



State of New Mexico
ENVIRONMENT DEPARTMENT
DOE OVERSIGHT BUREAU
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 GOVERNOR

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March 24, 1998

Mat Johansen, DOE/AIP/POC
 Dept. of Energy
 Los Alamos Area Office
 MS: A316
 Los Alamos, NM 87544

Re: Observations resulting from Department of Energy Oversight Bureau (DOE OB) tour of TA-54, LANL Low-Level Solid Waste Management Area

Dear Mr. Johansen:

On March 18, 1998, a representative of the New Mexico Environment Department Department of Energy Oversight Bureau (DOE OB) accompanied ESH-18 during their TA-54 Storm Water Pollution Prevention Plan audit. This letter transmits observations noted by the DOE OB representative and provides recommendations regarding Best Management Practices (BMPs). A map is included which references each observation.

In general, activities which will result in the disturbance of surface soils at TA-54 should be assessed for their potential impacts to storm water runoff quality and BMPs should be installed prior to the start of those activities. BMPs require regular inspection and routine maintenance to ensure their effectiveness in reducing sediment transport. If you have any questions please contact Ralph Ford-Schmid at 827-1536.

Sincerely,

Stephen Yanicak

Steve Yanicak,
 Point of Contact/LANL,
 NMED, DOE OB

SY: rfs

cc: John Parker, Chief, NMED, DOE OB
 James Davis, Chief, NMED, SWQB
 Benito Garcia, Chief, NMED, HRMB
 Steve Rae, LANL, ESH-18, MS K490
 Bonnie Koch, DOE/LAAO, MS A316

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Notes on the March 18, 2008 ESH-18, TA-54 Storm Water Pollution Prevention Plan audit conducted by LANL ESH-18. The following are the observations, comments, and recommendations of the DOE OB representative. The numbers of each bullet correlate with numbered locations on the map provided.

Began site visit on West end of TA-54 Area G - Low-Level Solid Waste Management Area

1. Following the fence line along mesa top in southeast direction, paralleling Building 54-49, it was noted that the silt fence was in need of major repairs (e.g., gaps at bottom, fasteners to fence torn).
2. At SW corner, a rock sediment trap outside of fence is filled with sediment. This should be cleaned out and provided with additional sediment trapping capacity (e.g., silt fence down gradient). Hay bales and silt fence in corner are in good shape.
3. Following fence line to the east, there is a failure approximately half-way to corner, where sediment is escaping from silt fence.
4. At the corner, where fence line heads north, the silt fence needs cleaning out, the hay bales are rotted and need replacement.
5. Following fence line north, there is a section of silt fence that has been buried from regrading conducted above near bld 54-224.
6. The silt fence below cement and rock channel (draining Bldg. 54-224) is failed and runoff is bypassing the silt fence (located down gradient, in area detailed in next bullet) and getting offsite.
Erosion channels are evident below cement and rock runoff channels draining Bld. 54-224 area.
7. The temporary roadway that bulldozers are using to access the fill pile is eroding and needs reinforcement. The sediment from this roadway along with discharge from a culvert underlying the permanent roadway are collecting at the silt fence, located about 100 ft down gradient. This location would be ideal to install a sediment retention pond.
8. The fence along the fill pile, where boulders of tuff have collected, does not appear to be discharging sediment (the boulders are trapping sediment).
9. The fence around the bone yard has no BMPs, but does not appear to be a point source for sediment discharge or runoff.
10. The road that follows the fence along the High-Level tritium shafts, and the disposal trenches, are directing runoff toward the corner (where the escape trail to Pajarito Road exits). There is evidence of discharge at the corner and under the gate for the escape trail.
Continuing past the escape trail gate, the security fence has recently been upgraded. There are no BMPs in place and erosion is evident along the fence. This corner collects runoff from a large area of exposed soils, east of the TRU shafts. There is a pile of soil located in this area which is helping to slow runoff but may also contribute to the overall problems in this area.

11. Near Bldg. 54-28 (E, on road) there is a storm water culvert surrounded by a silt fence. The silt fence should be improved. This discharges to Canada del Buey.
12. Nearing the Transuranic Waste Inspectable Storage Project (TWISP) Bldg. 54-226, near a fire hydrant, regrading of the area has directed storm water to the fire hydrant area and has resulted in a large discharge of loose fill. The silt fence has been filled and appears to have over-topped. The area needs to be reenforced with gabion structures, similar to the structures around the four domes to the SE (54-232,231,230,& 229).
13. The corner near Bldg. 54-242 is collecting storm water runoff and sediment from the exposed Pad 4 area. Pad 4 has no BMPs in place and regrading of area has altered runoff patterns so that the retention pond installed at the NE corner is no longer effective. This should be evaluated considering the requirements of the TWISP, 1993, compliance order.

