

(12)

ERID 62760

U.S. GOVERNMENT PRINTING OFFICE

# Los Alamos National Laboratory

UNIVERSITY OF CALIFORNIA



Date: February 11, 1999  
Refer to: EM/ER:99-034

Mr. Ted Taylor  
US Department of Energy  
Los Alamos Area Office, MS A316  
Los Alamos, NM 87545

**SUBJECT: DOCUMENTATION OF ECOLOGICAL RISK ASSESSMENT AND OTHER APPLICABLE REGULATIONS AND STANDARDS FOR 37 ADMINISTRATIVE NFA PROPOSALS (FUNCTIONAL AREA A.1.2 PERFORMANCE MEASURE)**

Dear Ted:

Enclosed is a copy of the first report prepared to partially satisfy Functional Area A.1.2 of the Fiscal Year 1999 Performance Measures. Specifically, this report documents the review of ecological risk and other applicable regulations and standards for 37 potential release sites (PRSs) that have been proposed for no further action (NFA) in previous years. Thirty-six of these sites are in Module VIII of the Laboratory's Hazardous Waste Facility Permit, and were proposed for NFA within work plans, Resource Conservation and Recovery Act Facility Investigation reports, and/or permit modification requests submitted to the New Mexico Environment Department in March and September 1995, and September 1996. These 37 sites were not included in any other deliverable intended to satisfy Performance Measures associated with past performance periods.

These PRSs have been evaluated for all concerns and upon concurrence from your office, we do not anticipate these sites will need any further investigation. Please let us know of the status of your concurrence. Los Alamos National Laboratory anticipates the generation and delivery of another two to three additional reports throughout this fiscal year in order to achieve Performance Measure A.1.2.

Should you have any questions, please contact Dave McInroy at (505) 667-0819.

Sincerely,

Julie A. Canepa, Program Manager  
Environmental Restoration Project

Received by [unclear]  
FEB 19 1999  
[unclear]

JC/PB/gt

Enclosure(s): (1) Functional Area A.1.2 of FY 1999 Appendix F Performance Measures  
(2) Documentation of Ecological Risk Assessment and Other Applicable Regulations And Standards For 37 Administrative NFA Proposals



Mr. Ted Taylor  
EM/ER:99-034

-2-

February 11, 1999

Cy (w/encs.)

D. Boak, TSA-10, MS M992  
D. McInroy, EM/ER, MS M992  
T. Taylor, LAAO, MS A316  
RPF, Records Package 325, MS M707

Cy (w/o encs.):

T. Baca, EM-DO, MS J591  
B. Cionek, EM-PPC, MS J552  
D. Daymon, EM/ER, MS M992  
R. Hutton, SAIC, MS J521  
B. Martin, EM/ER, MS M992  
G. Rael, DOE-AL, MS A906  
T. Trujillo, DOE-AL, MS A906  
EM/ER File, MS M992  
Tracker, RM 604, MS M992

**Los Alamos National Laboratory  
Environmental Restoration Project  
Fiscal Year 1999 Appendix F Performance Measures**

N. GONZALEZ . F. J.

**A.1.2. Continued Work on No Further Action (NFA) for Workoff PRSs** **Weight 10%**

Unsatisfactory	Submit to DOE completed NFA recommendations for fewer than 96 Workoff PRSs.
Marginal	Submit to DOE 128 completed NFA recommendations for Workoff PRSs.
Good	Submit to DOE (see Assumption 3) 160 completed NFA recommendations for Workoff PRSs.
Excellent	Submit to DOE 192 completed NFA recommendations for Workoff PRSs
Outstanding	Submit to DOE 224 completed NFA recommendations for Workoff PRSs.

