

STU



Department of Energy
Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

JUN 02 1997

Dr. Ed Kelley, Director
Water and Waste Management Division
New Mexico Environment Department
1190 St. Francis Drive
P. O. Box 26110
Santa Fe, NM 87502

Dear Dr. Kelley:

Subject: Cooperation in Addressing Surface Water Issues

The Department of Energy (DOE) and the Los Alamos National Laboratory (LANL) are writing to respond to your letter dated April 28, 1997, which expressed concern for cooperation in response to requests made by the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) for data and activities related to Environmental Restoration (ER) sites located on or near watercourses. Please note that your letter was read with great concern. The issues you raised were reviewed at the highest levels of management associated with the ER Project. This response is prepared to outline initiatives that have been underway for some time to provide the cooperation you are seeking according to the existing tools within the ER Project. Tools are not currently available to respond to all requests made by NMED; therefore, this letter is provided also to describe clearly the limitations in the ER Project which have created delays or inabilities in addressing some of your requests. In retrospect, we recognize that had we made clearer attempts to explain the difficulties we face in responding to some NMED requests, you might have reached a different judgment as to the willingness of the ER Project to cooperate with your staff.

Two main initiatives are possible within the ER Project to address NMED/SWQB concerns for cooperation. The first initiative is to complete the use of Administrative Procedure (AP) 4.5, "Evaluation and Notification of Potential Surface Water and Ground Water Concerns at ER Sites," for the more than 684 Potential Release Sites (PRS) located on or near a watercourse in a time frame possible within the existing constraints of the ER Project. The installation of Best Management Practices (BMP) to control the migration of harmful constituents into watercourses, as soon as there is information to indicate the need, is the main goal in the use of the AP.

To support the discussion of this initiative, a data table containing the list of 684 sites is enclosed with this letter. The table highlights PRSs for which AP 4.5 has been used and also PRSs for which BMPs have been installed. A third group of sites on the table includes PRSs for which sampling has not yet been completed; RFI Report dates will be provided for this group of PRSs, as they become available, in monthly meetings.¹ It is the goal of the ER Project and the ESH

¹The ER Project is currently negotiating delivery dates with NMED/Hazardous and Radioactive Materials Bureau

HSQA CANL 6/11/97

TC



13031

JUN 6 2 1977

Dr. Ed Kelley

Division to have performed site walk-throughs for this third group of sites to determine if there are obvious requirements for BMPs by the end of the calendar year.

Beyond this expedited goal in the calendar events, however, it would be extremely difficult to expedite site characterization for this third set of sites without significantly restructuring the ER baseline. Although such restructuring is not an impossibility, the ER Project is not currently planning to initiate any changes to the baseline for several reasons. First, the current ER baseline is already designed to support an approach which is protective of the environment in that sites which are scored high through a Site Ranking System (SRS) generally are investigated ahead of lower priority sites. The SRS has served as the tool for negotiating baseline schedules with the RCRA Administrative Authority for a number of years. Second, the use of AP 4.5 in combination with the current baseline schedule adds further prioritizing to sites located on or near watercourses and should adequately serve to address water quality concerns through the installation of BMPs ahead of plans for site remediation. Third, significantly changing the ER baseline is an extreme resource-consuming process requiring coordination between regulators, DOE management, and a number of LANL entities, thus taking months to initiate and complete.² In fact, a significant restructure would take on the order of many months to even a year to execute. Therefore, we hope the use of AP 4.5 is an acceptable solution in responding to NMED/SWQB's requests to address sites on or near watercourses.

