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CERTIFIED MAIL
RETURN RECEIPT REQUESTED



August 11, 1998

Mr. Theodore Taylor, Program Manager
Los Alamos Area Office
Department of Energy
528 35th Street, MS A100
Los Alamos, New Mexico 87544

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

**RE: Request for Supplemental Information
For the Stabilization Plan (SP) for Implementing Interim Measures and Best
Management Practices at PRS's 49-001 (b, c, d, and g)
Los Alamos National Laboratory (LANL) EPA I.D. NM0890010515**

Dear Mr. Taylor and Dr. Browne:

The RCRA Permits Management Program (RPMP) of the Hazardous and Radioactive Materials Bureau (HRMB) has reviewed DOE/LANL's July 14, 1998 (EM/ER:98-227) Stabilization Plan (SP) for Implementing Interim Measures and Best Management Practices at PRS's 49-001 (b, c, d, and g) and found it to be incomplete. A request for supplemental information is included as Attachments A and B. Attachment A reflects comments of the HRMB and Attachment B provides comments of the Surface Water Quality Bureau.

These comments do not require any major revisions to the proposed interim measure. DOE/LANL must respond to the request for supplemental information items listed in the Attachments within thirty (30) calendar days of receipt of this letter. If DOE/LANL does not submit a complete response within thirty (30) calendar days a Notice of Deficiency will then be issued.



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Should you have any questions regarding this matter, please contact me or Mr. John Kieling, RPMP's LANL Facility Manager, at (505) 827-1558.

Sincerely,

Stephanie Kruse

for Robert S. (Stu) Dinwiddie, Ph.D., Manager
RCRA Permits Management Program
Hazardous & Radioactive Materials Bureau

RSD:rw

cc w/attachments:

J. Canepa, LANL EM/ER, MS M992
J. Davis, NMED SWQB
B. Garcia NMED HRMB
M. Johansen, DOE LAAO, MS A316
J. Kieling, NMED HRMB
M. Kirsch, LANL EM/ER, MS M992
S. Kruse, NMED HRMB
M. Leavitt, NMED GWQB
H. LeDoux, DOE LAAO, MS A316
D. McNroy, LANL EM/ER, MS M992
D. Neleigh, EPA, 6PD-N
J. Parker, NMED DOE OB
J. Vozella, DOE LAAO, MS A316
L. Winn, NMED HRMB
S. Yanicak, NMED DOE OB, MS J993
File: Reading and HSWA LANL 5/1144/49-001(a-g)[MDA AB]
Track: LANL, 8/11/98, NA, DOE/LANL, HRMB/Dinwiddie, RE, File

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ATTACHMENT A
Request for Supplemental Information
For the Stabilization Plan (SP) for Implementing Interim Measures and
Best Management Practices at PRS's 49-001 (b, c, d, and g)

GENERAL COMMENTS:

1. LANL shall submit an as built certification report verifying the work that was completed and what deviations from the approved plan were made.
2. LANL shall provide a sampling schedule for the moisture content beneath the temporary cover, including fill and clay, to determine if the cover is effective.
3. LANL shall provide a contingency plan (with schedule) that describes an alternate solution if an increase in moisture content under the temporary cover, including fill and clay, occurs.
4. Attachment 1, Evaluation of Potential Surface Water Concerns. AP 4.5 changes will be initiated by the Surface Water Quality Bureau and the Surface Water Assessment Team (SWAT).

Attachment B

Request for Supplemental Information from the Surface Water Quality Bureau For the Stabilization Plan (SP) for Implementing Interim Measures and Best Management Practices at PRS's 49-001 (b, c, d, and g)

The Storm Water Industrial General Permit Pollution Prevention Plan Checklist (EPA Form 3560-3 (Rev 9-94) was used as a review guidance. Sections from that guidance are bolded. One attachment is included.

A. POLLUTION PREVENTION TEAM

1. Specific individuals have been identified as members of the Pollution Prevention Team (PPT). Mr. Jeff Watersheid was present at a site tour, and represents ER Regulatory Compliance. Indicate the role he has in relation to the PPT. Other ER sites have BMP Managers assigned to them. Please indicate if there is a BMP manager for this site, and how he or she would interact with the PPT.