Assumptions

1. A "Workoff PRS" is defined as a PRS for which (a) LANL asserts that an NFA recommendation is appropriate, and (b) LANL has submitted an RFI Report or other appropriate RCRA (Resource Conservation and Recovery Act) document recommending NFA for human health risk only during a previous fiscal year. Further, an NFA recommendation is one that has evaluated all of the criteria for the evaluation of PRSs set out in paragraph 4 below. An NFA recommendation may be documented in an RFI Report, a VCM Report, a Permit Modification, or other appropriate RCRA documentation.
2. The number of NFA recommendations to obtain a "good" rating is based on agreement by LANL and DOE/LAAO, taking AA requirements, needs and priorities into consideration. The other ratings are based on 20% increments and decrements from the numeric value corresponding to "good."
3. The work performed in FY99 for NFA recommendations will include an evaluation of each PRS for surface water [following the ER Project SOP 2.1, *Surface Water Site Assessments* (being drafted)], other applicable regulations and standards associated with groundwater and/or Underground Storage Tanks [following guidance received from NMED regarding acceptance of NFA recommendations (Letter from Ed Kelley, NMED, to T. J. Taylor, DOE-LAAO and J. Jansen, LANL, Re: No Further Action Determinations Los Alamos National Laboratory, NM0980010515, dated March 10, 1997), and an ecological risk evaluation [following the approach defined by Kelly, E., G. Gonzalez, L. Soholt, M. Hooten, and R. Rytli, 1998, "Screening Level Ecological Risk Assessment Approach for the Environmental Restoration Project at Los Alamos National Laboratory," LA-UR-98-1822, Los Alamos National Laboratory, Los Alamos, New Mexico].
4. The final recommendations will be documented in one or more documents by the end of FY99. This(ese) report(s) will list each PRS, the NFA criteria under which the PRS was originally recommended for NFA based on the human health evaluation (work conducted prior to FY99), document the results of the surface water screen, any other applicable regulations and/or standards associated with groundwater or UST evaluation, and the ecological risk screen or evaluation.
5. Credit for the accomplishment of the submittal of a PRS for completed NFA recommendation to the AA shall be obtained when the completed investigation recommendation document is submitted to and accepted by DOE-LAAO pursuant to the terms of General Assumption 6.

**Los Alamos National Laboratory  
Environmental Restoration Project  
Fiscal Year 1999 Appendix F Performance Measures**

6. For those reports to be submitted to NMED to obtain credit under this performance measure, the document must receive approval from DOE-LAAO prior to submittal to NMED. The reports to be submitted to NMED will be submitted to DOE-LAAO at least ten working days before it is due to NMED (as documented in the ER Project Baseline dated September 30, 1999, or as amended and documented through a BCP). The reports submitted only to DOE-LAAO will be submitted based on the schedule documented in the ER Project Baseline dated September 30, 1998, or as amended and documented through a BCP.

W-06-105-1-1-1

## DOCUMENTATION OF ECOLOGICAL RISK ASSESSMENT AND OTHER APPLICABLE REGULATIONS AND STANDARDS FOR 37 ADMINISTRATIVE NO FURTHER ACTION PROPOSALS

### 1.0 INTRODUCTION

#### 1.1 Background

Prior to Fiscal Year 1998 (FY98), the Los Alamos National Laboratory (the Laboratory) Environmental Restoration (ER) Project had investigated 1211 of its 2123 potential release sites (PRSs) for possible contamination from historical operations at the Laboratory. Based on human health evaluations of contaminant concentrations in soil, the Project determined that these sites need no further investigation. The written proposals for no further action determination have been presented to the Administrative Authority<sup>1</sup> (AA) for concurrence. Of the 1211 sites proposed for no further action, 578 of the proposals were based on administrative-type criteria, meaning that the determinations were based primarily on acceptable knowledge information supplemented with site visits and interviews. Subsequently, the sites were evaluated for ecological risk and for concerns regarding other applicable regulations and standards. Based on the results of the evaluation, this report presents supplemental written documentation supporting the no further action proposals. The other applicable regulations and standards investigated for this report include surface water and groundwater standards, air emissions, and underground storage tank regulations.

The AA makes the final determination on the no further action proposal. A determination by the AA that a site has not met the no further action criteria and therefore needs further investigation does not necessarily mean that remedial action is required. It can indicate that more information or further evaluation is needed. The results of any additional investigation may potentially lead to another proposal of no further action, a remedial action, a corrective measures study, or other appropriate actions.

This report includes a discussion of the no further action process and criteria for human health evaluations. It also describes the process pursued to evaluate ecological risk and the concerns regarding other applicable regulations and standards for 37 PRSs. The Laboratory's ER Project has no additional PRSs previously proposed for no further action based on administrative criteria that do not require supplementary investigation. These PRSs, as well as the other PRSs that have been proposed for no further action under Criteria 4 and 5, will be evaluated for ecological risks and other applicable regulations and standards and will be documented in future reports. The no further action proposals for the PRSs presented in this report include PRSs that LANL has gone back and reviewed the NFA proposals within RFI work plans, reports, and permit modification requests and found these proposals, which were originally based on human health evaluations, to still be valid.

