

# interoffice

MEMORANDUM

---

**to:** Barbara Hoditschek  
Surface Water Quality Bureau

**thru:** John Kieling, LANL Facility Manager *JK*  
RCRA Permits Management Program

**from:** Kim T. Hill, Environmental Engineer *KTH*

**subject:** Technical Area 15  
15-Day Corrective Action Report

**date:** January 2, 1997

The Hazardous and Radioactive Materials Bureau (HRMB) has received and reviewed the 15-day Corrective Action Report for the TA-15 Connector Road Project. The Connector Road Project entailed the removal of soil from one or more soil piles located at the TA-36 Ridge Road Y and south of Building 285 at TA-15.

The soil pile at TA-15 has been identified as an Area of Concern (AOC), C-15-002, and is located near Firing Sites A and B [15-004(b) and 15-004(c), respectively]. In a Notice of Deficiency, the Environmental Protection Agency did agree that C-15-002 should not be added to the HSWA Module of the RCRA Operating Permit.

The TA-36 soil pile is located within the "fragment hazard area" of Firing Site IJ and near two uncharacterized Potential Release Sites (PRSs), 15-006(e) and 15-008(f). LANL has not provided sufficient information to ensure that the TA-36 soils used in the TA-15 Connector Road Project have not been adversely impacted by nearby PRSs.

In conclusion, HRMB is concerned that potentially contaminated soils or inadequately characterized soils are being used as "clean fill" in projects such as the TA-15 Connector Road Project. In the future, HRMB requests that LANL provide prior notification of the disturbance of any RCRA-regulated unit to avoid any such future issues.

**cc:** 2-LANL-1086-15

C:\SITES\LANL\TA\_15\BH010296.MEM 1/2/97



3931

*14*