Los Alamos Environmental Restoration Records Processing Facility

ER Record I.D.# 00055741

LOS ALAMOS NATIONAL LABORATORY
ENVIRONMENTAL RESTORATION
Records Processing Facility
ER Records Index Form

ER ID NO. 55741 *Date Received:* 4/24/97 *Processor:* DIC *Page Count:* 79

Privileged: (Y/N) N *Record Category:* P *Record Package No:* 283

FileFolder: FIELD UNIT 1 TA-3, 3-056(C) EXPEDITED CLEAN-UP //BD 588.01/FIELD PREPARATION

Correction: (Y/N) N *Corrected No.* *Corrected By Number:*

Administrative Record: (Y/N) Y

Refilmed: (Y/N) N *Old ER ID Number:* *New ER ID Number:*

Miscellaneous_Comments
OU 1114

30972

THIS FORM IS SUBJECT TO CHANGE. CONTACT THE RPF FOR LATEST VERSION. (JUNE 1997)

(19)

READINESS REVIEW MEETING ATTENDANCE FORM

DGF 7-6-95 Field OPERABLE UNIT 1 SITE(S) SWMU 5-018(c) DATE: 7/6/95

PRINTED NAME	SIGNATURE	ORGANIZATION/MS	PHONE
Derek Faulk	Derek Faulk	E.RM /MS M327	7-3700
Lynda [illegible]	[illegible]	[illegible] /MS [illegible]	[illegible]
Ron Blea	[illegible]	[illegible] /MS [illegible]	[illegible]
JOHN WILLIAMS	John Williams	[illegible] /MS M327	665-[illegible]
Clint J Dayman	Clint D. Dayman	ERA/[illegible] /MS M327	661-[illegible]
TERRY RUST	Terry Rust	ESH-14 /MS E525	665-8843
Joe [illegible]	Joe [illegible]	ESH-5 /MS K494	5-5[illegible]
		/MS	
		/MS	
		/MS	
		/MS	
		/MS	
		/MS	
		/MS	
		/MS	
		/MS	
		/MS	
		/MS	
		/MS	
		/MS	
		/MS	
		/MS	

READINESS REVIEW APPROVAL FORM

To: OUPL/TTL/Other Garry Allen, MS E525

From: Programmatic Project Leader or Senior Programmatic Project Leader

Subject: Readiness review approval for EU 1 Other SWMU 5-013(c)

Your readiness review meeting was successful, and all relevant requirements have been met. You may begin field work.

Signature Randy Scott for Garry Allen
Programmatic Project Leader or Senior Programmatic Project Leader

Date 8/27/95

Job No. _____

File No _____

Log No. _____

Date Filed _____

CH2M / Golder
QA Records

READINESS REVIEW CHECKLIST

DGF Field
7.6.95 Operable Unit 1

Site(s) SWMU 3-056(c) Date: 7-6-95

1. ENVIRONMENTAL SAFETY AND HEALTH (ES&H) QUESTIONNAIRE (SECTION 5.5.1.)

- ✓ National Environmental Policy Act
- ✓ Flood plains/wetlands assessment —
- ✓ Archaeology assessment
- ✓ Threatened and endangered species —
- — National Pollutant Discharge Elimination System (NPDES) —
- ✓ Septic system permit
- ✓ Resource Conservation and Recovery Act review for hazardous waste
- ✓ Airborne radioactive emissions review for permit
- ✓ Spill prevention control and countermeasures plan
- ✓ National emission standards for hazardous air pollutants (NESHAP)
- ✓ Occupational radiological hazard assessment

2. REGULATORY REVIEW (SECTION 5.5.2)

- ✓ EPA approval of RFI work plan / EC Plan Approval pending
- N/A NMED review

3. SITE-SPECIFIC HEALTH AND SAFETY PLAN (SECTION 5.5.5)

- ✓ Approved Site-Specific H&S Plan

4. WASTE MANAGEMENT PLAN (SECTION 5.5.6)

- — Waste management plan approved
- ✓ Onsite waste storage area established
- ✓ Arrangements for waste testing and disposal completed
- ✓ Waste minimization implemented
- ✓ Trained waste coordinator assigned

5. SUBCONTRACTOR HEALTH AND SAFETY PROGRAM (SECTION 5.5.7)

✓ Subcontractor H&S Program approved

Rollins + Sure Tech's corporate plans submitted to contracts who will then submit to ESH-1/5. Since Rollins has contract CST-5 may already have H&S Program @ ESH/5.

6. TRAINING REQUIREMENTS (INCLUDING OSHA REQUIREMENTS) (SECTION 5.5.8)

___ HAZWOPER training
___ Radiation worker training
___ Respirator fit test
___ Cardiopulmonary resuscitation
___ First aid
___ Hazard communication (HAZCOM), a module of general employee training
___ General employee training

7. WORK REQUESTS AND PERMITS (SECTION 5.5.9)

✓ Work request has been submitted for support services (backhoe, fences, electricity, etc.)
✓ Required H&S-related permits obtained
✓ Excavation/fill permit approved
✓ Confined-space permit approved
✓ Radiation work permit approved
___ Burn/hot work permit approved – pending anticipate of named subcont Joe Leach will initiate
✓ Lockout/tagout permit approved
✓ Special work permit obtained

8. SAMPLE COORDINATION FACILITY (SECTION 5.5.10)

✓ SCF manager contacted
✓ Notice of number of samples to be submitted, submittal date(s), and method of analysis identified for each sample
✓ Transportation of hazardous samples arranged
✓ Sampling supplies obtained from SCF
✓ Forms associated with ER Program SOPs
✓ EM-9 mobile laboratory scheduled
✓ Radiation screening for samples arranged

9. LABORATORY TRAINING (SECTION 5.5.11)

___ Badges issued and security briefing provided
___ Laboratory general employee training (if scheduled to be onsite over 10 days) provided
___ Radiation worker training (if radiation site) provided
___ Health physics checklist completed
___ Job description of key field positions (field team manager, field team leader, surveyor, etc.) and training requirements developed
___ Personnel training documentation (SOPs, APs, ARs, site-specific H&S plan, RFI work plan, etc.) completed

10. FIMAD AND RPF (SECTION 5.5.12 and 5.5.13)

___ Site identification numbers from FIMAD obtained
___ Appropriate map(s) and/or photographs obtained
___ Reservation of FIMAD still video camera made
___ Site briefing on records handling by manager of RPF

11. NOTIFICATIONS (SECTION 5.5.15)

___ ES&H officer and group leader at technical area where work will be performed
___ ER Program Office (EM-13) notifies DOE, EPA, NMED at least 15 days before the project team starts field work
___ H&S TTL
___ Sample Coordination Facility manager
___ Community relations project leader
___ Medical services (HS-2)
___ Non-DOE property owners of work dates and schedules (2 weeks written; 24 hour oral)
___ Laboratory divisions that control area of work
___ Other workers in the vicinity of the site
___ Los Alamos County

12. FINAL DETAILS

- ✓ Access agreement in place
- ✓ Site control and security planned and arranged
- ✓ Communication (mobile phones, Laboratory and HS radios) arranged
- ✓ Laboratory, non-DOE property owners, DOE, and Los Alamos County utilities notified
- ✓ Utilities located and marked
- ✓ Surface access (roads, keys, etc.) obtained
- ✓ Utilities required for field activities obtained
- ✓ Sanitation facilities contracted and in place
- ✓ FAX machine to receive shipping manifests from MAT-2
- ✓ SOPs in place

Programmatic Project Leader or Senior Programmatic Project Leader

Signature_____ Date_____

Outstanding items

- Meet w/ Rollin to discuss chem van
- WCS
- T&E Species / Wetlands ✓ done 7/6/95
- NPDES / WQCC part of SWPPP (call Mike Alexander)
- EPA Approval of EC Plan

Derek Fancher
7/6/95

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Bev Larson, ESH-20, M887

From: Derek Faulk

Date: 19 June, 1995

Regarding: Archaeological Status Report for Site Remediation Activities at SWMU 3-056(c)

Attached is a copy of an archeological status report dated June 6, 1994 for Environmental Restoration site characterization work performed in OU 1114 last year and a copy of the Expedited Cleanup Plan Summary for SWMU 3-056(c). All four maps attached to last year's status report are included. SWMU 3-056(c) is located within the survey area shown on Map#1. In the summer of 1995, ERM/Golder will be conducting an expedited cleanup of SWMU 3-056(c) located in TA-3. The SWMU is located adjacent to the JCI Utilities Building behind the LANL Power Plant off of Diamond Drive.

Site characterization activities were performed at SWMU 3-056(c) during the summer of 1994. This year's remedial activities involve the excavation and removal of approximately 30 cubic yards of soil contaminated with polychlorinated biphenyls. After completion of the work, the site will be restored by bringing in clean fill material to replace the excavated material.

Our Readiness Review is scheduled for July 6, 1995. Please provide an Archaeological Status Report for this year's work at your earliest convenience. If you have any questions, please contact me at 662-1320, MS M327.

cc: Project File M9579.2.1

ARCHAEOLOGICAL STATUS REPORT
FOR
ENVIRONMENTAL RESTORATION READINESS REVIEW

Date: June 6, 1994

OU: 1114 (TA-3, 59, 60, 61, 64)
OU PL: Garry Allen, CLS-6, MS E525

Work Completed to Date: Area indicated on the attached map (maps 1 & 2) has been surveyed for archaeological resources. The report is in draft form.

Outstanding Work for this Fiscal Year: Report completion and submittal to the State Historic Preservation Office (SHPO) for concurrence.

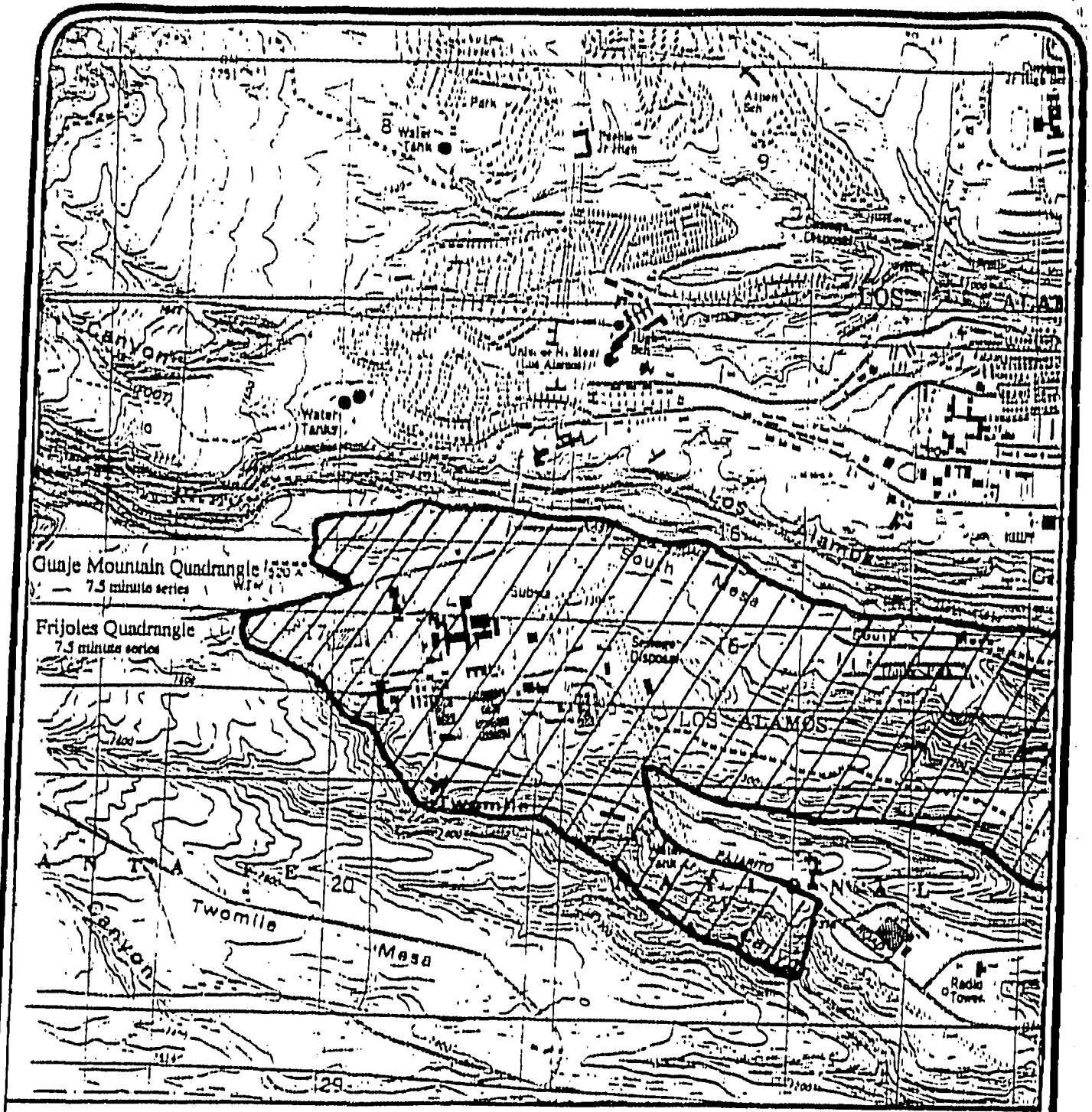
ER Activities to be Performed for this Readiness Review: All sampling locations are assumed to be within the surveyed area indicated on maps 1 and 2. If this is incorrect, or there are areas to be sampled which are outside this area please contact me at 665-6442.