#### 1.2 NFA Process and Criteria

Potential release sites have been proposed for no further action for human health evaluations in final reports written to demonstrate that sufficient acceptable knowledge information exists, site characterization data are complete, or cleanup confirmation data are complete. Documentation of the no further action proposal for each PRS must meet one or more of five criteria (listed below). The New Mexico Environment Department (NMED), the Environmental Protection Agency (EPA), Region 6, the Department of Energy (DOE) Los Alamos Area Office and Albuquerque Field Office, and the Laboratory have agreed upon these criteria.

---

<sup>1</sup> The New Mexico Environment Department Hazardous and Radioactive Materials Bureau is the Administrative Authority for those PRSs listed on the Laboratory's Hazardous and Solid Waste Amendments (HSWA) Module of the Resource Conservation and Recovery Act (RCRA) Operating Permit. The Department of Energy is the Administrative Authority for all other PRSs.

- No Further Action Criterion 1 - The Solid Waste Management Unit/Area of Concern (SWMU/AOC) cannot be located, does not exist, or is a duplicate SWMU/AOC.
- No Further Action Criterion 2 - The SWMU/AOC has never been used for the management (i.e. generation, treatment, storage, and/or disposal) of RCRA solid or hazardous wastes and/or constituents or other CERCLA hazardous substances.
- No Further Action Criterion 3 - No release to the environment has occurred nor is likely to occur in the future from the SWMU/AOC.
- No Further Action Criterion 4 - A release from the SWMU/AOC has occurred, but the SWMU/AOC was characterized and/or remediated under another authority which adequately addresses RCRA corrective action, and documentation, such as a closure letter, is available.
- No Further Action Criterion 5 - The SWMU/AOC has been characterized or remediated in accordance with current applicable state or federal regulations, and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use.

An administrative no further action proposal based on Criteria 1 through 3 is supported by acceptable knowledge information, which indicates that there has not been a release at the site, thus precluding the need for characterization and/or remediation. However, any of the five criteria can be supported with confirmatory sampling when necessary.

## 2.0 Evaluation of Ecological Risk and Other Applicable Regulations and Standards

### 2.1 Ecological Risk Screening and Assessment

An ecological risk assessment evaluates whether adverse ecological effects are occurring or may occur as a result of exposure to one or more stressors. The functions of an ecological risk assessment are to document whether actual or potential ecological risks exist at a site; identify which contaminants present at a site pose an ecological risk; and generate data to be used in evaluating cleanup options. The first step in an ecological risk assessment is the risk screening assessment. For this step, site-specific information is necessary for determining the nature and extent of contamination and for characterizing ecological receptors.

The screening process, described in the Laboratory's 1998 screening level risk assessment document, is composed of three parts, the scoping evaluation, the screening evaluation, and the risk management decision, which is based on an interpretation of the screening results. The first step of the scoping evaluation is to determine if the potential release site (PRS) is a candidate for an administrative no further action (NFA) decision based on the following NMED Criteria:

- NFA criterion 1 (site does not exist).
- NFA criterion 2 (site never used for solid waste or hazardous wastes).
- NFA criterion 3 (documentation of no release through an evaluation of process knowledge).

The ER Project personnel provide the justification for administrative NFA recommendations. Given one of the above criteria, environmental sample information is usually not required, and ecological evaluations are unnecessary (LANL 1998, 1428).

A no further action proposal based on Criterion 4 or 5 indicates that characterization and/or remediation was necessary before proposing no further action based on human health evaluations. Depending on the site history, knowledge about the site, and other site-specific information, an ecological risk screening determination may be necessary. If an ecological risk screening is performed, it is then documented in future reports.

None of the sites presented in this report require an ecological risk screening assessment. This conclusion is based on the supporting documentation for the original no further action proposal based on the human health evaluation. For example, several of the original proposals were based on the fact that the site never existed. It is clear that an ecological risk screening assessment would not be necessary in this example. The remaining sites have similar documentation supporting the no further action proposal.