B. DESCRIPTION OF POTENTIAL POLLUTANT SOURCES

1. Indicate areas of run-on (e.g. Area 11), low spots which pond (e.g. Fig. 3.6 in the IM Plan, and low spots below the 49-003 leachfield, and rutted roads, etc.) in Appendix C Site Drainage Map.
2. Update the structural and non-structural control discussion to include newly added BMP's and/or proposed BMP's for run-on and ponding areas.
3. Expand the SWPP discussion of 49-003 to include run-on/run-off controls at this location.
4. The SWPP should contain information describing any storm water exposure to materials handled, treated, stored, or **disposed** of at 40-001 (b-d,g) and 40-003 which may have occurred in the last 3 years. The description should include the method and location of storage/disposal, description/location of existing structural and non-structural controls (e.g. the cap), and a description of all material management practices if applicable.
5. All existing storm water sampling data should be provided. Appendix D of the SWPP only indicated future storm water data was to be provided. Mention was made in the IM (Page 12) that an annual sediment sampling program was initiated at TA-49 at two stations (Stations A-2 and A-3) located near Area 2 (Fig. 3-2), and that data are available through various reports. Station A-2 was located in a channel that collected surface

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runoff. In addition, the SWPP refers to annual reports prepared by ESH-18. Information in these reports related to TA-49 should be presented in the SWPP.

6. The SWPP description of areas with high potential for significant soil erosion should also include impacts to 49-003.
7. The narrative discussing the potential pollutant sources cites the potential runoff (Page 2) value for this site as 0.5 acre ft. of storm water. Runoff rate is usually calculated in cubic feet per hours. Indicate how the 0.5 acre ft. value was determined.

C. DESCRIPTION OF APPROPRIATE MEASURES AND CONTROLS

1. The Good Housekeeping section of the SWPP indicates an on-site waste manager will perform weekly inspections to ensure proper use and disposal of materials on site and will train all site personnel on good housekeeping BMP's and the requirements of this SWPP plan. Indicate if this person is a member of the Pollution Prevention Team.
2. WQCC regulations require a timely spill report and follow-up reports. Pursuant to WQCC, there is no such thing as "reportable and/or non-reportable spills". All spills are to be reported using the 1203 Spill report forms. Therefore, the ESH-18 representative responsible for this reporting shall be notified as soon as possible of the spill so that he or she may file this report to the State in a timely manner. The report filed by the ESH-18 representative is a standard form requiring response to specific questions. Please include the form as part of the appendices so that personnel responsible for spill prevention/response procedures are familiar with the information that will need to be provided to the ESH-18 representative. A copy is enclosed for your convenience. In the past, spill events have happened at other sites, involving heavy equipment, etc., that were not reported in a timely manner. NMED-SWQB would encourage the pollution prevention team to insure that these reports are accurate and timely.
3. Documentation of effectiveness of BMP's could be shown by taking photos of sediment collected by the BMP's. It is recommended that these be included as part of the inspection sequence outlined in section 3.4 of the SWPP.
4. Indicate that the State (NMED-DOE/OB) will be notified and receive copies of changes made to the SWPP.
5. Section 4.1 indicates herbicides will be used for weed control. Storm water run-off with improperly applied herbicides could impact aquatic life in watercourses below the site. Proper and timely application is therefore required.

