

**MEMORANDUM**

**TO: Gedi Cibas, Water & Waste Management Division**

**FROM: Teri Davis, LANL Facility Manager, HRMB**

**THROUGH: Benito Garcia, Chief, HRMB  
Robert Dinwiddie, Program Manager, HRMB**

**DATE: November 27, 1996**

**SUBJECT: Environmental Assessment Review of Transfer of the DP Road Tract to the County of Los Alamos dated November 15, 1996 - NMED FILE No. 1043ER**

*[Handwritten signature and initials]*

FILE HSWA LANL TP-21

**Affected NMED Laws and Regulations**

The Hazardous and Radioactive Materials Bureau is responsible for enforcing and ensuring compliance with the Resource and Conservation Recovery Act (RCRA) within the State of New Mexico. The Department of Energy (DOE)/ Los Alamos National Laboratory (LANL) is currently implementing Corrective Action through the Environmental Restoration (ER) program as required by RCRA Sections 3004 (u) and (v), 40 Code of Federal Regulations Parts 260 - 280, and by the New Mexico Hazardous Waste Management Regulations found in Title 20, Chapter 4. The proposed land transfer could possibly impact current RCRA investigations and potential remedial actions at the following Potential Release Sites (PRS): PRS 0-010(a), PRS 0-030(b), and PRS 21-015.

**Specific Impacts**

PRS 0-010(a) is a suspected surface disposal area which is an Area of Concern (AOC) not listed on the HSWA permit and has been proposed for No Further Action (NFA) in a Request for Permit Modification dated March 1995. NMED has reviewed the information presented for NFA justification and does not agree that information exists to determine if NFA can be justified or if the site should be added to the HSWA permit. Stockpiles of 10 foot long objects are seen in 1946 photographs by which DOE/LANL concludes, "the objects in the photographs are rows of supplies stored in containers that are considerably larger than 55 gallon drums and because these containers have no characteristics that indicate that they are associated with potentially hazardous materials, it is recommended that no further action be taken". HRMB is concerned that characteristics are being determined for unknown objects and decisions regarding NFA are being made from such information. Also, given the close proximity to PRS 21-015 (MDA-B) from PRS 0-010(a) and the history of disposal practices at LANL during the this period lend to suspect the nature of the stockpile. HRMB intends to issue a Notice of Determination (NODT) on the March 1995 Request for Permit Modification to DOE/ LANL which would convey this information.

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PRS-0-030(b) is a septic system/leach field and a SWMU which is on the HSWA permit. This site was initially investigated July 26, 1995 during which antimony, copper, lead, mercury, silver, zinc, plutonium-238 & 239, and Aroclor (1260) were found at levels which indicate a potential for adverse human health effects (LANL RFI Report, May 1996). A Voluntary Corrective Action (VCA) has been conducted, however; the results of the clean-up and verification sampling have not been submitted to HRMB for review. Thus HRMB can not determine if additional work is needed at this SWMU to met the requirements of RCRA for Corrective Action.

Additionally, of concern to HRMB is a high priority PRS (21-015), Material Disposal Area (MDA)-B, which is immediately adjacent to the proposed land transfer area. Existing information indicates releases of radioactive contaminants to both surface and subsurface soils from MDA-B (LANL RFI Workplan, May 1991). It is currently unknown what the extent of contamination may be and if the DP Road Tract is affected from any releases associated with MDA-B. Due to DOE budget constraints, characterization of MDA-B is not scheduled to be completed until April 1999. Also, as projections of the Guaje Mountain Fault zone extend directly through the proposed DP tract land transfer area near MDA B, an enhanced likelihood of subsurface migration of contaminants from MDA-B may exist (LANL RFI Workplan, May 1991).

*Final*

FILE LANLHSPA 7A-81

*Environmental Assessment  
for the  
Transfer of the DP Road Tract  
to the County of Los Alamos*

Los Alamos, New Mexico

**Predecisional Draft**

Date Prepared: November 15, 1996  
Prepared by: US Department of Energy  
Los Alamos Area Office

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