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4-29-96

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Draft

Mr. Benito Garcia, Chief
Hazardous and Radioactive
Materials Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, NM 87502

Re: Statement of Basis for 89 No Further Action Units
Los Alamos National Laboratory (NM0890010515)

Dear Mr. Garcia:

Enclosed is a draft version of a statement of basis (SOB) for determination of no further action for 89 solid waste management units (SWMUs) at Los Alamos National Laboratory (LANL). These sites were part of a Class 3 permit modification initiated by LANL in March 1995. Ms. Hoditschek, of your staff, indicated in a meeting with EPA on March 27, 1996, that she would like a draft copy of this SOB, and NMED would complete the remainder of the Class 3 permit modification for these sites.

EPA received draft comments on this permit modification from the NMED Agreement in Principle (AIP) staff in February 1996. EPA has underlined SWMUs in the SOB for which the AIP had concerns or felt documentation was not adequate. EPA has concerns about documentation for SWMUs 3-039(a) and 35-002. NMED may handle these sites in one of the following ways:

1. Remove these sites from the remainder of the Class 3 permit modification process until all the outstanding issues are resolved, and finalize this portion of the modification at a later date.
2. Proceed with the second public notice and comment period, and resolve outstanding issues during this time period prior to issuing a final determination.

Should you have any questions, please feel free to contact Ms. Barbara Driscoll of my staff at (214) 665-7441.

Sincerely,

David W. Neleigh, Chief
New Mexico and Federal
Facilities Section

Enclosure

FILE LANL HSWA
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EPA ANNOUNCES STATEMENT OF BASIS AND REMEDY SELECTION SUMMARY

In this Statement of Basis, the U.S. Environmental Protection Agency (EPA) has made a determination to approve the Los Alamos National Laboratory (LANL) Class 3 permit modification requests to remove eighty-nine (89) solid waste management units (SWMUs) from Module VIII, the Hazardous and Solid Waste Amendments (HSWA) portion of the Resource Conservation and Recovery Act (RCRA) permit (EPA Identification Number NM0890010515).

Facility/Unit Type: Storage, Treatment and Disposal

Contaminants: The facility operations generated hazardous and radioactive materials including mixed wastes, as well as, metals, explosives, solvents, acids, waste oils, and polychlorinated biphenyls (PCBs).

Media: Soils

Remedy: No further action for eighty-nine SWMUs and removal of contaminants from four SWMUs.

A. FACILITY DESCRIPTION

LANL is 43 square miles in size and is located adjacent to the town of Los Alamos, New Mexico. The facility is located on a mesa and canyon landscape with relief averaging about 300 feet from the tops of the mesa to the canyon bottoms. The majority of the building and technical areas (TAs) are located on the mesa tops.

LANL has been in operation since the early 1940's. It is a government owned (by the Department of Energy) and contractor operated (by the University of California). LANL is the site of research and development for the first atomic bomb. Throughout its history, LANL has conducted experimental research on nuclear weapons and explosive materials. Disposal activities started in the early 1940's and continue to present day.

B. HISTORY OF INVESTIGATION

EPA issued Module VIII, the HSWA permit, on March 8, 1990, with the effective date of the permit being May 23, 1990. The original permit required investigation of 603 SWMUs. An additional, 496 SWMUs have been added to the permit by other permit modifications making a total number of 1099 SWMUs requiring investigation under the RCRA corrective action process.

Under the corrective action process, LANL is required to determine the type, concentration and extent of hazardous waste released into the environment at all SWMUs. Upon completion of the investigation, LANL is to recommend corrective action options for each SWMU. Corrective action options must be approved by EPA. Currently, EPA has approved work plans requiring sampling and analysis for the

majority of LANL's SWMUs.

C. INVESTIGATION RESULTS

During the preliminary investigation of many of the SWMUs at LANL, it was determined that many of the sites identified as SWMUs had never handled hazardous waste including hazardous constituents regulated under RCRA. Some sites could not be located, were found to be duplicates of other sites, or were included in investigations of other SWMUs. These are some of the types of SWMUs which LANL requested for no further action in their Class 3 permit modification dated March 27, 1995. LANL has developed no further action (NFA) criteria which has been approved by EPA. The 89 SWMUs are categorized based on this NFA criteria.