Outstanding Issues for this Readiness Review: If you have any questions concerning archaeology within OU 1114 please contact me at 665-6442.

Avoidance Measures: Do not drive heavy equipment or other vehicles over the archaeological sites marked on the map (maps 3 & 4).

Michael A. Schillaci
Archaeology Project Director
ESH-8, MS M887, 5-6442

cc: Vicki Fry Field Team Leader ERM/Golder
Bev Larson Cultural Resource Management Team Leader, ESH-8, MS M887



SCALE 1:24 000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 0 1 KILOMETER

CONTOUR INTERVAL 20 FEET

ENVIRONMENTAL RESTORATION PROGRAM

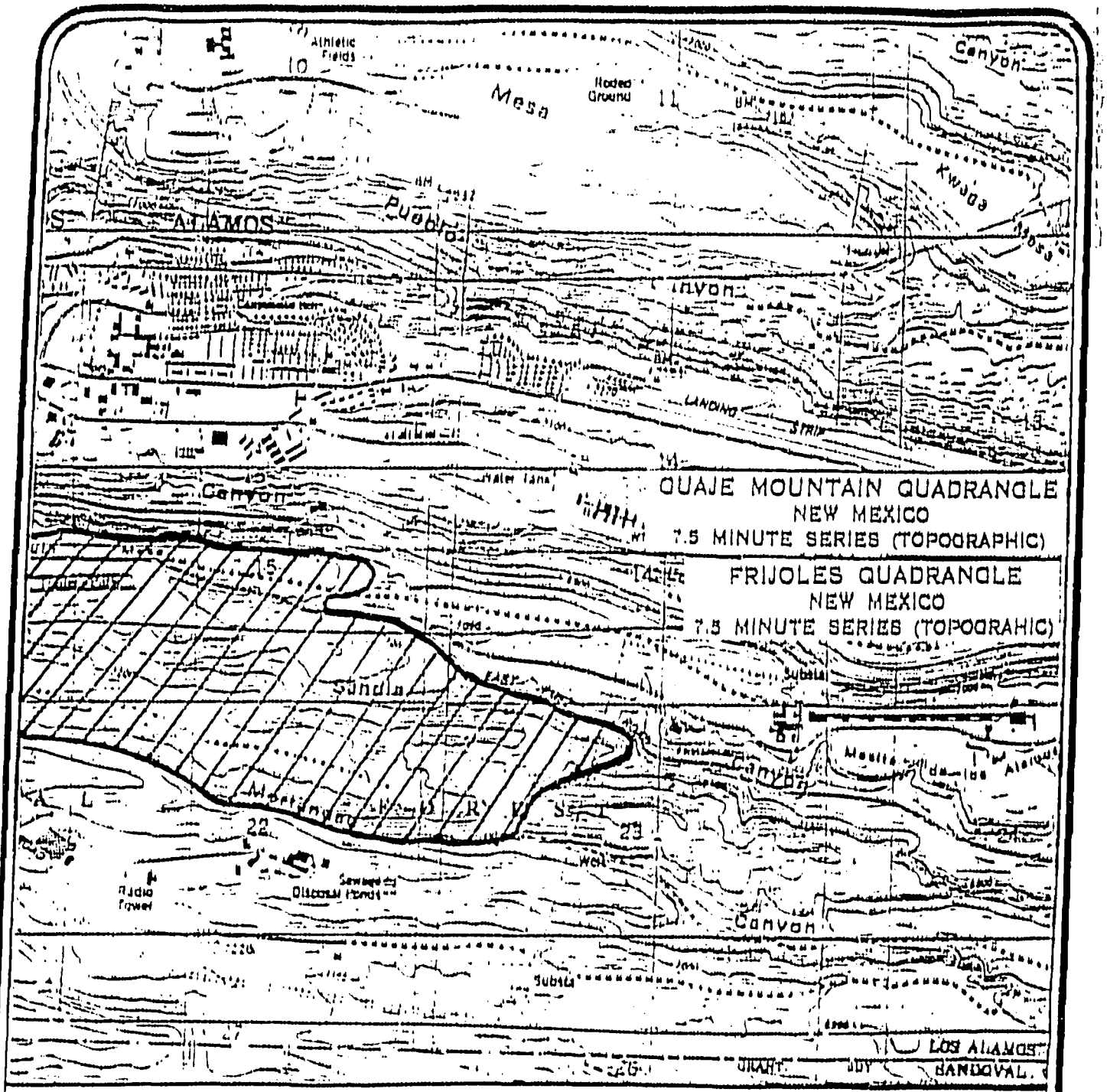
OU 1114

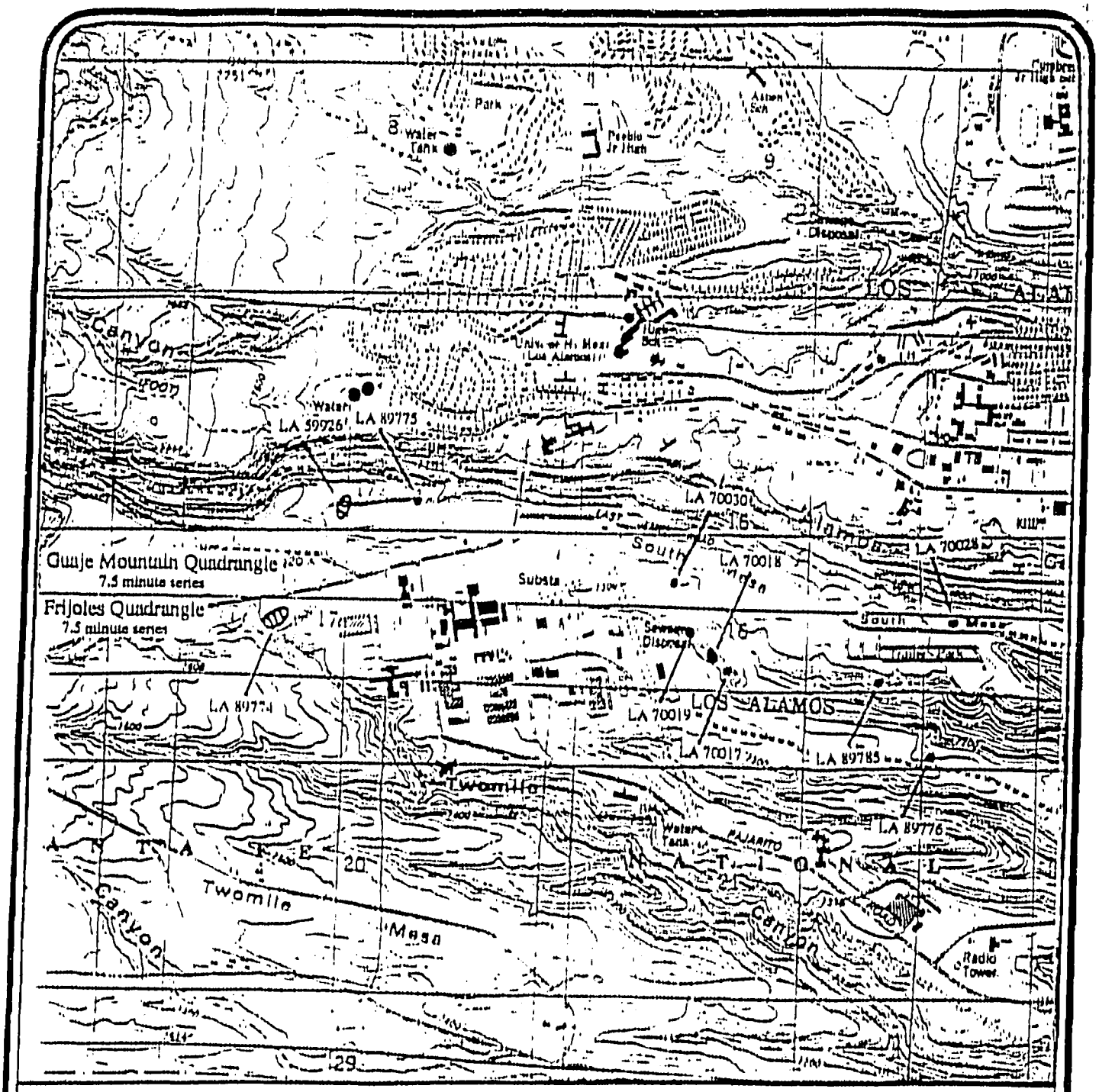
Map 1.