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6. Section 4.2 states, "site runoff will be periodically sampled and analyzed for constituents that may have migrated from the site or from up gradient PRS's as part of the Laboratory's NPDES general permit". Specific sampling times should be stated* and samples analyzed should represent the constituents of concern and also reflect requirements of the WQCC (e.g. filtered/ unfiltered samples).
 7. Section 2.3 (Non-storm water Discharges) states, "to dust control with Dust-Ban 8806M which could cause elevated concentration of magnesium in storm water runoff from areas where it is applied". Indicate magnesium will be analyzed for in storm water samples and/or that runoff control from these areas will be minimized. If water is to be used, a Notice of Intent should be filed with NMED.
 8. Section 2.3 also states, "sampling equipment will be decontaminated by washing with a nonhazardous detergent solution and discharged up to 6 gallons per day under the Laboratory notice of intent for decontamination water". Enclose as an attachment this notice of intent.
 9. Other Potential Sources of Exposure to Storm Water such as Laydown, Stockpile, Parking, Waste Storage Areas, and Heavy Equipment Use are discussed in the SWPP. Good Housekeeping discusses the preventative Maintenance Program which is a weekly inspection of heavy equipment, materials handling, decontamination, refueling, and parking to address leaks or spills. However, the SWPP does not fully address the stockpiled asphalt (may or may not be containerized). If not containerized the area should be bermed for run-off, and a schedule for removal of the asphalt established in the SWPP.
 10. Indicate the Report on Results of the Comprehensive Site Compliance Evaluation will be submitted to the NMED-HRMB.
 11. Section 5.3 states, in part, "structural features for the control of runoff and sediment, those changes must be implemented within 12 weeks after the modification is incorporated into the SWAPP plan". If implementation takes 3 months, interim measures should be applied to decrease runoff and sediment migration during the interval. This would be especially critical during those months that exhibit increased rainfall.
 12. Include with the Annual Site Compliance Evaluation Reports a "Certification of Compliance and/or a List of Incidents of Non Compliance".
- * NMED-SWQB is developing a policy paper on monitoring requirements to verify BMP's have stabilized the site with regard to surface water concerns. Contact Barbara Hoditschek of the NMED-SWQB at 827-0596 concerning the status of this policy.

RELEASE / DISCHARGE NOTIFICATION

LOS ALAMOS NATIONAL LABORATORY
Permit Number: NM0028355

Year
1998

NPDES or Operational Spill/Release (Indicate by X in appropriate box)
ER Spill/Release

Release ID Number:
[]

Responsible Facility/User Group: []

Contact Person: [] Pager #: []

Phone #: [] Cell Phone #: []

Release/Discharge Location: []

TA: []

Building: []

If the release/discharge is associated with a NPDES Outfall, Potential Release Site (PRS) or Solid Waste Management Unit (SWMU), indicate the site/unit number and its relationship to the release/discharge:

NPDES: PRS: SWMU: PRS/SWMU Number: []

(Indicate by X in appropriate box)

Relationship of the Discharge to a SWMU or PRS:

[]

Release / Discharge Occurred	[] Date and Time	Release / Discharge Discovered	[] Date and Time	Release / Discharge Stopped:	[] Date and Time
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Cleanup Started:	[] Date and Time	Cleanup Finished:	[] Date and Time
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Material(s) Released / Discharged:
[]

Release/Discharge Mitigation Method:
[]

Weather Conditions:
[]

Duration of Release/ Discharge, in HOURS:	[]	Est. Volume Released/ Discharged, in GAL	[]	Est. Volume Recovered, in GAL	[]
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Corrective Actions Taken (e. type of BMPs, etc):
[]

Nearest Watercourse (Canyon Name) []

If the release/discharge reached a watercourse, describe the estimated surface area affected, presence of release/discharge now in the watercourse, and the media the release/discharge was detected in:

[Empty text box for watercourse description]

Depth to Groundwater, in FT, if known: []

Distance to Nearest Drinking Water Well, in FT, if known: [] Well ID# []

CONTACT INFORMATION

Agency	Name	Phone	Fax	Date and Time
EPA:	E. Spencer	214-665-6475	214-665-6490	[]
NMED/SWQB:	B. Hoditscheck	827-0596	827-0160	[]
NMED/GWQB:	B. Swanson	505-841-9458	[]	[]
NMED/HRMB:	J. Kelling	827-1557	827-1544	[]
NMED/DOE-OB:	S. Yanicak	672-0448	672-0488	[]
ESH-18:	H. Decker	665-2014	665-9344	[]
DOE:	J. Plum	665-5024	665-4872	[]
OTHER:	D. Wolffe	667-3766	665-4424	[]
OTHER:	[]	[]	[]	[]

Comments: []

Form Completed By: H. Decker

7 DAY NOTICE

7 Day Notice 7 Day Notice Date: [] 7 Day Notice By: H. Decker

(X When Complete)
Comments: []

15 DAY FOLLOW-UP

15 day Follow-up Due: [] 15-day Follow-Up By: H. Decker

Comments: []

NMED 30 DAY RESPONSE

NMED 30 Day Response Date: []

Comments: []

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