The second initiative consists of modifying RFI Reports to include a section that highlights data and analyses with regard to water quality concerns. The current goal is to make this section available in all future RFI Reports which are sent to the Hazardous and Radioactive Materials Bureau (HRMB). The NMED/SWQB and Ground Water Quality Bureau (GWQB) will be copied on all RFI Reports. Limitations in the use of the FIMAD data base prevent the ER Program from performing most data searches built on specific parameters ahead of the preparation of the RFI Report. So, although we would like to deliver data compilations for specific requests, it is not generally possible to deliver results ahead of the comprehensive data retrieval and analytical process that is involved in the compilation of an RFI Report. It is the intent of the project to make changes to FIMAD, or establish a separate data base, so that future data searches are possible, but unfortunately, there is no projection available for when restructuring can be completed for this purpose. To supplement this problem with regard to data from FIMAD being available ahead of the time when RFI Reports are prepared, we propose to submit AP 4.5 forms, as they are completed, to NMED/SWQB.

As I mentioned in the first paragraph of this letter, the two initiatives discussed above were underway at the time we received your letter. Monthly meetings with your bureaus were also being conducted to update your staff on the progress of these initiatives. We hope that the explanations with regard to the limitations in the ER Project serve to explain why progress on these initiatives has proceeded at the rates reported.

In addition to the above initiatives, other initiatives were also underway to address water quality concerns at the time of the receipt of your letter:

- Development of an Activity Tracking Data base for the 684 sites;

²AP 4.5 could be taken into consideration in prioritization of next year's baseline as a modifying factor to the SRS.

- Refinement of the AP 4.5 site evaluation checklist for the purpose of prioritizing field activities;
- Implementation of over 150 BMPs at ER PRSs, approximately half of which are on the list of 684 sites;
- Recommendation of no further action at approximately 200 of the 684 sites;
- Implementation of approximately 21 remediations within watercourses during FY 1996
- Implementation of approximately 20 remediations within watercourses during FY 1997;
- Planned implementation of approximately 22 remediations within watercourses during FY 1998;
- Development of a facility-wide Watershed Management Program and Management Plan during FY 1997 and FY 1998;
- Monthly meetings with SWQB and GWQB beginning in July of 1996;
- Project-wide training on surface water issues.

DOE and LANL are committed to working with NMED in a cooperative effort to achieve positive solutions and form common goals. Updates on progress will be regularly provided in the monthly meetings with your staff. Both of us would be pleased to discuss this matter further, if you believe that would be appropriate.



Thomas E. Baca, Director
Environmental Management
Los Alamos National Laboratory

Sincerely,



G. Thomas Todd
Area Manager
Los Alamos Area Office

LAAMEP:9BK-021

Enclosure

cc:
See page 4

JUN 02 1997

Dr. Ed Kelley

4

cc w/enclosure:

Mr. Benito Garcia, Bureau Chief
Hazardous and Radioactive Materials
Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, New Mexico 87505

Ms. Marcy Leavitt, Bureau Chief
Ground Water Quality Bureau
New Mexico Environment Department
1190 St. Francis Drive
P. O. Box 26110
Santa Fe, NM 87502

Mr. Steve Yanicak, Point of Contact
Oversight Bureau
New Mexico Environment Department
LANL, MS-J993

Mr. Glenn Saums
Surface Water Quality Bureau
New Mexico Environment Department
1190 St. Francis Drive
P. O. Box 26110
Santa Fe, NM 87502



cc w/o enclosure:

J. Parker
DOE Oversight Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, NM 87505

G. T. Todd, Area Manager, LAAO
H. Le-Doux, Deputy Area Manager, LAAO
J. Vozella, AAMEP, LAAO
T. Taylor, LAAMEP, LAAO
B. Koch, LAAMEP, LAAO
D. Erickson, ESH-DO, LANL, MS-K491
T. Baca, EM, LANL, MS-J591
J. Jansen, EM/ER, LANL, MS-M992
D. McInroy, EM/ER, LANL, MS-M992
S. Rae, ESH-18, LANL, MS-K497
M. Alexander, ESH-18, LANL, MS-K497
EM/ER File, LANL, MS-M992
RPF, LANL, MS-M707