NEW MEXICO

QUADRANGLE LOCATION

SURVEY AREA

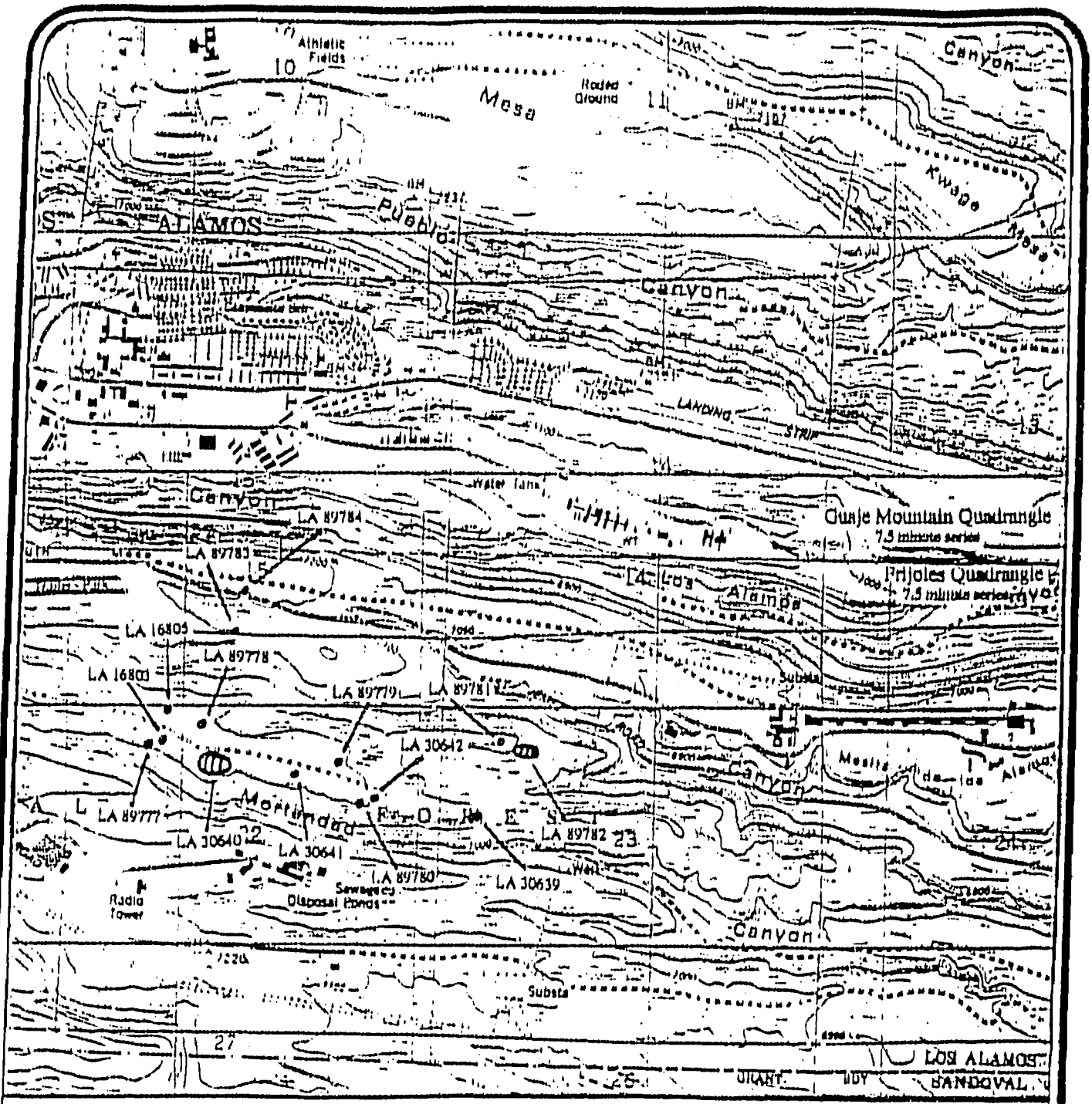

QUAJE MOUNTAIN QUADRANGLE
NEW MEXICO
7.5 MINUTE SERIES (TOPOGRAPHIC)
FRIJOLES QUADRANGLE
NEW MEXICO
7.5 MINUTE SERIES (TOPOGRAHIC)
SCALE 1:24 000
CONTOUR INTERVAL 20 FEET
ENVIRONMENTAL RESTORATION
PROGRAM
OU 1114
Map 2.
NEW MEXICO
QUADRANGLE LOCATION
SURVEY AREA



ENVIRONMENTAL RESTORATION PROGRAM

OU 1114

Map 3.



ENVIRONMENTAL RESTORATION PROGRAM

OU 1114

Map 4.

TA-3, SWMU 3-056(c) Expedited Cleanup Plan Summary

Detailed Description of SWMU 3-056(c)

SWMU 3-056(c) is an inactive storage area located on the north side of a Utilities Shop, TA-3-223. The SWMU extends along the length of TA-3-223, and is bounded by a fence to the north and TA-3-223 to the south. Included within the SWMU boundary is an area down slope from the storage area that drains to a tributary of Sandia Canyon. A small portion of this area was used as a storage area for electrical equipment. Items previously stored in this area include capacitors and transformers with PCB-containing dielectric fluids as well as unmarked drums that may have contained waste oils and solvents (LANL 1993, 1090).

Operational History

SWMU 3-056(c) was used as a storage area for electrical equipment, new and used dielectric fluids, and waste solvent from 1967 to approximately 1992. Solvents were used to clean electrical equipment; the types of cleaning solvents potentially used and stored at the site include an unknown solvent from 1967 to approximately 1981 and Viking R30 (trichloroethane - TCA) from 1981 to 1990. Since 1990, a non-hazardous citrus-based solvent has been used to clean electrical equipment. Transclene (tetrachloroethylene - PCE) may have been stored at the site as it was used by an electrical equipment maintenance subcontractor to retrofill transformers in the field. The subcontractor was responsible for the disposal of all waste materials from this activity; hence no wastes were returned to the SWMU 3-056(c) storage area. In 1991, approximately one to two feet of clean fill was placed on the site and surrounding area to correct drainage patterns. The SWMU 3-056(c) storage area was decommissioned in 1992 (LANL 1995, 3-1232).

Overview and Rationale

Phase I RFI sampling results indicate that PCBs exceeding cleanup levels exist in the surface soils on the north side of building TA-3-223, and the excavated soils will be classified as a TSCA-regulated waste. Excavation of PCB-contaminated soils at the site will be conducted to prevent the contaminants from spreading beyond the current location. This action will minimize the potential risk to human health and the environment. Verification samples will be collected to confirm that the PCBs have been removed and disposed of in accordance with the Expedited Cleanup (EC) plan.

Cleanup Activities

Prior to excavation, soil samples will be collected from approximately ten locations at the site to confirm 1) the areal extent of PCB contamination and 2) that the reported existence of low levels of PCE at depth do not pose an unacceptable risk to human health and the environment. Soil samples will be collected around the perimeter of the identified PCB contamination (atop the mesa and on the slope) as well as in the vicinity of two PCE detections. Samples will be collected from surface and near-surface soils (0- to 18-inch depth) for analysis of PCBs while samples will be collected from the soil/tuff interface for analysis of volatile organic compounds (VOCs), i.e., PCE. During sample collection, three headspace screening analyses will be conducted along the length of each sample core to confirm the presence or absence of VOCs. These samples will be field-analyzed in a mobile analytical laboratory using EPA Method (SW-846) 8080 for PCBs and EPA Method (SW-846) 8260 for VOCs, respectively. All analytical tests and reports will include EPA

Level 3 data. Any additionally identified PCB contamination will be marked for excavation. If VOCs are detected, additional samples will be collected and field-analyzed to determine nature, concentrations, and extent; those results will be evaluated to determine whether an unacceptable risk exists. Based on the RFI Phase I analytical results, the PCBs and PCE are not collocated; hence, the cleanup of PCB contamination will proceed as proposed in the EC Plan.

Based on the RFI Phase I analytical results, the PCB contamination exceeding the cleanup levels at this site extends to a maximum depth of 18 inches (both atop the mesa and on the slope). PCB-contaminated soil will be removed in the proposed cleanup area using a backhoe or shovels, as required by site conditions and as determined by the approved waste TSD subcontractor. The expected volume of PCB-contaminated soil to be excavated, transported, and land disposed is approximately 30 cubic yards. During excavation activities, samples from bulk soils will be collected and analyzed in accordance with the waste acceptance criteria (WAC) of the TSD subcontractor (to ensure waste is properly characterized). Initial verification samples will be collected on the nodes of a 5-ft. by 5-ft. grid within the excavated area; these samples will be submitted for on-site field laboratory analysis of PCBs and VOCs (by the methods described above). Additional soil will be excavated in 6-inch lifts where results indicate that PCB cleanup levels have not been met, until field laboratory analytical results indicate that any remaining PCB concentrations meet the cleanup criteria. Final verification samples will be collected and submitted for fixed laboratory analysis of PCBs and VOCs.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Mike Alexander, ESH-18, M497

From: Derek Faulk DF

Date: 16 June, 1995

Regarding: Septic System Permit for Field Unit 1 SWMU 3-056(c)

Attached is a summary of the remedial activities to be performed at SWMU 3-056(c) from August to September, 1995. The summary is provided for your review regarding a septic system permit review of the work site.

Our Readiness Review is scheduled for July 6, 1995. Please sign below and return at your earliest convience to me at MS M327 as acknowledgement that a Septic System Permit is not required.

If you have any questions, please feel free to contact me at 662-3700.

Mike Alexander — Date

cc: Project File M9579.2.1

TA-3, SWMU 3-056(c) Expedited Cleanup Plan Summary

Detailed Description of SWMU 3-056(c)

SWMU 3-056(c) is an inactive storage area located on the north side of a Utilities Shop, TA-3-223. The SWMU extends along the length of TA-3-223, and is bounded by a fence to the north and TA-3-223 to the south. Included within the SWMU boundary is an area down slope from the storage area that drains to a tributary of Sandia Canyon. A small portion of this area was used as a storage area for electrical equipment. Items previously stored in this area include capacitors and transformers with PCB-containing dielectric fluids as well as unmarked drums that may have contained waste oils and solvents (LANL 1993, 1090).

Operational History

SWMU 3-056(c) was used as a storage area for electrical equipment, new and used dielectric fluids, and waste solvent from 1967 to approximately 1992. Solvents were used to clean electrical equipment; the types of cleaning solvents potentially used and stored at the site include an unknown solvent from 1967 to approximately 1981 and Viking R30 (trichloroethane - TCA) from 1981 to 1990. Since 1990, a non-hazardous citrus-based solvent has been used to clean electrical equipment. Transclene (tetrachloroethylene - PCE) may have been stored at the site as it was used by an electrical equipment maintenance subcontractor to retrofill transformers in the field. The subcontractor was responsible for the disposal of all waste materials from this activity; hence no wastes were returned to the SWMU 3-056(c) storage area. In 1991, approximately one to two feet of clean fill was placed on the site and surrounding area to correct drainage patterns. The SWMU 3-056(c) storage area was decommissioned in 1992 (LANL 1995, 3-1232).

Overview and Rationale

Phase I RFI sampling results indicate that PCBs exceeding cleanup levels exist in the surface soils on the north side of building TA-3-223, and the excavated soils will be classified as a TSCA-regulated waste. Excavation of PCB-contaminated soils at the site will be conducted to prevent the contaminants from spreading beyond the current location. This action will minimize the potential risk to human health and the environment. Verification samples will be collected to confirm that the PCBs have been removed and disposed of in accordance with the Expedited Cleanup (EC) plan.

Cleanup Activities

Prior to excavation, soil samples will be collected from approximately ten locations at the site to confirm 1) the areal extent of PCB contamination and 2) that the reported existence of low levels of PCE at depth do not pose an unacceptable risk to human health and the environment. Soil samples will be collected around the perimeter of the identified PCB contamination (atop the mesa and on the slope) as well as in the vicinity of two PCE detections. Samples will be collected from surface and near-surface soils (0- to 18-inch depth) for analysis of PCBs while samples will be collected from the soil/tuff interface for analysis of volatile organic compounds (VOCs), i.e., PCE. During sample collection, three headspace screening analyses will be conducted along the length of each sample core to confirm the presence or absence of VOCs. These samples will be field-analyzed in a mobile analytical laboratory using EPA Method (SW-846) 8080 for PCBs and EPA Method (SW-846) 8260 for VOCs, respectively. All analytical tests and reports will include EPA

Level 3 data. Any additionally identified PCB contamination will be marked for excavation. If VOCs are detected, additional samples will be collected and field-analyzed to determine nature, concentrations, and extent; those results will be evaluated to determine whether an unacceptable risk exists. Based on the RFI Phase I analytical results, the PCBs and PCE are not collocated; hence, the cleanup of PCB contamination will proceed as proposed in the EC Plan.

Based on the RFI Phase I analytical results, the PCB contamination exceeding the cleanup levels at this site extends to a maximum depth of 18 inches (both atop the mesa and on the slope). PCB-contaminated soil will be removed in the proposed cleanup area using a backhoe or shovels, as required by site conditions and as determined by the approved waste TSD subcontractor. The expected volume of PCB-contaminated soil to be excavated, transported, and land disposed is approximately 30 cubic yards. During excavation activities, samples from bulk soils will be collected and analyzed in accordance with the waste acceptance criteria (WAC) of the TSD subcontractor (to ensure waste is properly characterized). Initial verification samples will be collected on the nodes of a 5-ft. by 5-ft. grid within the excavated area; these samples will be submitted for on-site field laboratory analysis of PCBs and VOCs (by the methods described above). Additional soil will be excavated in 6-inch lifts where results indicate that PCB cleanup levels have not been met, until field laboratory analytical results indicate that any remaining PCB concentrations meet the cleanup criteria. Final verification samples will be collected and submitted for fixed laboratory analysis of PCBs and VOCs.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Terry Foxx, ESH-20, M887

From: Derek Faulk DBF

Date: 19 June, 1995

Regarding: Endangered Species Issues and Wetlands/Floodplains Assessment

---

Attached is a summary of remedial activities to be performed at SWMU 3-056(c) from August to September, 1995. The summary is provided for your review regarding a Threatened and Endangered Species Assessment and Wetlands/Floodplain Assessment of the work site.

