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LANL TA-53

LANL / MISC

March 20 1996

Elizabeth R. Withers
NEPA Compliance Officer
Los Alamos Area Office
528 35th Street
MS-A316
Los Alamos, N.M. 87544

RECEIVED

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DOE OVERSIGHT BUREAU

Dear Ms. Withers:

RE: PREDECISIONAL DRAFT ENVIRONMENTAL ASSESSMENT FOR THE LOW ENERGY DEMONSTRATION ACCELERATOR, TECHNICAL AREA 53; DOE/EA 1147; LOS ALAMOS NATIONAL LABORATORY, LOS ALAMOS NEW MEXICO; OFFICE OF DEFENSE PROGRAMS, U.S. DEPARTMENT OF ENERGY; FEBRUARY 21, 1996

This provides New Mexico Environment Department (NMED) staff comments regarding the above-referenced Predecisional Draft Environmental Assessment (PDEA).

A. SURFACE WATER QUALITY

1. Executive Summary:

The PDEA's Executive Summary states "Sandia Canyon sediments have no known radionuclides, heavy metals, or organics above normal background levels that would move downstream." The document, however, provides no data to support this statement. There are known Solid Waste Management Units (SWMUs) and Potential Release Sites (PRSs) in Sandia Canyon. The PCB SWMU near TA-3, lead shot from the firing range, the old NPDES outfall 09S at TA-53 that discharged radioactive mixed waste into Sandia Canyon prior to the construction of a third pond, and others, all constitute factors for legitimate concern. Submittal of data from all known SWMUs and PRSs in Sandia Canyon to the Department's Surface Water Quality Bureau (SWQB) for review would be needed before determination of potential impacts from the proposal could be made.

2. Section 2.1.3. Waste Generation:

The environmental assessment should include a detailed description of the corrosion inhibitors. We also recommend that Best Management Practices (BMPs) be installed in the drainage



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channel before increased flow from the LEDA project begins, instead of waiting for a problem to occur.

3. Section 2.1.4.2. Construction:

As stated, it appears that more than (5) five acres of land are to be disturbed (see also pages 45 and 46); therefore, we recommended that an application be submitted under the National Pollution Discharge Elimination System (NPDES) for a Storm-water Construction Permit and Pollution Prevention Plan.

4. Section 3.2.4. Environmental Restoration:

Because of near proximity to the NPDES Outfall #03A113 discharge of a Solid Waste Management Area (SWMU) and a Potential Release Site (PRS), we recommend that an additional investigation be conducted at these sites before outfall flow is increased; this would help assure that no COCs are transported from the site due to surface flow. In addition, data from the SWMU and PRS site should be provided to NMED for determination of contaminate concentrations relative to applicable State regulations. (See also Section 4.1.4 in the PDEA and comment # 6, below.)

5. Section 3.2.7. Water; (Also, Section 4.1.7):

Known concentrations of PCBs, associated with SWMUs in upper Sandia Canyon, may have been deposited in the alluvium of Sandia Canyon near the 03A113 outfall junction. It is not known whether the absence of any PCBs in the alluvium of Sandia Canyon has been documented by sample results as of this date. Normal background concentrations of PCBs have yet to be established; any PCB transport to the Rio Grande would be of significant concern.

6. Section 4.1.7. Water:

According to Section 1105.A. of the New Mexico Water Quality Control Commission's *Standards for Interstate and Intrastate Streams*, "Designated uses of waters of the State will be limited to livestock watering and wildlife habitat only when effluent does not enter a classified water with criteria which are more restrictive than those necessary to protect livestock watering and wildlife habitat except in direct response to direct precipitation or runoff." If during any stage of this project the effluent saturates the alluvium and maintains flow to the Rio Grande, the designated uses of Section 2111 of *Standards for Interstate and Intrastate Streams* would need to be attained at the confluence of Sandia Canyon and the Rio Grande. These designated uses are: irrigation, livestock watering, wildlife habitat, marginal coldwater fishery, secondary contact, and warmwater fishery.

7. Appendix A. Dose and Human Health Risk Calculation Methodology:

The assignment of risk associated with operations and/or accident scenarios using the BEIR V assessment methodology, although appropriate for NEPA assessments, may underestimate the human health risk. The use of alternative risk assessments, which estimate risk of cancer incidence, rather than cancer fatality risk, may provide more meaningful results.

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8. General:

Mitigation measures for erosion control of disturbed areas, such as construction of additional water lines, parking areas, roads and buildings, should be addressed in the site-specific design plans. Information in the PDEA indicates that LANL and the U.S. Department of Energy are aware of the permits needed.

B. AIR QUALITY

1. Section 4.1.2. Air:

This section considers a worst-case scenario of the effects on air quality due to increased non-radioactive and radioactive emissions from the project. As shown in the analysis through the use of acceptable methodology, when compared to the state and federal ambient air quality standards, the projected impacts are quite small.

2. Section 5. Permits:

For air emissions, the U.S. Environmental Protection Agency (EPA) issues preconstruction approvals for radionuclide emissions per 40 CFR Part 61. NMED does not have authority for the subpart of this regulation which applies to LANL. It is recommended that LANL contact the EPA prior to the start of construction to clarify whether or not preconstruction approval is required. The discussion in this section is ambiguous on this point.

For non-radioactive emissions, NMED is the permitting agency. It is recommended that LANL contact NMED's Air Pollution Control Bureau for clarification on permit issues. The language in the current draft is either ambiguous or incorrect. Although the projected increase in solvent emissions is small, there is no de minimis level in the construction permit regulation (20 NMAC 2.72) for an emissions increase at an existing major source. The same point applies to the emissions increase from the cooling tower boilers. Although they may qualify as an insignificant activity under the operating permit regulation (20 NMAC 2.70), there is no corresponding exemption in the current construction permit regulation. Emission increases from gas consumption at the existing TA-3 Power Plant may be exempt from preconstruction review if no physical or operational change needs to be made to accommodate the increase in gas consumption. Again, it is recommended that NMED be contacted for clarification on these points in preparing the final assessment.

We appreciate the opportunity to comment on this document. Please let us know if you have any questions.

Sincerely,



Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

NMED File No.973ER