Watercourse List

PRS	ER Portion of AP 4.5 Completed	BMPs in Place	NFA Status
0-004	Yes	Yes	
0-015		No	
0-016	Yes	Yes	
0-027	Yes	Yes	
0-030(a)	Yes	Yes	Cleanup report Submitted
0-030(l)	Yes	Yes	Cleanup report Submitted
0-030(m)	Yes	Yes	Cleanup report Submitted
1-001(c)		No	NFA proposed in report/work plan
1-001(d)	Yes	Yes	Reviewed for RCRA and DOE NFA; Hg must be addressed for SWQB
1-001(f)	Yes	Yes	Cleanup report Submitted
1-002		No	NFA proposed in report/work plan
1-003(a)		No	NFA proposed in report/work plan
1-003(d)	Yes	Yes	Cleanup report Submitted
1-003(e)		No	NFA proposed in report/work plan
1-006(a)		No	NFA proposed in report/work plan
1-006(b)		No	NFA proposed in report/work plan
1-006(c)		No	NFA proposed in report/work plan
1-006(d)		No	NFA proposed in report/work plan
1-006(e)		No	
1-006(f)		No	
1-006(g)		No	
1-006(h)		No	NFA proposed in report/work plan
1-006(i)		No	
1-006(j)		No	
1-006(k)		No	
1-006(l)		No	
1-006(m)		No	
1-006(n)		No	NFA proposed in report/work plan
1-006(o)		No	NFA proposed in report/work plan
1-006(p)		No	
1-006(q)		No	

Watercourse List

1-006(r)		No	
1-006(s)		No	
1-006(t)		No	
10-001(a)	Yes	No	NFA proposed in report/work plan
10-001(b)		No	NFA proposed in report/work plan
10-001(c)		No	NFA proposed in report/work plan
10-001(d)		No	NFA proposed in report/work plan
10-002(a)	Yes	Yes	NFA proposed in report/work plan
10-002(b)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-003(a)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-003(b)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-003(c)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-003(d)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-003(e)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-003(f)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-003(g)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-003(h)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-003(i)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-003(j)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-003(k)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-003(l)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-003(m)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-003(n)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-003(o)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-004(a)	Yes	Yes	NFA proposed in report/work plan
10-004(b)	Yes	Yes	NFA proposed in report/work plan
10-005	Yes	Yes	NFA proposed in report/work plan
10-007		Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
10-008		No	
10-009		No	
11-001(a)		No	
11-001(b)		No	
11-002		No	

Watercourse List

11-003(b)		No	
11-004(a)		No	
11-004(b)		No	
11-004(c)		No	
11-004(d)		No	
11-004(e)		No	
11-004(f)		No	
11-006(b)		No	
11-006(c)		No	
11-006(d)		No	
11-010(b)		No	
11-011(a)		No	
11-011(b)		No	
11-011(c)		No	NFA proposed in Permit Mod 3/95
11-011(d)		No	
11-012(a)		No	
11-012(b)		No	
11-012(d)		No	
12-001(a)	Yes	No	Cleanup report Submitted
12-001(b)	Yes	No	
13-001		No	
13-002		No	
14-001(f)	Yes	No	
14-001(g)	Yes	No	
14-002(a)	Yes	No	
14-003	Yes	Yes	
14-005	Yes	No	AA concurrence for deferral
14-009	Yes	Yes	
14-010	Yes	No	
15-001		No	
15-002		No	NFA proposed in report/work plan
15-003		No	
15-004(b)	Yes	No	Cleanup report Submitted

Watercourse List

15-004(f)		No	
15-004(g)	Yes	No	
15-004(h)		No	
15-006(a)		No	
15-006(b)		No	
15-006(c)		No	
15-006(d)		No	NFA proposed in report/work plan
15-007(a)		No	
15-007(b)		No	
15-007(c)		No	
15-008(a)		No	
15-008(b)		No	
15-008(c)		No	
15-008(d)		No	
15-008(f)		No	
15-008(g)		No	
15-009(g)		No	
15-010(c)		No	NFA proposed in report/work plan
15-011(b)		No	NFA proposed in report/work plan
15-011(c)		No	NFA proposed in report/work plan
15-012(a)		No	NFA proposed in report/work plan
15-012(b)		No	
15-014(a)		No	NFA proposed in report/work plan
15-014(b)		No	NFA proposed in report/work plan
15-014(g)		No	
15-014(h)		No	
15-014(i)		No	NFA proposed in report/work plan
15-014(j)		No	NFA proposed in report/work plan
15-014(k)		No	NFA proposed in report/work plan
15-014(l)		No	NFA proposed in report/work plan
15-014(m)		No	Final AA Approval of Permit Mod 12/10/96
16-003(a)		No	
16-003(b)		No	