Our Readiness Review is scheduled for July 6, 1995. Please return a Biological Resource Evaluation or other comments at your earliest convenience. If you have any questions, please call me at 662-3700, MS 327.

cc: Project File M9579.2.1

TA-3, SWMU 3-056(c) Expedited Cleanup Plan Summary

Detailed Description of SWMU 3-056(c)

SWMU 3-056(c) is an inactive storage area located on the north side of a Utilities Shop, TA-3-223. The SWMU extends along the length of TA-3-223, and is bounded by a fence to the north and TA-3-223 to the south. Included within the SWMU boundary is an area down slope from the storage area that drains to a tributary of Sandia Canyon. A small portion of this area was used as a storage area for electrical equipment. Items previously stored in this area include capacitors and transformers with PCB-containing dielectric fluids as well as unmarked drums that may have contained waste oils and solvents (LANL 1993, 1090).

Operational History

SWMU 3-056(c) was used as a storage area for electrical equipment, new and used dielectric fluids, and waste solvent from 1967 to approximately 1992. Solvents were used to clean electrical equipment; the types of cleaning solvents potentially used and stored at the site include an unknown solvent from 1967 to approximately 1981 and Viking R30 (trichloroethane - TCA) from 1981 to 1990. Since 1990, a non-hazardous citrus-based solvent has been used to clean electrical equipment. Transclene (tetrachloroethylene - PCE) may have been stored at the site as it was used by an electrical equipment maintenance subcontractor to retrofill transformers in the field. The subcontractor was responsible for the disposal of all waste materials from this activity; hence no wastes were returned to the SWMU 3-056(c) storage area. In 1991, approximately one to two feet of clean fill was placed on the site and surrounding area to correct drainage patterns. The SWMU 3-056(c) storage area was decommissioned in 1992 (LANL 1995, 3-1232).

Overview and Rationale

Phase I RFI sampling results indicate that PCBs exceeding cleanup levels exist in the surface soils on the north side of building TA-3-223, and the excavated soils will be classified as a TSCA-regulated waste. Excavation of PCB-contaminated soils at the site will be conducted to prevent the contaminants from spreading beyond the current location. This action will minimize the potential risk to human health and the environment. Verification samples will be collected to confirm that the PCBs have been removed and disposed of in accordance with the Expedited Cleanup (EC) plan.

Cleanup Activities

Prior to excavation, soil samples will be collected from approximately ten locations at the site to confirm 1) the areal extent of PCB contamination and 2) that the reported existence of low levels of PCE at depth do not pose an unacceptable risk to human health and the environment. Soil samples will be collected around the perimeter of the identified PCB contamination (atop the mesa and on the slope) as well as in the vicinity of two PCE detections. Samples will be collected from surface and near-surface soils (0- to 18-inch depth) for analysis of PCBs while samples will be collected from the soil/tuff interface for analysis of volatile organic compounds (VOCs), i.e., PCE. During sample collection, three headspace screening analyses will be conducted along the length of each sample core to confirm the presence or absence of VOCs. These samples will be field-analyzed in a mobile analytical laboratory using EPA Method (SW-846) 8080 for PCBs and EPA Method (SW-846) 8260 for VOCs, respectively. All analytical tests and reports will include EPA

Level 3 data. Any additionally identified PCB contamination will be marked for excavation. If VOCs are detected, additional samples will be collected and field-analyzed to determine nature, concentrations, and extent; these results will be evaluated to determine whether an unacceptable risk exists. Based on the RFI Phase I analytical results, the PCBs and PCE are not collocated; hence, the cleanup of PCB contamination will proceed as proposed in the EC Plan.

Based on the RFI Phase I analytical results, the PCB contamination exceeding the cleanup levels at this site extends to a maximum depth of 18 inches (both atop the mesa and on the slope). PCB-contaminated soil will be removed in the proposed cleanup area using a backhoe or shovels, as required by site conditions and as determined by the approved waste TSD subcontractor. The expected volume of PCB-contaminated soil to be excavated, transported, and land disposed is approximately 30 cubic yards. During excavation activities, samples from bulk soils will be collected and analyzed in accordance with the waste acceptance criteria (WAC) of the TSD subcontractor (to ensure waste is properly characterized). Initial verification samples will be collected on the nodes of a 5-ft. by 5-ft. grid within the excavated area; these samples will be submitted for on-site field laboratory analysis of PCBs and VOCs (by the methods described above). Additional soil will be excavated in 6-inch lifts where results indicated that PCB cleanup levels have not been met, until field laboratory analytical results indicate that any remaining PCB concentrations meet the cleanup criteria. Final verification samples will be collected and submitted for fixed laboratory analysis of PCBs and VOCs.

ESH-17
AIR QUALITY GROUP

P.O. BOX 1663 MS J978
LOS ALAMOS NATIONAL LABORATORY
LOS ALAMOS, NM 87544
(505) 665-8855
FAX (505) 665-8858

DATE: 7/5/95

FROM: L. Mayer

TO: Mark Fenn FAX #: 662-1995

TO: _____ FAX #: _____

TO: _____ FAX #: _____

SUBJECT: _____

YOU SHOULD RECEIVE ( ) PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL (505) 665-8855.

COMMENTS:

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Doug Stavert, ESH-8

From: Derek Faulk

Date: 13 June 1995

Regarding: Airborne Radioactive Emissions Review for Permit
National Emission Standards for Hazardous Air Pollutants (NESHAP)

ERM/Golder will be conducting remedial activities for the LANL Environmental Restoration Project at the JCI Utilities Building in TA-3 in August, 1995. The activities include soil sampling for site characterization as well as excavation and removal of soils contaminated with polychlorinated biphenyls (PCBs). Approximately 30 cubic yards of PCB-contaminated soil are anticipated to be removed from an area adjacent to the utility building. Upon completion of remedial activities, the site will be restored by bringing in clean fill material to replace the contaminated material that will be removed.

There are no known radioactive concerns associated with this site. There are no planned releases of air pollutants associated with the work to be performed. Therefore, these activities should not be considered a NESHAP concern.

The readiness review for this project is scheduled for July 6, 1995. Therefore, please acknowledge your concurrence with this memo by signing it below and returning it to me at MS M327 at your earliest convenience. You may write any comments below. Please call me at 662-3700 if you have any questions.

Doug Stavert For Doug Stavert Date 7/5/95

cc: Project File M9579.2.1

Characterization activities have been excluded from review by the Laboratory because emission quantification of these operations cannot be done. The removal of the PCB contaminated soil will not cause 10 lb/hr or 25 tons/yr of HAPs em. to the atmosphere and therefore will not require ADEC 702 permitting.

ERM/Golder Los Alamos Project Team

LOS ALAMOS NATIONAL LABORATORY

ENVIRONMENTAL SAFETY & HEALTH (ESH-20)

ENVIRONMENTAL RESOURCE ASSESSMENTS

FAX TRANSMITTAL SHEET

FAX #: (505) 667-0731 **VERIFICATION #: (505) 667-0730**

DATE: 7/11/95 **ID #** ____ **LOG NO: EARE:95-FAX-** 1079

FROM: Saul Cross **PHONE #:** (___) _____

TO: Derek Faulk **FAX #:** (___) 662-1398 **VERIFY PHONE #** (___) _____

GRP/ORG: _____

TO: _____ **FAX #:** (___) _____ **VERIFY PHONE #** (___) _____

GRP/ORG: _____

TO: _____ **FAX #:** (___) _____ **VERIFY PHONE #** (___) _____

GRP/ORG: _____

MESSAGE: _____

_____

_____

_____

_____

NUMBER OF PAGES TO FOLLOW: _____

Cy: ESH-20 Fax File

To: Derek Faulk, ERM/Golder
From: Saul Cross, ESH-20
Subject: **Proposed remediation at SWMU 3-056(c)**

The following is a brief discussion of threatened and endangered species (TES) issues and wetlands concerns associated with the proposed remediation of PCB-contaminated soils at Solid Waste Management Unit (SWMU) 3-056(c). Impacts and mitigations that must be followed are included. Please call me at 665-1270 if you require clarification or have any questions.

INTRODUCTION

SWMU 3-056(c) is an inactive storage area bordering upper Sandia Canyon. The area was used to store electrical equipment, dielectric fluids, and waste solvents from 1967 to approximately 1992. A portion of the SWMU was used to store electrical equipment, including machinery with PCB dielectric fluids, and unmarked drums possibly containing waste oils and solvents. PCE, a volatile organic compound (VOC), may have been stored at the site.

Phase 1 RFI sampling indicated that PCBs are present in the surface soils on the north side of Building TA-3-223. The PCB contamination exceeding cleanup levels extends to a maximum depth of 18 inches according to RFI Phase 1 analytical results. Soil samples have been collected to determine the extent of the contamination.

The PCB-contaminated soils will be excavated to prevent further contaminant spread, thus minimizing the risks to human health. Contaminated soils will be removed with a backhoe or shovels, and the excavated soils will be classified as a TSCA-regulated waste. The expected volume of PCB-contaminated soils to be removed is approximately 30 cubic yards. Soil will be removed in 6-inch lifts and tested to assess contaminant levels. Final verification samples will be collected and submitted for fixed laboratory analysis of PCBs and VOCs.

On 6 July 1995, Clint Daymon of ER/Golder showed the site to members of ESH-20's Ecological Studies Team (EST). In particular, EST was asked to assess the proposed cleanup for TES issues and wetlands/floodplain concerns. This information is necessary to comply with the Endangered Species Act of 1973, the New Mexico Wildlife Conservation Act, the New Mexico Endangered Plant Species Act, federal Executive Orders 11990 ("Protection of Wetlands") and 11988 ("Floodplain Management"), Code of Federal Regulations 10 CFR 1022, and Department of Energy Order 5400.1.

AFFECTED ENVIRONMENT

Vegetation and wildlife

The proposed project will occur in a small area, which has been highly-disturbed in the past. Both the small size and the previous disturbance obviate concerns for the immediate

environment on the level mesa area. A rodent hole exists in the highly contaminated zone on the mesa, and this animal(s) may have significant levels of contamination. A Douglas-fir (*Pseudotsuga menziesii*) and a Russian olive (*Elaeagnus angustifolia*) occur in the level contamination zone. There is little understory, primarily orchard grass (*Dactylis glomerata*).

The downslope contamination occurs in small drainages that directly feed into the Sandia Canyon watercourse. This steep slope has a very open shrub layer of Gambel's oak (*Quercus gambelii*), small Ponderosa pine (*Pinus ponderosa*), small aspen (*Populus tremuloides*), wax currant (*Ribes cereum*), and cliffbush (*Jamesia americana*) and an understory of grasses and forbs. The slope is also littered with rubble and trash. To the east, the exposed insulation of two parallel pipes is sloughing off.

Threatened and endangered species

The Biological Evaluation for Environmental Restoration Program Operable Unit 1114 report (Cross 1994, LA-UR-94-21) lists the following T&E species as having a medium potential for occurrence within OU 1114:

Checker lily (*Fritillaria atropurpurea*)
Wood lily (*Lilium philadelphicum* var. *andinum*)
Northern goshawk (*Accipiter gentilis*)
Common black hawk (*Buteogallus anthracinus*)
Willow flycatcher (*Empidonax traillii*)
Spotted bat (*Euderma maculatum*)
Peregrine falcon (*Falco peregrinus*)
Jemez Mountains salamander (*Plethodon neomexicanus*)
Meadow jumping mouse (*Zapus hudsonius*)

The project area does not contain suitable habitat for any of these species. Initially, EST was concerned that suitable habitat for the Jemez Mountains salamander could be affected by the proposed soil removal. However, the slope is too dry to support them and does not contain downed logs, which shelter the salamanders.

Floodplains/Wetlands

EST's chief concern is that contaminated soils will migrate downslope, spreading the PCBs and possibly entering the stream channel. If this occurs, the contaminants would be quickly carried downstream and into the Sandia Wetlands. Careful planning and attention to detail are required to ensure that this does not happen.

