

# Los Alamos

NATIONAL LABORATORY

## memorandum

Earth and Environmental Science Division  
EES-15, Environmental Science Group  
Los Alamos, New Mexico 87545

To/MS: Memo to the File

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Symbol: EES15: ER-97-077

Date: October 30, 1997

TA-39  
39-010

### SUBJECT: CONVERSATIONS WITH NMED-AIP ON REGULATORY STATUS OF EXCAVATED SOIL DUMP

During early October Cathy Goetz asked if there were any regulatory drivers or correspondence from NMED driving an urgent assessment or actions regarding the excavated soil dump at TA-39. I indicated that I knew of none and determined that the Field Unit 2 hierarchy also knew of none. I then contacted Brian Vigil (AIP) who queried several of his contacts and determined that no drivers for urgent activities at the soil dump were known. He stated, however that water-erosion issues should be discussed with Ralph Ford-Schmid. I was later able to discuss the subject with Ralph who stated that the New Mexico regulations do provide some information relative to dumping in watercourses. Since 20 NMAC 6.2 Section 2200 (Water Course Protection) does cover disposing contaminants directly into watercourses there may be a driver there for action on the soil dump. He recommended, however, that LANL complete an AP 4.5 evaluation to determine the level of impact to the local watercourse that the soil dump may cause. He also felt that, since the site operators currently engineer stream channel diversion around the dump, any action would probably be of low priority compared to other problem areas at LANL.

I contacted Steve Veenis to relay Ralph's thoughts and Steve indicated that an AP 4.5 would be prepared for the excavated soil dump.

EHE/nr

Cy: **Ralph Ford-Schmid, NMED**  
Brian Vigil, AIP, MS J993  
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TA-39 Project Files  
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*TA-39 / from EHE / Best of DDD*