Watercourse List

16-003(f)		No	
16-003(i)		No	
16-003(j)		No	
16-003(l)		No	
16-003(n)		No	
16-003(o)		No	
16-003(p)		No	
16-004(a)		No	
16-004(b)		No	
16-004(c)		No	
16-004(d)		No	
16-004(e)		No	
16-004(f)		No	
16-009(a)		No	
16-010(a)		No	
16-010(b)		No	
16-010(c)		No	
16-010(d)		No	
16-010(e)		No	
16-010(f)		No	
16-010(h)		No	
16-010(i)		No	
16-010(j)		No	
16-010(k)		No	
16-010(l)		No	
16-010(m)		No	
16-010(n)		No	
16-013		No	
16-015(a)		No	
16-015(b)		No	
16-015(c)		No	
16-015(d)		No	
16-016(a)		No	

Watercourse List

16-016(c)		No	
16-018		Yes	
16-019		No	
16-020		No	
16-021(a)		No	
16-021(c)	Yes	Yes	
16-023(b)		No	
16-024(a)		No	
16-024(b)		No	
16-024(c)		No	
16-024(d)		No	
16-024(e)		No	
16-024(f)		No	
16-024(g)		No	
16-024(h)		No	
16-024(i)		No	
16-024(j)		No	
16-024(k)		No	
16-024(l)		No	
16-024(m)		No	
16-024(n)		No	
16-024(o)		No	
16-024(p)		No	
16-024(q)		No	
16-024(r)		No	
16-024(s)		No	
16-024(t)		No	
16-024(u)		No	
16-024(v)		No	
16-025(a)		No	
16-025(a2)		No	
16-025(b)		No	
16-025(b2)		No	

Watercourse List

16-025(c2)		No	
16-025(d)		No	
16-025(d2)		No	
16-025(e)		No	
16-025(f)		No	
16-025(g)		No	
16-025(h)		No	
16-025(i)		No	
16-025(j)		No	
16-025(k)		No	
16-025(l)		No	
16-025(m)		No	
16-025(n)		No	
16-025(o)		No	
16-025(p)		No	
16-025(q)		No	
16-025(r)		No	
16-025(s)		No	
16-025(t)		No	
16-025(u)		No	
16-025(v)		No	
16-025(w)		No	
16-025(x)		No	
16-025(y)		No	
16-025(z)		No	
16-026(a)		No	NFA proposed in report/work plan
16-026(a2)		No	NFA proposed in report/work plan
16-026(b)		Yes	
16-026(b2)		No	
16-026(c)		No	
16-026(c2)		No	
16-026(d)		No	
16-026(d2)		No	NFA proposed in report/work plan

Watercourse List

16-026(e)		No	
16-026(e2)		No	NFA proposed in report/work plan
16-026(f)		No	NFA proposed in report/work plan
16-026(f2)		No	NFA proposed in report/work plan
16-026(g)		No	NFA proposed in report/work plan
16-026(g2)		No	NFA proposed in report/work plan
16-026(h)		No	NFA proposed in report/work plan
16-026(h2)		No	
16-026(i)		No	
16-026(j)		No	
16-026(j2)		No	
16-026(k)		No	NFA proposed in report/work plan
16-026(k2)		No	
16-026(l)		No	NFA proposed in report/work plan
16-026(q)		No	
16-026(r)		No	
16-026(s)		No	
16-026(t)		No	NFA proposed in report/work plan
16-026(u)		No	
16-026(v)		No	
16-026(w)		No	
16-026(x)		No	NFA proposed in report/work plan
16-026(y)		No	NFA proposed in report/work plan
16-026(z)		No	NFA proposed in report/work plan
16-028(b)		No	
16-028(c)		No	
16-028(d)		No	
16-029(a2)		No	
16-029(b2)		No	
16-029(c2)		No	
16-029(d)		No	
16-029(d2)		No	
16-029(e)		No	