## **2.2 Evaluation of Other Applicable Regulations and Standards**

The other applicable regulations and standards considered for this report include an evaluation of the sites regarding those standards which would be appropriate to incorporate into the development of a remediation goal or a comparative standard to determine the necessity for remediation. These would include evaluations of the sites regarding surface water and groundwater standards, air emissions, and underground storage tank regulations, where applicable. The original no further action proposals were based on human health evaluations of potential soil contamination. By considering the regulations and standards associated with surface water, groundwater, and air, a complete human health and ecological risk evaluation can be made and documented. Specifically, standards for maximum contaminant levels for drinking water and standards for wildlife habitat and livestock watering are considered as well as safe emissions standards for air. In addition, for those PRSs that are underground storage tanks, Subtitle I under 40 CFR (Code of Federal Regulations) Part 280 of RCRA, has very specific regulations that must be followed.

As with the ecological risk screening assessment previously described, in general, sites recommended for no further action based on the no further action Criteria 1 and 3, do not require an evaluation for these other applicable regulations and standards. For example, if the site never existed, or if there was no release to the environment, the other applicable regulations and standards do not apply. However, under Criteria 2, a site can be proposed for no further action based on a human health evaluation of soil because no RCRA solid or hazardous wastes and/or constituents or other CERCLA hazardous substances were managed. However, the applicable regulations and standards for surface water must consider whether there is debris in a watercourse regardless of whether it is a RCRA solid or hazardous waste and/or constituent or CERCLA hazardous substance. As with ecological risk, an evaluation of the sites must be made regarding the applicable regulations and standards of surface water, groundwater, and air emissions, as well as other potential regulations and standards depending on the site history, knowledge about the site, and other site-specific information.

All of the sites presented in this report have met the requirements of the surface water and groundwater standards, air emissions, and underground storage tank regulations based on the supporting documentation for the original no further action proposals for the human health evaluations.

## **3.0 Sites Proposed for No Further Action Based on Ecological Risk Assessment and Other Applicable Regulations and Standards**

The enclosed table (Table 1) lists 36 sites included in the HSWA Module and one site not included in the HSWA Module that have been proposed in work plans, reports and requests for Permit Modification before FY98. Only seven of these sites have received concurrence from NMED for no further action based on human health evaluations of contaminant concentrations in soil based on acceptable knowledge information (Criteria 1 through 3). Substantiating information for the remaining 30 sites has been provided to the state in the form of NOD responses, RSI responses, and RFI reports.

Table 1 includes the following:

- criteria under which the no further action proposal was made;
- PRS number;
- a brief description of the site;
- former Operable Unit (OU) number in which the PRS was located;
- document<sup>2</sup> which has the original no further action proposal;
- date of that document;
- date of the Class 3 permit modification in which the PRS was formally submitted to the AA for no further action (where applicable);
- a brief justification for the no further action proposal; and
- current status of the no further action proposal.

#### 4.0 References

LANL (Los Alamos National Laboratory), May 1998. "Screening Level Ecological Risk Assessment Approach for the Environmental Restoration Project at Los Alamos National Laboratory" (Draft), Los Alamos National Laboratory Report LA-UR-98-1822, ER ID Number 57916, Los Alamos, New Mexico. (LANL 1998, 1428)

#### Requests for Permit Modification

LANL (Los Alamos National Laboratory), March 1995. "Request for Permit Modification, Units Proposed for NFA," Los Alamos National Laboratory Report LA-UR-95-767, ER ID Number 45365, Los Alamos, New Mexico. (LANL 1995, 1249)

LANL (Los Alamos National Laboratory), September 1995. "Request for Permit Modification, Units Proposed for NFA," Los Alamos National Laboratory Report LA-UR-95-3319, ER ID Number 51878, Los Alamos, New Mexico. (LANL 1995, 1279)

LANL (Los Alamos National Laboratory), September 1996. "Request for Permit Modification, Units Proposed for NFA," Volumes I and II, Los Alamos National Laboratory Report LA-UR-96-3357, ER ID Numbers 55035, 55036, Los Alamos, New Mexico. (LANL 1996, 1420)

LANL (Los Alamos National Laboratory), March 1997. "Response to Notice of Determination for Requests for Permit Modification: Units Proposed for No Further Action March and September 1995," Los Alamos National Laboratory Report LA-UR-97-763, Los Alamos, New Mexico.