IMPACTS

Any movement of contaminants downslope from the contaminated area could result in increased cleanup costs and possible stream contamination. Such downslope movement could be caused by

- the use of heavy equipment (as a backhoe) near the mesa edge
- failure to adequately contain contaminated soils near the mesa edge while soil lifts are still occurring

- removal of the large Douglas-fir tree at the edge of the mesa
- failure to contain runoff water, which may pass through the project area

MITIGATIONS

The following mitigation measures must be followed to prevent erosion and the spread of contaminated soils:

- Soil removal near the large Douglas-fir, near the mesa edge, and downslope from the mesa should be done with shovels or other hand tools.
- The Douglas-fir tree should be left in place although the Russian olive may be removed.
- Silt fences and hay bales should be properly installed to prohibit the movement of contaminated soils downslope.
- Runoff water should be routed around the project area.
- Once soil removal has been completed, the area should be restored to its previous contours and revegetated. It may be necessary to spray a polymer on the affected area to stabilize the soils until new growth appears. EST can provide appropriate seed lists for the revegetation.

It is strongly recommended that electrical equipment and other possible sources of contaminants be stored away from mesa edges and downslope areas. Heavy storm events must be considered when storage areas are inspected. At present, an area adjacent to SWMU 3-056(c) continues to store electrical equipment near the mesa edge.

Los Alamos

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

memorandum

TO: Lynda Sobojinski, CST-18, E525 DATE: June 16, 1995

FROM: Jacie Slino, ESH-20 MP for JS MAIL STOP/TELEPHONE: M887/5-5716

SYMBOL: ESH-20/EARE-95-0954

SUBJECT: NEPA Categorical Exclusion for *Field Unit # 1 - Voluntary Corrective Action at TA-3*

ESH-20 ACCESSION NO.: 5966
ES&H ID NO.: 95-0072

The Department of Energy has reviewed the DOE Environmental Checklist (DEC) for *Environmental Restoration's 1995 Accelerated Cleanup Process* and has categorically excluded it from the requirement to prepare further National Environmental Policy Act (NEPA) documentation. Since your project is covered within this umbrella DEC, you can carry out the activities as described in the DEC as soon as all other regulatory requirements have been met.

If you have a question about your project's compliance with environmental, safety, or health requirements, consult with the specialists identified during the ESH-1D process or with me. If you make changes to your project so that the DEC is no longer accurate, please call me so we can reevaluate the NEPA documentation.

JS:jm/rm

Enclosure:: DOE Letter

Cy: G. Allen, CST-18, MS E525
G. Barnes, ESH-3, MS K479

United States Government

memorandum

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

DATE: JUN 1 2 1995
REPLY TO ATTN OF: LAAMEP:5EW-031
SUBJECT: National Environmental Policy Act Categorical Exclusion Determinations

TO: Teralene Foxx, ESH-20, LANL, MS-M887

Attached is a listing of proposed actions which have been reviewed by the Los Alamos Area Office in accordance with DOE National Environmental Policy Act (NEPA) 10 CFR Section 1021 Appendix B to Subpart D Regulations. Based on my staff's review and analysis, I have determined that these actions are categorically excluded from the requirement to prepare NEPA documentation in the form of either an Environmental Assessment or an Environmental Impact Statement.

Questions may be referred to Elizabeth Withers, Acting NEPA Compliance Officer, Office of Environment and Projects, at 667-8690.

Larry Kirkman, P.E.
Acting Area Manager

Attachment

cc w/attachment:
W. Mullen, AAMFO, LAAO
E. Withers, AAMEP, LAAO
T. Taylor, AAMEP, LAAO

cc w/copies of DECs and attached lists:
A. Ladino, Scientech, LAAO
H. Otway, Dir-SIO, LANL, MS-A117
T. Ribe, Los Alamos Reading Room, LANL, MS-C314
J. Robbins, EPD, AL

RECEIVED ESH-20 JUN 1 4 1995
ROUTE: GRPMGMT: TLs
COPY: GRPMGMT: TLs
RETURN TO: GRPOPC
ORIGINAL: Teri Foxx
NOTE:

NATIONAL ENVIRONMENTAL POLICY ACT

CATEGORICAL EXCLUSION LIST

DEPARTMENT OF ENERGY

LOS ALAMOS AREA OFFICE

May 23, 1995

Project Activity File	LAAO Tracking No.	Applicable Cat. Ex. No.
EM		
Environmental Restoration..	LAN-95-098	B.6.1

ARCHAEOLOGICAL STATUS REPORT
FOR
ENVIRONMENTAL RESTORATION READINESS REVIEW
DATE: JULY 6, 1995

OU: 1114 (TA-3, 59, 60, 61, 64)
OU PL: Garry Allen, CLS-6, MS E525

Work Completed to Date: Areas surveyed for this OU are the same as those attached to an Archaeological Status Report submitted for this OU dated June 6, 1994. A report for this OU was submitted to the State Historic Preservation Officer (SHPO) by a memo from the DOE dated June 21, 1995. Concurrence in a determination of no effect for site characterization of OU 1114 is expected this month.

Outstanding Work for this Fiscal Year: Monitoring of areas near cultural resources, as needed.

ER Activities to be Performed for this Readiness Review: Expedited cleanup of SWMU 3-056(c) as described in memo from Derek Faulk (ERM/Golder) to Bev Larson (LANL ESH-20) dated June 16, 1995.

Outstanding Issues for this Readiness Review: No archaeological sites are located in the area to be impacted by clean-up of SWMU 3-056(c).

Beverly M. Larson
Cultural Resource Team Leader
LANL ESH-20, MS M887
667-2276

cc: Derek Faulk, ERM/Golder

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Doug Stavert, ESH-8

From: Derek Faulk DF

Date: 13 June 1995

Regarding: Airborne Radioactive Emissions Review for Permit
National Emission Standards for Hazardous Air Pollutants (NESHAP)

ERM/Golder will be conducting remedial activities for the LANL Environmental Restoration Project at the JCI Utilities Building in TA-3 in August, 1995. The activities include soil sampling for site characterization as well as excavation and removal of soils contaminated with polychlorinated biphenyls (PCBs). Approximately 30 cubic yards of PCB-contaminated soil are anticipated to be removed from an area adjacent to the utility building. Upon completion of remedial activities, the site will be restored by bringing in clean fill material to replace the contaminated material that will be removed.

There are no known radioactive concerns associated with this site. There are no planned releases of air pollutants associated with the work to be performed. Therefore, these activities should not be considered a NESHAP concern.

The readiness review for this project is scheduled for July 6, 1995. Therefore, please acknowledge your concurrence with this memo by signing it below and returning it to me at MS M327 at your earliest convenience. You may write any comments below. Please call me at 662-3700 if you have any questions.

Doug Stavert Date

cc: Project File M9579.2.1

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 16 June, 1995

Regarding: Utilities Required for Field Activities Obtained

It has been determined that no additional utilities will be required for the Field Unit 1, SWMU 3-056(c) work site. All needed utility services are presently in place.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 20 June, 1995

Regarding: Surface Access

Although the work to be performed at SWMU 3-056(a) is behind a fence at the JCI Utilities yard, a key will not be required to gain access to the site. If it is found that a key will be required to gain access, one will be obtained from Jim Speight, JCI Utilities Supervisor.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 20 June, 1995

Regarding: Utilities Located and Marked

All utilities will be identified as part of the approval process for the excavation permit.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 20 June, 1995

Regarding: Utility Notification and Location

All utilities will be identified as part of the approval process for the excavation permit.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project Files M9579.2.1

From: Derek Faulk DF

Date: 13 June, 1995

Regarding: Communications

Two mobile telephones are reserved for expedited cleanup field work activities that will be performed at Field Unit 1, SWMU 3-056(c). No laboratory or HS radios are anticipated to be used. Other laboratory cellular telephones may be used while field operations are on-going by ESH-5, JCI, or other laboratory personnel who may be on-site during different times.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk

Date: 13 June, 1995

Regarding: Site Control and Security

LANL Environmental Restoration Project work will be performed by ERM/Golder at SWMU 3-056(c) during the fall of 1995. The work will be conducted in an area adjacent to the JCI Utilities Building, which itself is located behind a fence with locking gate. Work will include the excavation and removal of soil contaminated with polychlorinated biphenyls from an area on the mesa top approximately 30 feet by 30 feet in size. Additional soil may also be removed from the mesa slope. Site control and security will be maintained by establishing appropriate work zones using caution tape and appropriate postings. Excavated soil will be loaded into roll-off bins or other closed-topped storage containers.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 15 June, 1995

Regarding: Fax Machine Use for MAT-2 Manifests

All faxes will be transmitted and received from the ERM/Golder office located at 555 Oppenheimer Drive, Suite 100, Los Alamos. The Fax number is 662-1398.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Joe Louck, ESH-5 Field Unit 1 Representative

From: Derek Faulk DF

Date: 15 June, 1995

Regarding: ESH-5 Notification of Environmental Restoration Activities

---

This memo serves as formal notice to you that, as the ESH Field Unit 1 Representative, ERM/Golder, on behalf of the Los Alamos National Laboratory Environmental Restoration Project, will be conducting an Expedited Cleanup in Field Unit 1, SWMU 3-056(c) from August 1995 through the end of September 1995. These activities include geodetic surveying, surface soil sampling, and soil excavating.

The readiness review for the pending field work is scheduled for July 6, 1995. The field work itself is scheduled for the first of August 1995.

cc: Project File M9579.2.1

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 22 June, 1995

Regarding: Laboratory Divisions That Control Area of Work

The laboratory division that controls the site for the expedited cleanup at SWMU 3-056(c) is JCI utilities. On May 17, 1995, Valerie Rhodes(ERM/Golder) and I met with Mr. Jim Speight, JCI Lineman Supervisor, at the site to discuss the upcoming expedited cleanup work and the site history. During the week of June 12-16, Ms. Lynda Sobojinski(Deputy FPL), also met with Mr. Speight to inform him of upcoming site activities.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 22 June, 1995

Regarding: Radiation Screening of Samples

Because radiation was not detected at SWMU 3-056(a) during screening of RFI samples and the SWMU is not a known radiological site, samples collected as part of the expedited cleanup will not be screened for radiation by the Mobile Radiological Analytical Laboratory, or rad van.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk

Date: 13 June, 1995

Regarding: Forms Associated with ER Program SOPs

Chain of Custody Forms, Sample Collection Logs, Master Collection Logs, Sample Labels, Unique Sample ID Numbers, and other similar sampling forms will be generated by Nathan Mc Cranie, Field Unit 1 Data Manager, using the 4th Dimension Database. Logbooks will be maintained by the FTL and SSO.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 6 July 1995

Re: Work Request for SWMU 3-056(c) Expedited Cleanup

On Monday, 22 May 1995, I met with Henry Nunes, FSS-6, at the SWMU 3-056(c) work site to discuss site preparation and site restoration needs in conjunction with the expedited cleanup activities. Henry inspected the fence that would have to be removed prior to the start of remedial activities as well as replaced after the work is completed. We also discussed the need for bringing in fill material, grass seed, and shrubbery to restore the site after the completion of remedial activities. At that time, I also asked Henry to provide us with a cost estimate to perform the work.

On Friday, 16 June 1995, I met with Henry again to discuss the site preparation and site restoration work at SWMU 3-056(c). He suggested using JCI for the work instead of a BOA contractor and also stated that he would initiate a work order and a Project Identifier Number to provide us with a cost estimate.

To date, a copy of the cost estimate has not been sent to me. I will pursue the issue with Henry, Chris Loggains, or Armando Armendariz, who are both supporting Henry.

cc: Henry Nunes
Garry Allen
Lynda Sobojinski
John Williams
Al Funk

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 16 June, 1995

Regarding: Sanitation Facilities

During site remediation activities at SWMU 3-056(a), sanitation facilities will be located on-site.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk

Date: 15 June, 1995

Regarding: Community Relations Notification of Environmental Restoration Activities

---

All work to be performed in conjunction with the SWMU 3-056(c) Expedited Cleanup will be performed on DOE property. Therefore, the LANL Stakeholders Office was not notified nor are community relations services anticipated for this project. If community relations services are found to be needed because the work is being performed as an expedited cleanup, the services will be arranged for by the ER Project office.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project Files M9579.2.1

From: Derek Faulk DF

Date: 13 June, 1995

Regarding: FIMAD Site ID Numbers

Site ID numbers from FIMAD will be obtained by Nathan Mc Cranie, Field Unit 1 Data Manager, and generated from the Field Unit 1 4th Dimension Database.