Watercourse List

16-029(e2)		No	
16-029(f)		No	
16-029(f2)		No	
16-029(g)		No	
16-029(h)		No	
16-029(h2)		No	
16-029(i)		No	NFA proposed in report/work plan
16-029(j)		No	
16-029(r)		No	
16-029(v)		No	
16-029(y)		No	
16-029(z)		No	
16-030(a)		No	
16-030(d)		Yes	
16-030(g)		No	
16-030(h)		Yes	
16-031(a)		No	
16-031(b)		No	
16-031(d)		No	
16-032(a)		No	
16-034(a)		No	
16-034(b)		No	
16-034(c)		No	
16-034(d)		No	
16-034(e)		No	
16-034(f)		No	
16-034(h)		No	
16-034(j)		No	
16-034(l)		No	
16-034(m)		No	
16-034(n)		No	
16-034(o)		No	
16-034(p)		No	

Watercourse List

16-035		No	
16-036		No	
18-003(a)		No	
18-003(b)		No	
18-003(c)		No	
18-003(d)		No	
18-010(a)		No	
18-010(b)		No	
18-010(c)		No	
18-010(d)		No	
18-010(e)		No	
18-010(f)		No	
18-012(a)		No	NFA proposed in report/work plan
18-012(b)		No	NFA proposed in report/work plan
18-012(c)		No	
18-012(d)		No	
2-003(a)		No	
2-003(b)		No	
2-003(d)		No	
2-005		No	
2-006(a)		No	
2-006(b)		No	
2-006(c)		No	
2-006(d)		No	
2-006(e)		No	
2-007		No	
2-008(a)		No	
2-008(c)		No	
2-009(a)		No	
2-009(b)		No	
2-009(c)		No	
2-009(d)		No	
2-010		No	

Watercourse List

2-011(a)		No	
2-011(b)		No	
2-011(c)		No	
2-011(d)		No	
2-011(e)		No	
20-002(d)		No	
21-003	Yes	Yes	
21-004(d)		No	
21-006(b)		No	
21-011(c)	Yes	No	
21-011(k)	Yes	Yes	
21-016(a)	Yes	Yes	
21-016(b)	Yes	Yes	
21-016(c)	Yes	Yes	
21-022(h)		No	
21-023(c)		No	
21-024(a)		No	
21-024(b)		Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
21-024(c)	Yes	No	
21-024(d)	Yes	Yes	Cleanup report Submitted
21-024(e)	Yes	Yes	Cleanup report Submitted
21-024(f)		No	NFA proposed in report/work plan
21-024(g)		No	NFA proposed in report/work plan
21-024(h)	Yes	Yes	Cleanup report Submitted
21-024(i)	Yes	Yes	
21-024(j)		No	Final AA Approval of Permit Mod 12/10/96
21-024(k)		No	Final AA Approval of Permit Mod 12/10/96
21-024(l)		No	NFA proposed in report/work plan
21-024(m)		No	Final AA Approval of Permit Mod 12/10/96
21-024(n)		No	Final AA Approval of Permit Mod 12/10/96
21-024(o)		No	Final AA Approval of Permit Mod 12/10/96
21-026(d)		No	
21-027(a)	Yes	No	