LANL (Los Alamos National Laboratory), October 1997. "Response to Notice of Determination for Requests for Permit Modification: Units Proposed for No Further Action September 1996," Los Alamos National Laboratory Report LA-UR-97-2875, Los Alamos, New Mexico.

<sup>2</sup> The pages for the location of the original proposal are included in this column as well as a reference for each document. The list of references can be found at the end of this report.

LANL (Los Alamos National Laboratory), May 1998. "PRS 55-009 Addendum to Notice of Determination for Requests for Permit Modification: Units Proposed for No Further Action, March and September 1995," Los Alamos National Laboratory EM/ER: 98-175, Los Alamos, New Mexico.

RFI Work Plans

LANL (Los Alamos National Laboratory), May 1992. "RFI Work Plan for Operable Unit 1071," Los Alamos National Laboratory Report LA-UR-92-810, ER ID Number 52857, Los Alamos, New Mexico. (LANL 1992, 0781)

LANL (Los Alamos National Laboratory), May 1992. "RFI Work Plan for Operable Unit 1078," Los Alamos National Laboratory Report LA-UR-92-368, ER ID Number 43454, Los Alamos, New Mexico. (LANL 1992, 0782)

LANL (Los Alamos National Laboratory), May 1992. "RFI Work Plan for Operable Unit 1079," Los Alamos National Laboratory Report LA-UR-92-850, ER ID Number 7668, Los Alamos, New Mexico. (LANL 1992, 0736)

LANL (Los Alamos National Laboratory), May 1992. "RFI Work Plan for Operable Unit 1122," Los Alamos National Laboratory Report LA-UR-92-925, ER ID Number 7671, Los Alamos, New Mexico. (LANL 1992, 0784)

LANL (Los Alamos National Laboratory), May 1992. "RFI Work Plan for Operable Unit 1129," Los Alamos National Laboratory Report LA-UR-92-800, ER ID Number 7666, Los Alamos, New Mexico. (LANL 1992, 0785)

LANL (Los Alamos National Laboratory), May 1992. "RFI Work Plan for Operable Unit 1148," Los Alamos National Laboratory Report LA-UR-92-855, ER ID Number 7669, Los Alamos, New Mexico. (LANL 1992, 0788)

LANL (Los Alamos National Laboratory), May 1993. "RFI Work Plan for Operable Unit 1093," Los Alamos National Laboratory Report LA-UR-93-422, ER ID Number 15310, Los Alamos, New Mexico. (LANL 1993, 1085)

LANL (Los Alamos National Laboratory), June 1993. "RFI Work Plan for Operable Unit 1098," Los Alamos National Laboratory Report LA-UR-92-3825, ER ID Number 15314, Los Alamos, New Mexico. (LANL 1993, 1086)

LANL (Los Alamos National Laboratory), July 1993. "RFI Work Plan for Operable Unit 1086," Los Alamos National Laboratory Report LA-UR-92-3968, Los Alamos, New Mexico. (LANL 1993, 1087)

LANL (Los Alamos National Laboratory), July 1993. "RFI Work Plan for Operable Unit 1114," Los Alamos National Laboratory Report LA-UR-93-1000, ER ID Number 20947, Los Alamos, New Mexico. (LANL 1993, 1090)

LANL (Los Alamos National Laboratory), July 1993. "RFI Work Plan for Operable Unit 1157," Los Alamos National Laboratory Report LA-UR-93-1230, ER ID Number 20949, Los Alamos, New Mexico. (LANL 1993, 1092)

LANL (Los Alamos National Laboratory), July 1993. "RFI Work Plan for Operable Unit 1082," Los Alamos National Laboratory Report LA-UR-93-1196, ER ID Number 20948, Los Alamos, New Mexico. (LANL 1993, 1094)

LANL (Los Alamos National Laboratory), May 1994. "RFI Work Plan for Operable Unit 1085," Los Alamos National Laboratory Report LA-UR-94-1033, ER ID Number 32033, Los Alamos, New Mexico. (LANL 1994, 1156)