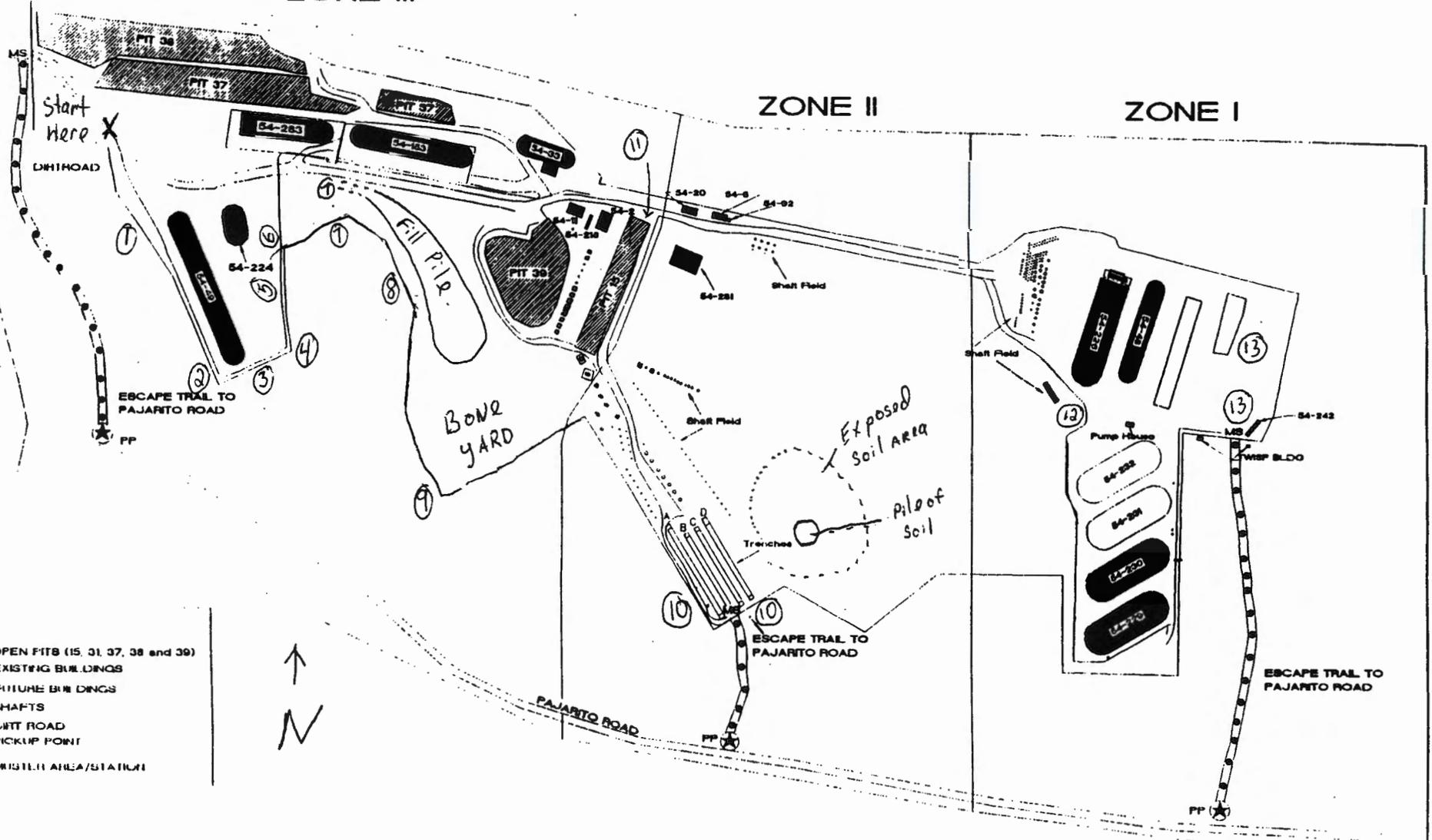
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TA-54 AREA G - LANL LOW-LEVEL SOLID WASTE MANAGEMENT AREA

ZONE III

ZONE II

ZONE I



- LEGEND
- OPEN PITS (15, 31, 37, 38 and 39)
 - EXISTING BUILDINGS
 - ▭ FUTURE BUILDINGS
 - SHAFTS
 - DRIVE ROAD
 - ☆ PICKUP POINT
 - MS WASTE AREA/STATION