Watercourse List

21-027(b)		No	Final AA Approval of Permit Mod 12/10/96
21-027(d)		No	Final AA Approval of Permit Mod 12/10/96
21-029	Yes	Yes	Cleanup report Submitted
22-010(a)	Yes	No	
22-010(b)	Yes	No	
22-014(a)	Yes	No	
22-014(b)	Yes	No	
22-015(a)	Yes	No	
22-015(b)	Yes	No	
22-015(c)	Yes	Yes	EC Report Submitted
22-015(d)	Yes	No	
22-015(e)	Yes	No	
22-016	Yes	No	
3-003(a)		No	NFA proposed in report/work plan
3-003(b)		No	NFA proposed in report/work plan
3-003(m)		No	
3-010(a)	Yes	Yes	NFA proposed in report/work plan
3-011		No	NFA proposed in WP/RFI report that received NOD/disapproval letter from AA.
3-012(a)		No	Final AA Approval of Permit Mod 12/10/96
3-012(b)	Yes	Yes	
3-013(a)		No	NFA proposed in report/work plan
3-013(b)		No	
3-014(b2)		No	
3-014(c2)		No	
3-015		No	NFA proposed in report/work plan
3-020(b)		No	
3-021		No	
3-029		No	NFA proposed in WP/RFI report that received NOD/disapproval letter from AA.
3-042		No	
3-045(a)		No	NFA proposed in Permit Mod 9/96
3-045(b)		No	
3-045(c)		No	
3-045(e)		No	NFA proposed in Permit Mod 9/96

Watercourse List

3-045(f)		No	NFA proposed in Permit Mod 9/96
3-045(g)		No	
3-045(h)		No	NFA proposed in Permit Mod 9/96
3-045(i)		No	NFA proposed in Permit Mod 9/96
3-047(d)	Yes	Yes	
3-049(a)		No	
3-049(c)		No	NFA proposed in Permit Mod 9/96
3-049(d)		No	NFA proposed in Permit Mod 9/96
3-049(e)		No	NFA proposed in Permit Mod 9/96
3-052(a)		No	
3-052(b)		No	
3-052(c)		No	NFA proposed in Permit Mod 9/96
3-052(d)		No	
3-052(e)		No	
3-052(f)		No	NFA proposed in WP/RFI report that received NOD/disapproval letter from AA.
3-054(a)		No	NFA proposed in Permit Mod 9/96
3-054(b)		No	
3-054(c)		No	NFA proposed in WP/RFI report that received NOD/disapproval letter from AA.
3-054(d)		No	NFA proposed in Permit Mod 9/96
3-054(e)		No	
3-055(a)		No	NFA proposed in Permit Mod 9/96
3-055(b)		No	
3-055(c)		No	NFA proposed in WP/RFI report that received NOD/disapproval letter from AA.
3-055(d)		No	NFA proposed in Permit Mod 9/96
3-056(c)	Yes	Yes	EC Permit Mod Submitted
3-059		No	
31-001		No	Cleanup report Submitted
32-002(a)	Yes	Yes	Cleanup report Submitted
32-002(b)	Yes	Yes	Cleanup report Submitted
32-003	Yes	Yes	
32-004	Yes	Yes	
33-002(d)	Yes	No	NFA proposed in report/work plan
33-002(e)	Yes	No	NFA proposed in report/work plan

Watercourse List

33-004(i)		No	NFA proposed in report/work plan
33-004(j)	Yes	No	NFA proposed in report/work plan
33-004(k)		No	
33-004(l)		No	
33-006(a)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
33-007(b)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
33-009	Yes	Yes	
33-010(c)	Yes	Yes	Reviewed for RCRA NFA; Rad/other Component must be addressed.
33-011(a)		No	
33-011(d)		No	
33-013		No	
33-017		No	
35-003(d)	Yes	Yes	
35-003(j)		No	Reviewed for RCRA NFA; Rad/other Component must be addressed.
35-003(k)		No	Reviewed for RCRA NFA; Rad/other Component must be addressed.
35-003(l)	Yes	Yes	
35-003(q)	Yes	Yes	
35-003(r)	Yes	No	
35-004(a)		No	Reviewed for RCRA NFA; Rad/other Component must be addressed.
35-004(b)		No	NFA proposed in report/work plan
35-004(g)		No	Reviewed for RCRA NFA; Rad/other Component must be addressed.
35-004(m)		No	
35-005(b)		No	
35-006		No	NFA proposed in Permit Mod 3/95
35-008	Yes	No	
35-009(a)		No	NFA proposed in cleanup report; Rad/other Component must be addressed.
35-009(b)		No	NFA proposed in cleanup report; Rad/other Component must be addressed.
35-009(c)		No	NFA proposed in cleanup report; Rad/other Component must be addressed.
35-009(d)		No	NFA proposed in cleanup report; Rad/other Component must be addressed.
35-009(e)		No	Reviewed for RCRA NFA; Rad/other Component must be addressed.
35-010(a)		No	
35-010(b)		No	
35-010(c)		No	