LANL (Los Alamos National Laboratory), May 1994. "RFI Work Plan for Operable Unit 1100," Los Alamos National Laboratory Report LA-UR-94-1097, ER ID Number 38879, Los Alamos, New Mexico. (LANL 1994, 1157)

LANL (Los Alamos National Laboratory), May 1994. "RFI Work Plan for Operable Unit 1082," Addendum 1, Los Alamos National Laboratory Report LA-UR-94-1580, ER ID Number 39440, Los Alamos, New Mexico. (LANL 1994, 1158)

LANL (Los Alamos National Laboratory), July 1995. "RFI Work Plan for Operable Unit 1114, Addendum 1," Los Alamos National Laboratory Report LA-UR-95-731, Los Alamos, New Mexico. (LANL 1995, 1291)

RFI Reports

Environmental Restoration Project, February 1996. "RFI Report for Potential Release Sites at TA-14 and TA-12/67 (located in former Operable Unit 1085), Field Unit 2," Los Alamos National Laboratory Report LA-UR-96-511, Los Alamos, New Mexico. (Environmental Restoration Project 1996, 1394)

Taylor, T. J., January 9, 1995. "Approval of the OU 1082 RFI Work Plan," Department of Energy, Los Alamos Area Office Memorandum to H. Jansen (EM/ER) from T. J. Taylor (DOE/LAAO), Los Alamos, New Mexico. (Taylor 1995, 1357)

Environmental Restoration Project, February 1996. "RFI Report for 53 Potential Release Sites in TA-3, TA-59, TA-60, TA-61, Field Unit 1," Los Alamos National Laboratory Report LA-UR-96-726, Los Alamos, New Mexico. (Environmental Restoration Project 1996, ER ID 52930)

LANL (Los Alamos National Laboratory), July 1995. "RFI Work Plan for Operable Unit 1082," Addendum 2, Los Alamos National Laboratory Report LA-UR-95-1038, Los Alamos, New Mexico. (LANL 1995, 1342)

Environmental Restoration Project, March 1996. "RFI Report for Potential Release Sites at TAs-20, -53, and -72 (located in former Operable Unit 1100), Field Unit 2," Los Alamos National Laboratory Report LA-UR-96-906, Los Alamos, New Mexico. (Environmental Restoration Project 1996, ER ID 54466)

Environmental Restoration Project, October 1995. "RFI Report for Potential Release Sites 18-002(a-c), 18-003(a-h), 18-004(a, b), 18-005(a), 18-008, 18-010(b-f), 18-011, 18-012(a-c), 18-013, 27-002 (located in former Operable Unit 1093), Field Unit 2," Volumes I and II, Los Alamos National Laboratory Report LA-UR-95-3833, Los Alamos, New Mexico. (Environmental Restoration Project 1995, ER ID 52183, 51854)

Environmental Restoration Project, September 29, 1995. "RFI Report for MDA K, PRSs 33-002 (a, b, c, d, e), Field Unit 3," Los Alamos National Laboratory Report LA-UR-95-3624, Los Alamos, New Mexico. (Environmental Restoration Project 1995, 1263)

Environmental Restoration Project, January 1995. "RFI Report for Potential Release Sites 18-001(a), 18-001(b), 18-001(c), 18-007, 27-001, 27-003 (located in Former Operable Unit 1093), Field Unit 2," Los Alamos National Laboratory Report LA-UR-95-295, Los Alamos, New Mexico. (Environmental Restoration Project 1995, 1255)

Environmental Restoration Project, May 1996. "RFI Report for RFI Report for PRSs at TA-15 (located in former OU 1086, Field Unit 2)," Los Alamos National Laboratory Report LA-UR-95-1685, Los Alamos, New Mexico.

Environmental Restoration Project, September 1997. "RFI Report for Potential Release Sites 2-004, 2-008(b), 2-012 in TA-2 (located in Former Operable Unit 1098), Field Unit 4," Los Alamos National Laboratory Report LA-UR-96-3155, Los Alamos, New Mexico.

Environmental Restoration Project, September 1997. "NFA Report for Potential Release Sites in TA-33 (located in Former Operable Unit 1122, Field Unit 3)," Los Alamos National Laboratory Report LA-UR-97-2944, Los Alamos, New Mexico.