Maps will be obtained from FIMAD, Andrea Kron (Cartography), and the OU 1114 Summer Field Summary Report.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 16 June, 1995

Regarding: SOPs In Place

During site remediation activities in Field Unit 1, TA-3, SWMU 3-056(c) controlled copies of Los Alamos National Laboratory Standard Operating Procedures (SOPs), Administrative Requirements, Administrative Procedures, and the Quality Assurance project Plan will be maintained on-site at all times.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 20 June, 1995

Regarding: Scheduling of the Chem Van and Rad Van

To date, no mobile analytical laboratories have been scheduled for the expedited cleanup at SWMU 3-056(c). No radiological analytical laboratory will be required. A mobile chemical analytical laboratory will be scheduled from CST-12, ERM/Golder, Rollins Environmental, or Chem Waste Management.

MEMORANDUM

ER M/GOLDER Los Alamos Project Team

To: Project Files M9579.2.1

From: Derek Faulk DF

Date: 15 June, 1995

Regarding: Transportation of Hazardous Samples

Regarding LANL-ER-SOP-01.03, "Handling, Packaging and Shipping of Samples", we interpret the procedure as being applicable only to the final shipment of samples to commercial laboratories. We are not interpreting this SOP as being applicable to the movement of samples from field sites to the rad van, chem van, or to the Sample Management Office at TA-35.

During the course of Expedited Cleanup activities at SWMU 3-056(c), sample coolers will be picked up daily from TA-35 by the field team. The coolers will contain "Blue Ice" provided by CST-3, along with trip blanks, if applicable. The coolers will be carried to field sites for collection of samples throughout the work day. Samples will be carefully placed in coolers to avoid breakage and will be hand-carried to an on-site chem van by a member of the field team. The coolers will not be lined or filled with vermiculite, nor will the sample bottles be wrapped with "bubble wrapping". Per an interpretation of DOT regulations by Steve Bell, BUS-6, the samples are considered "dirt" and, therefore, the coolers do not require labeling, placarding, or shipping papers. An exception to this statement would be samples with known, high levels of specific types of contaminants.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 16 June, 1995

Regarding: Surv-Tek, Inc. Health and Safety Plan

The LANL contract surveyors, Surv-Tek, Inc. of Albuquerque, New Mexico, operate under the SSHASPs of the ER Program consulting firms, including ERM/Golder, and do not submit a SSHASP of their own. As currently scheduled, Surv-Tek will provide surveying services for remedial activities at Field Unit 1, SWMU 3-056(c).

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 5 July, 1995

Regarding: Subcontractor Health and Safety Plan Approved.

The remediation subcontractor will work under the ERM/Golder SSHASP, and will not submit a SSHASP of their own. Currently, ERM/Golder understands that Rollins Chem Pak will be the remediation subcontractor for remediation activities at SWMU 3-056(c).

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9570.2.1

From: Derek Faulk DF

Date: 22 June, 1995

Regarding: Trained Waste Coordinator

Ron Biegen will serve as the waste coordinator for the work associated with the expedited cleanup to be performed at SWMU 3-056(c). His training includes 40-hour HAZWOPER, 8-hour annual refresher HAZWOPER, 8-hour supervisor training, waste generator overview, and RCRA personal training.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 5 July, 1995

Regarding: Waste Minimization Implemented

Waste minimization at SWMU 3-056(c) will be implemented according to LANL AR 10.0-8 and stressed at daily health and safety tailgate meetings.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 16 June, 1995

Regarding: Resource Conservation and Recovery Act Review for Hazardous Waste

---

Resource Conservation and Recovery Act (RCRA) review for hazardous waste will be performed as specified in and in accordance with the approved Waste Characterization Strategy.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 16 June, 1995

Regarding: Occupational Radiological Hazard Assessment

The Occupational Radiological Hazard Assessment is included as part of the approved Site Specific Health and Safety Plan for SWMU 3-056(c).

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Diane Wilson, Los Alamos Medical Center

From: Derek Faulk

Date: 15 June, 1995

Regarding: Hospital Notification of Environmental Restoration Activities

---

This memorandum serves as notification of Expedited Cleanup activities to be conducted at TA-3 by ERM/Golder on behalf of the LANL Environmental Restoration Project. The work will involve the excavation of soil contaminated with polychlorinated biphenyl's. Chemicals that may be present at the site include gasoline, diesel fuel, hydraulic oil, motor oil, acids, and methanol.

cc: Project File M9579.2.1

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Mr. Douglas MacDonald, Los Alamos Fire Department

From: Derek Faulk DF

Date: 15 June, 1995

Regarding: Los Alamos Fire Department Notification of Environmental Restoration Activities

---

This memo serves as notice that ERM/Golder, on behalf of the Los Alamos National Laboratory Environmental Restoration Program, will be conducting Expedited Cleanup activities in Field Unit 1, TA-3, in August 1995. The site is located near the LANL Power Plant off of Diamond Drive. These activities include geodetic surveying, surface soil sampling, and excavation of contaminated soil. Heavy equipment, such as a front loader or backhoe, will be used on-site.

cc: Project File M9579.2.1

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Ms. Nina Laird, Los Alamos Police Department

From: Derek Faulk DF

Date: 16 June, 1995

Regarding: Los Alamos Police Department Notification of Environmental Restoration Activities

---

This memo serves as notice that ERM/Golder, on behalf of the Los Alamos National Laboratory Environmental Restoration Program, will be conducting an Expedited Cleanup in Field Unit 1, TA-3, from August 1995 through the end of September 1995. The site is located behind the LANL Power Plant off of Diamond Drive. These activities include geodetic surveying, surface soil sampling, and soil excavation. If you have any questions, feel free to call me at 662-3700.

cc: Project File M9579.2.1

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 16 June, 1995

Regarding: Notification of non-DOE Property Owners

Because all work associated with the expedited cleanup at SWMU 3-056(a) will be conducted on DOE property, there are no non-DOE property owners to be notified.

Los Alamos

Los Alamos National Laboratory
Los Alamos, New Mexico 87545

memorandum

TO	Derek Faulk, ERM/Golder, MS M327	DATE	August 18, 1995
FROM	Timothy Haarmann, ESH-20	MAIL STOP/TELEPHONE	M887/7-5019
SYMBOL	ESH-20/EARE-95-1126		
SUBJECT	CHANGE IN MITIGATION MEASURES AT SWMU 3-056(c)		

The intent of this memo is to document our phone conversation on 8-16-95. The original mitigation measures at SWMU 3-056(c) called for the Douglas-fir (*Pseudotsuga menziesii*) to be "left in place." However, due to some minor changes in the work to be done, you informed me that the Douglas-fir may have to be removed. If it is absolutely necessary, you may remove the Douglas-fir.

My concern is that the removal of the tree may aid in the erosion process. Therefore, it is crucial that you follow the original mitigation measures provided by Saul Cross.

These include the following:

- Silt fences and hay bales should be properly installed to prohibit the movement of contaminated soils downslope.
- Runoff water should be routed around the project area.
- Once soil removal has been completed, the area should be restored to its previous contours and revegetated.

If you have any questions, feel free to contact me at 667-5019.

TH:dr

Cy: ESH-20 Reading file

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 13 June, 1995

Regarding: Johnson Controls, Inc. Health and Safety Plan

JCI will operate under their own SSHASP and provide their own Site Safety Officer to complete site restoration tasks at Field Unit 1, SWMU 3-056(c)

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 22 June, 1995

Regarding: Access Agreement In Place

Because all work associated with the expedited cleanup at SWMU 3-056(a) will be conducted on DOE property, no access agreement will be necessary.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 22 June, 1995

Regarding: Arrangements for Waste Testing and Disposal

Waste testing and disposal will be conducted in accordance with the approved Waste Characterization Strategy for the work associated with the expedited cleanup to be performed at SWMU 3-056(c).

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 21 June, 1995

Regarding: On site Waste Storage Areas

In accordance with the approved Waste Characterization Strategy, a registered <90-day storage area is not required for the work associated with the expedited cleanup to be performed at SWMU 3-056(c) because no RCRA hazardous waste will be generated. A temporary waste storage area will be established on-site.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk DF

Date: 13 June, 1995

Regarding: Confined Space Permit (CSP)
Lockout/Tagout Permit (LTP)
Special Work Permit (SWP)
Radiation Work Permit (RWP)

The above-referenced permits are not applicable to the anticipated Expedited Cleanup field activities that will be performed at Field Unit 1, SWMU 3-056(a). The work to be performed will not require confined space entry, putting equipment out of service that will involve lockout/tagout procedures, or any work requiring a SWP. Radiation thresholds in which an RWP may be required are addressed in the Site-Specific Health and Safety Plan.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Mike Alexander, ESH-18
Alex Puglisi, ESH-18

From: Derek Faulk DF

Date: 28 June, 1995

Regarding: NPDES and WQCC Review

Attached is our Expedited Cleanup Summary for field remediation activities to be performed at TA-3 SWMU 3-056(c) during the summer of 1995. The summary is provided for your review regarding NPDES and WQCC requirements for our readiness review.

Decontamination water will be generated as a result of the remedial activities. The water will be sampled and analyzed by an on-site mobile chemical laboratory for polychlorinated biphenyls and volatile organic compounds. If analytical results show that the water is not contaminated, it will be discharged on-site.

Discharge of the decontamination water is addressed in a Storm Water Pollution Prevention Plan (SWPPP) being prepared for this project. The SWPPP is a requirement for the NPDES general permit. By addressing the discharge as a non-storm water discharge in the SWPPP, a notice of intent to discharge is not required

Our Readiness Review is scheduled for July 6, 1995. Please return your comments by writing them on the bottom of this memo and returning them to me at MS M327. Please call me at 662-3700 if you have any questions.

Mike Alexander Date

Alex Puglisi Date

cc: Project File M9579.2.1

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: Project File M9579.2.1

From: Derek Faulk

Date: 28 June, 1995

Regarding: TA-3 ESH-5 Representative Notification of Environmental Restoration Activities

---

The JCI Safety Office will act as the Facility Operations Safety Personnel contact for the expedited cleanup at SWMU 3-056(c) during the summer of 1995. The office can be contacted at 667-5771.

MEMORANDUM

ERM/GOLDER Los Alamos Project Team

To: John Miglio, Sample Management Office

From: Derek Faulk DF

Date: 16 June, 1995

Regarding: Sample Management Office Notification of Sampling Activities

---

This memo serves as notice that ERM/Golder will be performing an Expedited Cleanup of SWMU 3-056(c) for the LANL Environmental Restoration Project. The site is located adjacent to the JCI Utilities Building in TA-3. Samples will be submitted to a mobile chemical laboratory for analysis of polychlorinated biphenyls (PCBs) using EPA Method 8080 and Tetrachloroethylene (PCE) using EPA Method 8260. Approximately 60 samples will be collected for PCB analyses and approximately 60 samples will be collected for PCE analyses. This includes up to 10 confirmation samples to be collected for PCB analyses by a fixed laboratory. This number of samples includes duplicates, rinsate blanks and contingency samples. No Field Blank samples or Matrix Spike samples will be submitted.

The field effort may require the collection of additional samples. Should this occur, the Field Team Leader will notify the Sample Management Office (SMO) with a list of the additional samples and analysis required.

Sample containers will need to be picked up from the SMO during the middle of July. Coolers and Blue Ice will need to be picked up at the SMO on a daily Basis when field work begins.

cc: Nathan Mc Cranie
Project File M9579.2.1

LOS ALAMOS
NATIONAL LABORATORY

SPECIAL WORK PERMIT FOR SPARK-/FLAME-PRODUCING OPERATIONS

(See instructions on back)

THIS SECTION COMPLETED BY OPERATOR'S SUPERVISOR

Request Date	Starting Date	Expiration Date*	Project Identification Number	Work Order Number
10/3/95	10/3/95	10-5-95	LNO 5411	

Operator's Supervisor	Telephone Number	Mail Stop	Organization
Mark Powell	7-3751	A-199	SCI

Work Location	Technical Area	Building	Room	Other	Building Construction
	3	223	n/a		☐ Combustible ☐ Noncombustible ☑ N/A

Description of work to be performed and equipment to be used

Cut steel plate to proper dimensions and weld in front of trash... [illegible]

WORK STATEMENTS

Firewatcher Statement
I have performed the firewatcher's prestart-up activities specified in AR 8-4. I will remain in the area throughout the operation and at least 30 minutes after the work is finished to make sure that no fires have started.