Watercourse List

35-010(d)		No	
35-010(e)		No	
35-014(a)		No	Reviewed for RCRA NFA; Rad/other Component must be addressed.
35-014(d)		No	
35-014(e)	Yes	No	
35-014(f)	Yes	No	
35-014(g)		No	Reviewed for RCRA NFA; Rad/other Component must be addressed.
35-014(g2)		No	
35-014(g3)		No	
35-015(a)		No	
35-015(b)		No	NFA proposed in report/work plan
35-016(a)		No	
35-016(b)		No	
35-016(c)		No	
35-016(d)		No	
35-016(e)		No	
35-016(f)		No	
35-016(g)	Yes	No	
35-016(h)	Yes	No	
35-016(i)		No	Reviewed for RCRA NFA; Rad/other Component must be addressed.
35-016(j)		No	
35-016(k)		No	
35-016(l)		No	
35-016(m)		No	
35-016(n)		No	
35-016(o)		No	
35-016(p)		No	
35-016(q)		No	
35-018(a)	Yes	No	
36-004(a)		No	
36-004(b)		No	
36-004(c)		No	
36-004(d)		No	NFA proposed for Deferral

Watercourse List

36-004(e)		No	
36-005		No	
36-006		No	NFA proposed in report/work plan
36-008(f)		No	
39-002(b)		No	
39-002(c)		No	
39-002(d)		No	
39-002(f)		No	
39-004(a)		No	
39-004(b)		No	
39-004(c)		No	
39-004(d)		No	
39-004(e)		No	
39-008		No	
4-001		No	
4-002		No	
4-003(a)		No	
4-003(b)		No	
4-004		No	
40-001(b)	Yes	No	
40-001(c)	Yes	No	
40-005	Yes	No	
40-006(a)	Yes	No	
41-002(b)		No	
41-002(c)		No	
42-001(a)	Yes	No	NFA proposed in report/work plan
42-002(b)	Yes	No	NFA proposed in report/work plan
42-003	Yes	No	NFA proposed in report/work plan
42-004		No	
43-001(b1)		No	
43-001(b2)		No	
45-003		No	NFA proposed in report/work plan
45-004		No	NFA proposed in report/work plan

Watercourse List

46-002		No	
46-004(a2)		No	
46-004(c)		No	
46-004(c2)		No	NFA proposed in report/work plan
46-004(d)		No	
46-004(e)		No	
46-004(f)		No	
46-004(g)	Yes	No	
46-004(h)	Yes	No	NFA proposed in report/work plan
46-004(i)		No	
46-004(j)		No	
46-004(k)		No	
46-004(l)		No	
46-004(m)	Yes	No	NFA proposed in report/work plan
46-004(n)		No	
46-004(o)		No	
46-004(p)		No	
46-004(q)	Yes	No	
46-004(r)		No	
46-004(s)	Yes	No	
46-004(t)		No	
46-004(u)	Yes	No	NFA proposed in report/work plan
46-004(v)	Yes	No	NFA proposed in report/work plan
46-004(w)		No	
46-004(x)	Yes	No	NFA proposed in report/work plan
46-004(y)	Yes	No	NFA proposed in report/work plan
46-004(z)	Yes	No	NFA proposed in report/work plan
46-005		No	
46-006(d)	Yes	No	
46-008(a)		No	
46-008(d)		No	
46-008(e)		No	
46-008(f)		No	