Environmental Restoration Project, September 1997. "NFA Report for Potential Release Sites in TA-00, 73, 73-004(c, d) (located in Former Operable Unit 1071)," Los Alamos National Laboratory Report LA-UR-97-3864, Los Alamos, New Mexico. (Environmental Restoration Project 1997, 395)

LA-UR-96-3155



Table 1  
Potential Release Sites Proposed for No Further Action Prior to FY99

NFA Criteria	FRS Number	FRS Description	Former OU	NFA Document	Document Date	Permit Mod Date	NFA Justification	NFA Status
1	01-001(i)	Septic Tank	1078	Workplan	5/20/92	3/28/95	Cannot be located	NMED Approval of Permit Mod 12/10/96
1	01-001(h)	Septic Tank	1078	Workplan	5/20/92	3/28/95	Does not exist	NMED Approval of Permit Mod 12/16/96
1	01-006(o)	Storm Drain System	1078	RFI Report	3/5/96	NA	Cannot be located, investigated as part of another FRS	RSI Response pending with NMED 12/19/97
1	02-008(b)	Outfall	1098	RFI Report	9/27/96	NA	Does not exist	NMED Approval of RFI Report 9/23/97
1	03-009(b)	Surface Disposal Area	1114	Workplan	7/7/93	3/28/95	Does not exist	NMED Approval of Permit Mod 12/10/96
1	03-009(c)	Surface Disposal Area	1114	Workplan	7/7/93	3/28/95	Does not exist	Permit Mod NOD Response pending w/ NMED 3/5/97
1	03-055(c)	Outfall	1114	Workplan	7/20/95	NA	Does not exist	Response to Disapproval Letter pending w/ NMED 10/25/96
1	10-006	Burn Site	1079	Workplan	5/1/92	3/28/95	Cannot be located, investigated as part of another FRS	Permit Mod NOD Response pending w/ NMED 2/16/96
1	13-003(a)	Septic Tank	1082	RFI Report	9/30/97	NA	Cannot be located, duplicate of 16-006	Duplicate PRS was part of NMED Approval of Permit Mod 12/10/96
1	14-002(f)	Junction Box	1085	RFI Report	2/15/96	NA	Cannot be located	NMED Concurrence in NOD 8/16/96
1	15-012(a)	Surface Disposal Area	1086	RFI Report	5/20/96	NA	Does not exist	NMED Approval in NOD 6/11/97
1	18-007	Buried Armored Vehicle	1093	RFI Report	1/25/95	9/30/96	Does not exist	NOD Responses pending w/ NMED 10/30/97
1	27-001	Buried Navy Guns	1093	RFI Report	1/25/95	9/30/96	Does not exist	NOD Responses pending w/ NMED 10/30/97
1	33-004(h)	Outfall	1122	RFI Report	9/26/97	NA	Cannot be located	RFI Report pending with NMED 9/26/97
1	55-009	Sumps and Tanks	1129	Workplan	5/20/92	3/28/95	Does not exist	Permit Mod NOD Response pending w/ NMED 3/5/97
1	61-004(a)	Septic Tank	1114	Workplan	7/7/93	3/28/95	Cannot be located, duplicate of 61-004(b)	Permit Mod NOD Response pending w/ NMED 3/5/97
1	73-004(c)	Septic system	1071	RFI Report	9/30/97	NA	Cannot be located	RFI Report pending with NMED 9/30/97 (Land Transfer)
2	03-001(m)	Storage Area - non-HSWA	1114	Workplan	7/7/93	9/29/95	Never used for RCRA solid or haz. waste; or CERCLA haz. substances	Permit Mod. Request pending w/ NMED 9/29/95
2	03-009(d)	Surface Disposal Area	1114	Workplan	7/7/93	9/29/95	Never used for RCRA solid or haz. waste; or CERCLA haz. substances	Permit Mod. NOD Response pending w/ NMED 3/5/97
2	03-009(g)	Surface Disposal Area	1114	Workplan	7/7/93	3/28/95	Never used for RCRA solid or haz. waste; or CERCLA haz. substances	Permit Mod NOD Response pending w/ NMED 3/5/97
2	03-054(d)	Outfall	1114	Workplan	7/20/95	9/30/96	Never used for RCRA solid or haz. waste; or CERCLA haz. substances	Permit Mod. NOD Response pending w/ NMED 10/30/97