ms. Ann Wadstrom, MD, President
Los Alamos Retirement Community Inc.
1011 Sombrillo Court
Los Alamos, New Mexico 87544

Mr. Lawry Mann, Chair
Los Alamos County Council
2300 Trinity Drive
Los Alamos, New Mexico 87544

RE: EVALUATION OF VOLUNTARY CORRECTIVE ACTION RESULTS AT
SWMU 0-019 (FORMER WASTE WATER TREATMENT PLANT)

Dear Dr. Wadstrom and Mr. Mann:

The New Mexico Environment Department's (NMED) Hazardous Waste Bureau (HWB) has received your request to review Los Alamos National Laboratory's (LANL) voluntary corrective action activities at Solid Waste Management Unit (SWMU) 0-019, submitted by letter from you to Mr. John Young and dated September 22, 2000. SWMU 0-019 is located at the former Central Waste Water Treatment Plant, in the eastern part of the Los Alamos townsite between the Sombrillo Nursing Facility and East Park. The land is currently owned by Los Alamos County. SWMU 0-019 is currently on the SWMU list of the Hazardous and Solid Waste Amendments module of LANL's operating permit. As such, it is required to be investigated and remediated by LANL under their Resource Conservation and Recovery Act Permit. LANL is preparing a final report summarizing the results of their investigation and corrective action. However, in order to enable the HWB to more quickly respond to your request, LANL has submitted the analytical data collected by LANL on the mesa top at SWMU 0-019 and a draft excerpt from the report for HWB review.

Based on a review of the information submitted by LANL, the HWB has no objections to your proceeding with construction of the assisted living facility at the location specified in your

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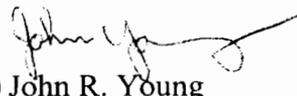
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September 22, 2000 request letter. However, HWB has a few concerns of which you need to be aware.

- One purpose of LANL's voluntary corrective action was to remediate SWMU 0-019 to be safe for residential use. The HWB believes that there is no potential exposure that could occur to residents at the facility. However, any construction activities may encounter the residual subsurface contamination at the site. Lead is present in the tuff at 1800 parts per million (ppm) at 13-14 feet in one location. According to the figure provided to HWB by LANL, the south wing of the facility will be located directly above this location. This level is above the NMED soil screening level for industrial workers of 1000 ppm. Excavation depths shall not be greater than 13 feet below present grade at the south wing of the facility.
- SWMU 0-019 is currently located on a mesa top and slope with two major drainages leading to Graduation Canyon. Over the years, Los Alamos County has deposited concrete and other debris into the drainages. Since the data collected in these drainages have not been evaluated by HWB as part of your request, we have not determined whether or not further investigation in these areas is needed. The HWB is concerned that additional debris may impede the progress of any potential remediation of the drainages. Construction debris shall not be disposed of in these drainages. In addition, storm water runoff from construction activities and from the facility parking lot shall be prevented from entering the drainages, moving potentially contaminated sediment further down the canyon.

HWB will make a final decision regarding SWMU 0-019 when the final report is received. A final decision cannot be made until the final data and the risk assessment have been reviewed. If you have any questions or require additional information please contact Darlene Goering of the DOE Oversight Bureau at (505) 827-1536, or me at (505) 827-1558 extension 1036.

Sincerely,



John R. Young
LANL Corrective Action Project Leader
Permits Management Program

JRY:dxg

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cc: J. Bearzi, NMED HWB
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