Watercourse List

46-008(g)		No	
46-009(a)		No	
46-009(b)		No	
48-001	Yes	No	
48-002(a)	Yes	Yes	EC Report Submitted
48-002(b)	Yes	No	EC Report Submitted
48-002(e)	Yes	No	
48-003	Yes	No	Reviewed for RCRA NFA; Rad/other Component must be addressed.
48-007(a)	Yes	No	Reviewed for RCRA NFA; Rad/other Component must be addressed.
48-007(b)	Yes	No	Reviewed for RCRA NFA; Rad/other Component must be addressed.
48-007(c)	Yes	No	Reviewed for RCRA NFA; Rad/other Component must be addressed.
48-007(d)	Yes	No	Reviewed for RCRA NFA; Rad/other Component must be addressed.
48-007(e)	Yes	No	
48-007(f)		No	Reviewed for RCRA NFA; Rad/other Component must be addressed.
48-010	Yes	No	Reviewed for RCRA NFA; Rad/other Component must be addressed.
5-001(a)		No	
5-001(b)		No	
5-001(c)		No	
5-002		No	
5-004		No	
5-005(a)		No	
5-005(b)		No	
5-006(b)		No	
5-006(c)		No	
5-006(e)		No	
5-006(h)		No	
50-006(a)	Yes	Yes	
52-002(a)		No	
53-002(a)		No	
53-008		No	
53-012(e)		No	
54-001(d)	Yes	No	
54-015(a)	Yes	No	

Watercourse List

54-015(b)	Yes	No	
54-015(c)	Yes	No	
54-015(d)	Yes	No	
54-015(e)	Yes	No	
54-015(f)	Yes	No	
55-011(a)		No	
55-011(b)		No	
55-011(c)		No	
55-011(d)		No	
55-011(e)		No	
57-001(b)	Yes	No	
57-002	Yes	No	
57-004(a)	Yes	No	
57-006	Yes	No	
57-007	Yes	No	
59-004		No	
6-001(a)	Yes	No	
6-001(b)	Yes	No	
6-003(c)	Yes	No	
63-001(a)		No	
63-001(b)		No	
72-001		No	
73-001(a)		No	
73-002(b)		No	
73-004(a)		Yes	Cleanup report Submitted
73-004(b)		No	Cleanup report Submitted
73-004(c)		No	
73-006		Yes	
8-003(a)	Yes	No	EC Report Submitted
8-004(a)	Yes	No	
8-004(b)	Yes	No	
8-004(c)	Yes	No	
8-004(d)	Yes	No	NFA proposed in report/work plan

Watercourse List

8-009(a)	Yes	No	
8-009(c)	Yes	No	
8-009(f)	Yes	No	
9-003(a)	Yes	No	
9-003(b)	Yes	No	
9-003(e)	Yes	No	
9-006	Yes	No	
9-013	Yes	Yes	EC Report Submitted
C-0-001		No	
C-0-002		No	
C-0-003		No	
C-0-004		No	
C-0-005		No	
C-0-006		No	
C-0-007		No	
C-0-008		No	
C-0-009		No	
C-0-010		No	
C-0-011		No	
C-0-012		No	
C-0-013		No	
C-0-014		No	
C-0-015		No	
C-0-016		No	
C-0-017		No	
C-0-018		No	
C-0-019		No	
C-0-041	Yes	No	
C-10-001		No	
C-15-001		No	
C-15-004		No	
C-15-005		No	
C-15-006		No	

Watercourse List

C-15-007		No	
C-16-002		No	
C-16-005		No	
C-16-006		No	
C-16-011		No	
C-16-017		No	
C-16-025		No	
C-16-026		No	
C-16-028		No	
C-16-030		No	
C-16-031		No	
C-16-060		No	
C-16-065		No	
C-16-068		No	
C-16-069		No	
C-16-074		No	
C-3-005		No	
C-3-010		No	
C-3-014		No	
C-3-016		No	
C-33-001		No	
C-36-003		No	
C-36-006(e)		No	
C-41-004		No	
C-43-001		No	
C-46-001		No	