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PETER MAGGIORE
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MEMORANDUM

TO: Gedi Cebas

THROUGH: John Kieling, Permits Management Program *JK*

FROM: *ZW* Lee Winn and *JK* John Young, LANL Project Team

DATE: October 31, 2001

RE: **HAZARDOUS WASTE BUREAU COMMENTS REGARDING THE PROPOSALS FOR REPAIR AND REPLACEMENT OF PUEBLO CANYON SEWER PIPELINE AND LOS ALAMOS AND RECONSTRUCTION OF NORTH ROAD**

Sewer Pipeline Repair and Replacement Comments:

Pueblo Canyon is identified on the Los Alamos National Laboratory Resource Conservation and Recovery Act Hazardous and Solid Waste Amendments Permit as an area of concern, C-00-005. The Pueblo Canyon watershed has received historic effluent discharges and other contaminated debris from various locations, but most notably, former Technical Area 45. Past discharges from former TA-45 outfalls potentially contributed a variety of chemicals and radionuclides to the sediments in Pueblo Canyon. Contaminants identified in Pueblo Canyon include but are not limited to the following: PCBs, mercury, lead, isotopic uranium, isotopic plutonium, strontium-90 and cesium-137.

1. As sewage may contain a variety of household and industrial wastes, Los Alamos County, Los Alamos National Laboratory (LANL) and/or the Department of Energy (DOE) should characterize the canyon reach that was impacted by releases from the rupture of the sewer line.
2. Any contamination added to the reach from the sewage release should be investigated utilizing the Canyons investigation approach currently being implemented by Los Alamos National Laboratory. This is to document contributions to the Pueblo Canyon contaminant inventory that are not related to current and historic LANL/DOE waste management practices.



7578

Mr. Gedi Cebas
October 31, 2001
Page 2 of 2

3. Potential worker exposure to contaminated sediments resulting from historic effluent discharges and from the latest breach in the sewer line should be evaluated prior to repair and reconstruction activities. Proper personal protective equipment for workers should be selected based on the results of the risk assessment.
4. The old pipeline should be removed rather than abandoned in place. Any soil and old pipeline removed requires proper characterization before disposal can occur as they may have the potential to be hazardous or mixed waste.
5. Best management practices (BMP's) should be required to prevent possible erosion of contaminated sediments and other material.
6. The Los Alamos National Laboratory Environmental Restoration Program should be contacted so that areas of known or suspected sediment contamination found in Pueblo Canyon as well as locations/boundaries of any Solid Waste Management Units (SWMUs) may be located and avoided during repair and replacement of the Pueblo Canyon Sewer Pipeline.
7. Areas of canyons with known or suspected contaminated sediments that are disturbed by repair and reconstruction activities should be well documented as this may impact Hazardous Waste Bureau risk decisions and storm water monitoring requirements.

North Road Reconstruction Comments:

1. None at this time.