

etc

1936
TA-O



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2044 A Galisteo, P.O. Box 26110
Santa Fe, New Mexico 87502-6110
Telephone (505) 827-1557
Fax (505) 827-1544
www.nmenv.state.nm.us



PETER MAGGIORE
SECRETARY

PAUL R. RITZMA
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

May 2, 2001

Dr. John C. Browne, Director
Los Alamos National Laboratory
P.O. Box 1663, Mail Stop A100
Los Alamos, New Mexico 87545

Mr. Theodore Taylor, Project Manager
Los Alamos Area Office Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, New Mexico 87544

**RE: RESPONSE TO TEMPORARY USE OF DP LAND SUBPARCEL BY LOS
ALAMOS COUNTY
LOS ALAMOS NATIONAL LABORATORY
EPA ID NO. NM0890010515**

Dear Dr. Browne and Mr. Taylor:

The New Mexico Environment Department's (NMED) Hazardous Waste Bureau (HWB) is in receipt of your letter providing information on the temporary use of the DP land subparcel by Los Alamos County, dated February 5, 2001 and referenced by ER2001-0093. The letter provides information to be used in the decision to allow the county expedited access to the subparcel for temporary materials laydown during the rebuilding of Los Alamos in the wake of the Cerro Grande Fire. The subparcel is a portion of the DP Road parcel that is slated for land conveyance from the Department of Energy (DOE) to the county in the future. The subparcel contains Solid Waste Management Unit (SWMU) 0-030(b), which is currently on Los Alamos National Laboratory's (LANL's) hazardous waste operating permit. The HWB has reviewed your letter and believes that the county should not be allowed use of this subparcel at this time.



7534

Dr. John C. Browne and Mr. Theodore Taylor
May 2, 2001
Page 2

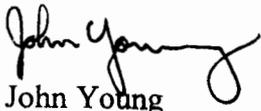
Laboratory's (LANL's) hazardous waste operating permit. The HWB has reviewed your letter and believes that the county should not be allowed use of this subparcel at this time.

A RCRA Facility Investigation report, which includes 0-030(b), was submitted to the HWB in May 1996 (referenced by LA-UR-96-1749 and EM/ER:96-312). The report was subsequently rejected, in part, due to the lack of contaminant delineation below the base of the leachfield. The HWB believes that the section of the subparcel that contains the former leachfield needs further characterization and should not be used until all necessary corrective action activities are complete. The HWB also believes that surface and/or subsurface contamination may exist outside of the former leachfield boundary, due to past LANL operations, excavation, or grading activities. Therefore, the remaining areas north, east, and south of the former leachfield should not be used and should be kept available for surface and subsurface characterization by LANL. These restrictions should remain in place until all investigations and/or any necessary remedial activities are complete, the final report is approved, and the site has been removed from the permit.

The other possible laydown site that the HWB has concerns with is the White Rock parcel. Although there are no SWMUs on this land, contaminated sediments have been transported down Cañada del Buey onto the parcel from multiple SWMUs within the watershed. This contamination has been the subject of investigation by both the Environmental Restoration Project and the Environmental Surveillance group at LANL. In 1999, samples collected by the Environmental Surveillance group from the sampling location at State Road (SR) 4 and Cañada del Buey showed levels of radionuclides exceeding their respective baseline fallout values. If the county were to use this parcel for material laydown, the HWB requests LANL to restrict use of land in and near the channel at SR 4. LANL should also ensure, in the special use permit, that no hazardous liquids or materials are placed in or near the channel. In addition, the special use permit should include a provision for oversight of any soil removal and regrading needed by the county at this and any of the remaining parcels.

If you have any questions or require additional information please contact me at (505) 827-1557, extension 1036.

Sincerely,



John Young
LANL Corrective Action Project Leader
Permits Management Program

Dr. John C. Browne and Mr. Theodore Taylor
May 2, 2001
Page 3

JRY:dxg

cc: J. Bearzi, NMED HWB
J. Kieling, NMED HWB
J. Young, NMED HWB
P. Allen, NMED HWB
J. Parker, NMED DOE OB
S. Yanicak, NMED DOE OB, MS-J993
J. Davis, NMED SWQB
~~D. Neleigh~~, EPA 6PD-N
J. Vozella, DOE LAAO, MS-A316
J. Canepa, LANL E/ER, MS-M992
M. Kirsch, LANL EM/ER, MS-M992
D. McInroy, LANL E/ER, MS-M992
File: Reading and HSWA LANL, 1/1071/00-030(b)