Signature: [illegible signature] Date: 10/4/95

Operator Statement
I have performed the operator's prestart-up activities specified in AR 8-4, and I will not begin the operation until the SWP has been posted at the work site.

Signature: Date:

Operator's Supervisor Statement
I have performed the supervisor's prestart-up activities specified in AR 8-4, have verified the information presented above, and am submitting this form to the ENG area coordinator for approval.

Signature: Mark Powell Date: 10/4/95

THIS SECTION COMPLETED BY ENG-5 AREA COORDINATOR/CONSTRUCTION INSPECTOR

SYSTEMS CHECK LIST

NOTE: IF ANY OF THE FOLLOWING SYSTEMS NEED TO BE TAKEN OUT OF SERVICE, CONTACT THE EMERGENCY MANAGEMENT AND RESPONSE/FIRE PROTECTION (ENG-8) BEFORE TAKING ACTION.

☐ Work in Filter Plenums
☐ Automatic Sprinkler System
☐ Other Automatic Extinguishing Systems
☐ Heat Detectors
☐ Smoke Detectors

Special requirements needed (*Please describe*)

No Special Requirements [initials]

APPROVALS

NOTE: THIS PERMIT IS NOT VALID AND MUST NOT BE POSTED UNTIL IT HAS BEEN PROPERLY COMPLETED AND THE APPROPRIATE SIGNATURES HAVE BEEN OBTAINED.

Requirements	Approval Statement	Signature	Date
Always Required	ENG area coordinator or construction inspector: I have performed the prestart-up activities assigned to me and grant authorization to proceed with the work covered under this SWP.	[illegible signature]	10-3-95
Work is in or within 35 feet of my building	Group leader: I have performed the prestart-up activities assigned to me and grant authorization to proceed with the work covered under this SWP.	[illegible signature]	10-4-95
Radiological Hazards	Health Physics Operations Group (HS-1): I have personally checked the area and grant authorization to proceed with the work covered under this SWP.	NA	
Explosives Hazards	Industrial Hygiene and Safety Group (HS-5): I have personally checked the area and grant authorization to proceed with the work covered under this SWP.	NA	
Health Hazards	Industrial Hygiene and Safety Group (HS-5): I have personally checked the area and grant authorization to proceed with the work covered under this SWP.	Joseph P. [illegible]	10/3/95
Radioactive material filter plenums or fire protection systems taken out of service	Emergency Management and Response/Fire Protection (EM&R/FP): I have personally checked the area and grant authorization to proceed with the work covered under this SWP.	NA	

*MAY NOT EXCEED THREE MONTHS

Form 1563 (4/93)

ST2319

WORK AREA

69

SPECIAL WORK PERMIT FOR SPARK-/FLAME-PRODUCING OPERATIONS

RESTRICTIONS

In accordance with AR 8-4, spark-/flame-producing operations must *not* be conducted

- above or in the vicinity of other employees;
- on walls, metal partitions, or roofs covered with or containing combustible material;
- above areas where combustible or flammable materials may be stored;
- on ducts (for example, exhaust ducts) that may carry cuttings, dust, fumes, or mists of combustible or flammable materials;
- on pipes or other metal in contact with combustible walls, partitions, ceilings, or roofs if ignition by heat conduction or sparks could occur; or
- on used drums, tanks, cylinders, or other containers that have not been thoroughly cleaned, properly made inert, and made safe before spark-/flame-producing operations are conducted.

NOTE: Although ducts and filters may be noncombustible as installed, combustible material (such as dust or grease) may build up over time.

INSTRUCTIONS

1. **SWP Requirement.** This special work permit (SWP) is required for spark-/flame-producing operations conducted outside designed areas (for example, welding areas) or those not controlled by a standard operating procedure (SOP). Spark-/flame-producing operations involve the use of equipment such as welders, oxy-fuel cutting systems, portable grinders or metal saws, propane torches, tar pots, and thermite welding charges. Note the restrictions above.

2. **The SWP Form.** The *operator's supervisor* initiates the SWP form, secures the signatures of the firewatcher and the operator, signs the form, and submits it to the Facilities Engineering (ENG) Division's area coordinator for approval. The *area coordinator* (or the *construction inspector* if the work is part of a construction project) completes the form, secures the appropriate signatures, and gives the completed SWP form back to the operator's supervisor for posting at the work site.

3. **Responsibilities.** Those involved in the spark-/flame-producing operation must follow the prestart-up and operational requirements specified in AR 8-4. The work must not begin until the prestart-up activities have been completed and an approved SWP for that activity has been posted at the work site.

4. **Special Approvals.** If the operation will involve certain hazards (see listing below), special approvals must be received from the Health and Safety (HS) Division or ENG Division, as noted in AR 8-4 and summarized here. These approvals must be received *before* operations begin.

Special Hazard	Approval Needed
Radiological area	Health Physics Operations Group (HS-1)
Explosives	Industrial Hygiene and Safety Group (HS-5)
Possible ventilation problems	Industrial Hygiene and Safety Group (HS-5)
Work will be performed near a chlorinated solvent or will involve cleaning compounds or materials containing cadmium, fluorine, zinc, lead, beryllium, or mercury	Industrial Hygiene and Safety Group (HS-5)
Filter plenums used to filter radioactive airprints	Health Physics Operations Group (HS-1) and Emergency Management and Response/Fire Protection Group (EM&R/FP)
Fire protection system will be taken out of service	Emergency Management and Response/Fire Protection Group (EM&R/FP)

In addition, personnel with approval authority for this operation are urged to consult the appropriate HS and ENG staff for guidance on other environment, safety, and health (ES&H) concerns or fire hazards.

EXCAVATION/SOIL DISTURBANCE PERMIT

P.I./Work Order No. OU1114 — Note: P.I. or Work Order No. required for processing.

Work Order Description: REMOVE CONTAMINATED SOIL — TA: 3

Bldg: 223

Requestor Information Name: LINDA SOBOJINSKI Group: Phone: 5-8339

Customer Information Name: Group: Cost Center Program Code

(indicate to customer that any SWMU review charge will default to customer's division support account if cost center and program code are not provided.)

AUTHORIZATIONS

Firm	Department	Telephone Number	Auth. Number	Issued by	Date Issued	Staking Required	Date Staking Performed	Time Staking Performed
1. JCI	Utilities Support	665-1449	95E-211-03	GENE V	4/10/95	Y ● N ○	5/10/95	9:30
2. JCI	Roads/Grounds	667-6111	4226	EARL H.	5/2/95	Y ○ N ●		
3. LANL	CIC-4 U.S. West	667-6812	95E-211-03	PAT	4-28-95	Y ● N ○		
4. LANL	CST-13	667-6904	CST3-1490	Dolan	4/25/95	Y ○ N ●		
5. LANL	FSS	**	95E-211-03	MARSHA	4/27/95	Y ● N ○		

Pajarito Road Section Office 667-6158
TA-3 Section Office 667-2115
Jemez Road Section Office 667-6481

UTILITIES LOCATED (For UMFS use only)

Water	Primary Electric	Remarks:	
Gas	Secondary Electric		
Sewer	Cooling Water		
Steam	Storm Drains		
Condensate	Telephone		
RLW	Communication		

JCI EMTD (Engineering) review with respect to 29 CFR 1926, excavation involving JCI crews only, and an ES&H review with respect to LANL AR 1-12 shall be attached to this permit prior to issuing. The requestor has complied with the Excavation Permit procedure:

Issued to: Ron Bleyer Date: 5/10/95 Phone: 667-6188 (667-3722 / 667-2221) Pager: 470-0882 Cellular

This Excavation Permit expires one year from the date of issuance.

Form 70-10-001.1 Revised 2/16/94

Los Alamos
Los Alamos National Laboratory
Los Alamos, New Mexico 87545

Environment, Safety, and Health (ES&H)

Excavation Review Record

INSTRUCTIONS

Priority: X-Urgent

The listed actions may involve concerns relating to your field(s) of expertise. Please review and return your comments on this sheet as soon as possible. The document will be returned to Utilities Support Branch/Johnson Control, in care of Leroy Vigil, 665-1449. Thank you for your cooperation.

Date: 04/11/95

Requested By:	Organization	Mail Stop:	Phone:	Fax:
LYNDA SOBOJINSKI	CST-18		5-833	

Project Title
VOLUNTARY CORRECTIVE ACTION FOR FORMER PCB STORAGE AREA

Project Description (if applicable): SWMU# 3-056(c)

TA: 03

Building:

Primary Facility Review Team Contact:

☒ JULIE ESPINOZA, 665-5363

Facility Review Team Technical Contact(s):

Excavation Permit Number: 95E-211-03

Applicable Related Information

Project Identification Number:	
ESH Identification Number:	95-0072
Small Job Ticket Number:	
Service Request Number:	
Work Order Number:	
Communication Work Request Number:	
Contract Number:	
Operable Unit Number:	

Review for: ☒ Excavation Permit ☐ SWMU

Distribution: Date: 04/11/95

☒ LPRT, ESH-3, M768
☒ M. TILLERY, ESH-5 IH, K414
☒ K. MANZ, ESH-20, M887
☒ G. NEELY, ESH-12, K483

Excavation Permit Status: Date: 4-24-95 By: Julie Espinoza

Review Comments:

☐ Approved ☒ Approved with Comments ☐ Disapproved ☐ Cancelled

Los Alamos
Los Alamos National Laboratory
Los Alamos, New Mexico 87545

Environment, Safety, and Health (ES&H)

Excavation Review Record
Comments

Excavation Permit Number: 95E-211-03

Reviewed by: G. Neely, ESH-12, K483	Date: 04/13/95
Comments: APPROVED NO COMMENTS.	
Reviewed by: M. Tillery, ESH-5 IH, K494	Date: 04/17/95
Comments: SEE ATTACHED COMMENTS FROM GERALD LANGNER.	
Reviewed by: K. Manz, ESH-20, M887	Date: 04/20/95
Comments: OKAY FOR ARCHAEOLOGY.	
Reviewed by: LPRT, ESH-3, M761	Date: 04/13/95
Comments: THIS ACTIVITY IS BEING CONDUCTED IN SUPPORT OF THE ER PROJECTS PLANNED ACTIVITY FOR FIELD UNIT #1. LYNDA SOBOJINSKI, THE PROJECT CONTACT, HAS STATED THAT ALL ISSUES REGARDING HEALTH/SAFETY AND WASTE MANAGEMENT ARE BEING ADDRESSED.	

ESH-5 FACILITY REVIEW RECORD

Date: 04-14-95

EXCAVATION PERMIT 95E-211-03

Workcard # 95-12243 HW# 95-224 XU

TITLE: Voluntary corrective action for former PCB storage area.

TA: 03 BLDG: Near 223 ID#: ESH 95-0072

This project has been reviewed by ESH-5 to identify potential Health & Safety Hazards to the employees performing the work and other personnel in the designated area. The health hazards noted have been determined by reviewing the excavation information, inspecting the work site, and evaluating the SOLID WASTE MANAGEMENT UNIT REPORT, LAUR 90-3400 The recommendations and requirements listed are to provide guidance for the health and safety of the work force and to assure compliance with LANL, DOE, and OSHA regulations.

SWMU # 3-056(a)
Hazardous chemicals, agents, materials: PCBs, oils, possible asbestos, lead and other metals.

HAZARDOUS OPERATIONS: Besides the SWMU materials, other hazards include the physical location of many of the sample spots. Many sample spots are located on the steep slopes that lead into Sandia Canyon. The possibilities of falls and trips are present and proper care must be taken to insure no one is injured. Also, if the weather is done during summer weather, the workers must not be overcome by heat, and must watch for the presence of snakes.

Administrative Requirements: (X is required)
Security Clearance
1910.120 Training XXXXX
Site Orientation
Other

Engineering Controls:

MONITORING REQUIREMENTS:
Monitoring required if suspicious material is discovered or suspected to be present during excavation.

Personal Protective Equipment
Minimum is Level D:
Hardhats X
Gloves X
Other
Eye Protection X
Hearing Protection X
Safety Shoes X

Site Safety Plan Required Yes XXXX No

Comments

This Project is APPROVED XX APPROVED WITH COMMENTS DENIED

Signed: Gerald C. Langner ESH-5
Gerald C. Langner

JOHNSON CONTROLS WORLD SERVICES INC.
Engineering Materials, Testing, and Inspection

REVIEW OF EXCAVATION REQUIREMENTS
for Conformance with OSHA 29 CFR 1926 [Subpart P]

Date 4/11/95 Utilities Authorization No. 95E2111-03 EMTD Log No: 3-047-95E
W.O. # 60114 Requester: Sobajinski T.A. # 3-04
Project: Remove Contaminated Soil

I. [ ] Disturbance of soil does not require any personnel entry. Excavation may proceed without futher engineering review.

II. [✓] The soil in the location of the proposed excavation does not appear to have cave-in potential for the depth described. Special protective systems are not required, and the excavation may proceed without further engineering review IF:
   a. the excavation remains less than 5 feet deep; and
   b. the soil is not extremely weak or saturated.

III. An excavation protective system, or modification of an existing system, is required as follows:
   [ ] _____
   [ ] see the attached description / plan / specification.

IV. If the excavation depth reaches 5 feet or more, the requestor must obtain an examination of the soil condition by an EMTD employee:
   [ ] during excavation.
   [ ] prior to first personnel entry, but after installation of the Protective System.

V. [✓] The requestor must prepare an Excavation Protective Systems Plan if the excavation depth reaches 5 feet or greater.

VI. [ ] The requestor must submit an excavation Protective Systems Plan for review and approval by EMTD prior to any personnel entry in the excavation, if the excavation depth reaches 5 feet or greater.

VII. [ ] Other: _____

This evaluation was completed in conformance with OSHA 29 CFR 1926 (subpart P), Excavations, Trenching and Shoring and SPI #30-10-011, Excavation/Trenching: Protective Systems & Safety.

Reviewed By: Paula T. Coar (EMTD, Ph. # 7-7098)

RECEIVED APR 11 1995

cc: DISTRIBUTION: Leroy Vigil, UMFS
Don S. McCoy, EMDO
File, EMTD

Remember!
OSHA 29 CFR 1926.651(j)(2) requires that the edge of the spoil pile and any other loose materials MUST be kept at least 2 feet distant from edge of excavation.

OSHA 29 CFR 1926.652(a)(ii) requires that each employee in an excavation be protected from cave-ins by an adequate protective system when the excavation depth is 5 feet or greater or at a lesser depth if soil conditions warrant.

Form 30-10-011.1 Rev. 1 (3-1-94)

95E-211F03

ESH FACILITY REVIEW RECORD

REQUEST FROM: Lynda Sobejinski DATE 1 95

TITLE Voluntary Corrective Action for Former PCB Storage Area

TA 3 BLDG# ____

ID# _____ PI SR SJT WO CWR CONT. (QU)

ESH REVIEW FOR: SWMU 3-056(c)

( ) EXCAVATION PERMIT# _____

(X) QUESTIONNAIRE 95-0072

( ) JAMES ARELLANO
( ) RICK EDDLEMAN
( ) NINA GALLEGOS
( ) ROBERT GARZA
( ) FIDEL MAESTAS
( ) BOB PLALE
( ) FRED THOMEN

Distribution:

( ) ESH-12	GLENN NEELY
( ) ESH-5 OS	_____
( ) ESH-5 IH	MARVIN TILLERY
( ) CST-7	DAVE MOSS
( ) ESH-20	KARI MANZ
( ) ESH-18	STEVE RAE
( ) ESH-20	MARY SALISBURY
( ) ESH-17	DOUG STAVERT
( ) ESH-19	JEFF CARMICHAEAL
( ) LPRT	_____
( ) OTHER	_____

EXCAVATION INFORMATION

STRUCTURE NUMBER: TA 3 Bldg(s) Behind 223

LOCATION:
(Relation to bldgs, etc.)
Location: behind and to the north of JCI Utilities Shop

LOCATION OF TANK/VALVE PIPE ON/OR IN TANK:

PRIORITY:

REASON FOR: ___Routine ___Urgent ✓ X-Urgent ___Emergency

JOB TO START ASAP

USAGE OF TANK, VALVE, PIPE OR VAULT:

SPECIAL ACCESS REQUIREMENTS:

WORK DESCRIPTION:
Removal of contaminated soil will be performed w/a bull dozer, and hand tools on steep slopes. Thickness of contaminated soil will range from 2 - 3 ft or less

ES&H QUESTIONNAIRE# 95-0072

CONTACTS:
Lynda Scbojinski, CST-18, 5-8339

45-0012

Voluntary Corrective Action Plan for
SWMU 3-056(c) Former PCB Storage Area
Field Unit 1

1. INTRODUCTION

The voluntary cleanup of SWMU 3-056(c), former PCB storage area, is being proposed. The waste area may pose a potential health hazard to those who live, work or recreate near it. The contaminated material associated with this waste area is of relatively high volume but is restricted to a well-defined area. The cleanup alternatives are obvious; however, since contamination is located on a steep slope, they will be technically challenging to implement.

2. SITE BACKGROUND AND ENVIRONMENTAL SETTING

SWMU 3-056(c) is a storage area located behind and to the north of JCI Utilities Shop (TA-3-223) and is a former storage yard for PCB-containing drums and equipment. Included within the SWMU is an area downgradient from the fenced storage area that drains to a tributary of Sandia Canyon.

In preparation for a slope stabilization project in 1991, EM-8 collected five surface soil samples along the fence behind TA-3-223. One sample showed PCB concentrations of 9,600 ppm. The storage area was again sampled in August of 1994 by a FU 1 sampling team. The sampling approach was based in part on information provided by EM-8 personnel and was designed to determine the nature and extent of the PCB contamination. The surface soil was sampled at 67 locations within and downgradient of the storage area (Fig. TA-3-223-1), and analyzed in the field for PCBs using D TECH™ test kits manufactured by EM SCIENCE/Strategic Diagnostics Inc. These results were used to delineate the extent of PCB contamination in the soils and to assist in the selection of 18 confirmatory sample locations. The confirmatory samples, collected at depths from 0 to 36-inches, were sent to a fixed laboratory for one or more of the following analyses: PCBs, VOCs, SVOCs, and/or Appendix VIII Metals.

The PCB results from the 1994 sampling event ranged in concentration from no detection to 980 mg/kg (ppm). Fig. TA-3-223-1 shows the approximate distribution of PCBs in surface soils exceeding a concentration of 1 ppm. This distribution is based on both the field test kit and fixed laboratory data. Of the other analytes tested in the confirmatory samples, none were detected above SALs.

3. VOLUNTARY CORRECTIVE ACTION

This is not a high use area but PCB contamination could be spread by foot traffic and storm water runoff to Sandia Canyon. Removal of the contaminated soil is recommended because it would be readily implementable and is consistent with TSCA requirements for PCB cleanup.

Removal of the contaminated soil will be performed with a bull dozer, front end loader and extended arm back hoe, as appropriate. Hand removal of soils on the steep slope may have to be performed as well. It is anticipated that the thickness of the contaminated soil will range from two to three feet or less, which is also expected to coincide with the soil/tuff interface. Previous soil samples collected were mainly from the 0-6 in interval with a small subset from the 18-24 in interval and the 30-36 in interval. The highest concentrations of PCBs are in the surface soils. To confirm on a real time basis that the contaminated soil has been removed, confirmation samples will be collected and analyzed for PCBs in the mobile chemistry laboratory. Soil removal will continue until residual PCB concentrations are below the cleanup

level. All excavated areas will be backfilled with clean soil/tuff and seeded or covered with appropriate materials.

The contaminated soil will be placed in 55-gallon drums, 3-cubic yard waste management bins or directly into dump trucks pending disposal options coordinated by waste management and FU 1 personnel. Waste will be stored in an appropriate drum storage area pending the sample results.

4. PROJECT MANAGEMENT

Overall implementation of this voluntary cleanup action will be managed be Garry Allen (Field Unit 1 Project Leader). Lynda Sobojinski, Field Unit 1 field manager will oversee the actual work in progress.

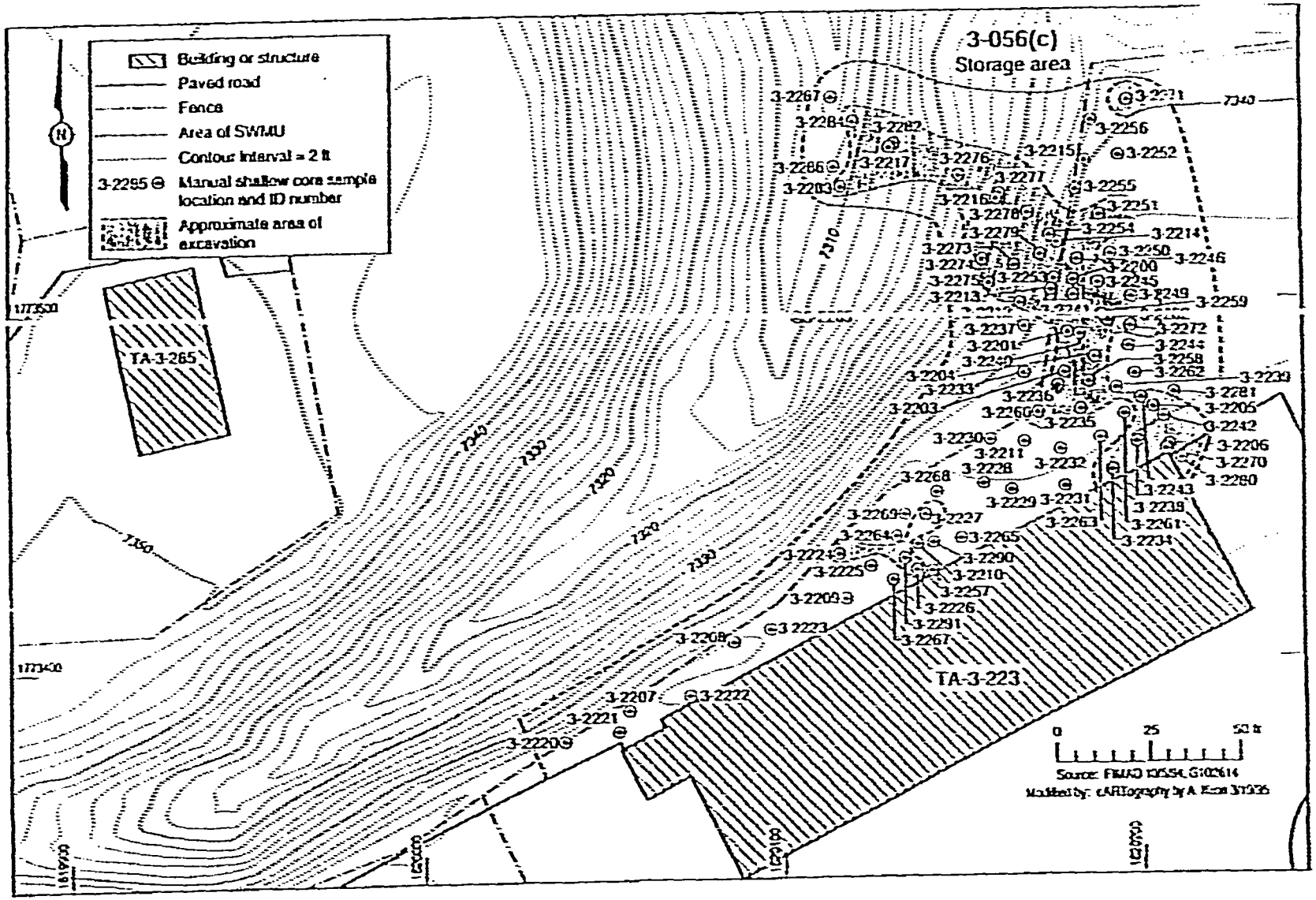


Fig. TA-3-223-1. Sample locations for SWMU 3-056(c), storage area.