A brief description of each of the 89 SWMUs identified for NFA is attached. A more detailed description can be found in the Class 3 permit modification request from LANL dated March 27, 1995, or in LANL's RCRA Facility Investigation (RFI) work plans as indicated in the permit modification request.

A copy of the permit, the Class 3 permit modification request, EPA's statement of basis and remedy selection, and supporting documents may be reviewed at:

LANL's Community Reading Room
1350 Central Avenue, Suite 101
Los Alamos, NM

Santa Fe Public Library
145 Washington Avenue
Santa Fe, NM

Española Public Library
314A Oñate St. NW
Española, NM

Governor's Office
San Ildefonso Pueblo
San Ildefonso, NM

D. EXPOSURE PATHWAYS

The media for potential impacts to the environment are soil and surface water.

E. SELECTED REMEDY

EPA's determination of no further action is based on the following criteria:

1. The site cannot be located or has been found not to exist, is a duplicate SWMU, or is located within and therefore, investigated as part of another SWMU.
2. The SWMU has never been used for the management (that is, generation, treatment, storage or disposal) of RCRA solid or hazardous wastes and/or constituents or other Comprehensive Environmental Response, Compensation

and Liability Act of 1980 (CERCLA) hazardous substances.

3. No release to the environment has occurred, nor is likely to occur in the future. The term "release" by definition means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous constituents) into the environment.

4. There was a release, but the site was characterized and/or remediated under another authority which adequately addresses corrective action, and documentation, such as a closure letter, is available.

5. The SWMU 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.

Each site proposed for NFA is described under the applicable NFA criteria.

F. PUBLIC PARTICIPATION

Public hearings were held by LANL on May 9, 1995, in Pojoaque, New Mexico. Two meeting sessions, 4:00 p.m. to 6:00 p.m., and 7:00 p.m. to 9:00 p.m. were held at the Pojoaque High School Gym.

The meeting sessions included a short presentation on the proposed permit modification and informal discussions among small groups of people seated at roundtables. Project representatives were available at the roundtables to discuss individual questions. Facilitators were also present at each table to aid with discussion and to write down issues and comments from the people at each table.

The attendance lists for the sessions indicated 36 attendees were present at the first session and 22 at the second session.

Due to the nature of the format, using roundtables with group discussions, comments at the meetings varied in nature. Many questions related to clarification of the NFA and corrective action process, as well as, the role of the various agencies in the process. There were also numerous comments on issues related to LANL, but not related to the permit modification. No comments on specific SWMUs were made either in the roundtable discussions or in the written evaluations of the meetings.

G. NEXT STEPS

In addition to advertising the final decision, EPA will notify the applicant and each

person on the public comment mailing list of the final decision. The final decision will become effective thirty (30) days after service of notice of decision unless a later date is specified or review is requested under regulation 40 CFR 124.19. If no comments are received to request a change in the final determination, the decision to approve the application will become effective immediately upon issuance.

CONTACT: Barbara Driscoll
U.S. EPA, Region 6
New Mexico and Federal
Facilities Section (6PD-N)
1145 Ross Avenue
Dallas, TX 75202
(214) 665-7441

Discussion of SWMU's Requiring No Further Investigation Under the Class 3 Permit Modification Process.

NFA Criterion 1. The site cannot be located or has been found not to exist, is a duplicate SWMU, or is located within and therefore, investigated as part of another SWMU.

1. SWMU 8-006(b)—Landfill (OU 1157)

Potential Release Site 8-006(b) is described as a disposal area near Building TA-8-21. There is a material disposal area known as MDA Q [SWMU 8-005(a)] located south of Building TA-8-21. This is considered a duplicate site for SWMU 8-006(b) which remains on the HSWA portion of the permit to be investigated.

2. SWMU 15-004(i)-Detonation Ground (OU 1086)

SWMU 15-004(i) was reported to be an area where two test blasts were conducted in 1944 in "The Gulch", approximately 1 mile below R-site at an unknown precise location. The location of this site could not be found.

3. SWMU 22-011—Disposal Pit (OU 1111)

The Report (LANL 1990, 0145) describes 22-011 as a pit prepared in 1946 for the disposal of discarded objects and associates this pit with a disturbed area south of Building TA-22-1. The exact location of this site is not known and it is expected to be included under the investigation of SWMUs 7-001(a) or 22-015(d).

4. SWMU 40-001(a)—Septic System (OU 1111)

A septic tank is not listed on specific drawings. No evidence has been found in the archives or in the field that a septic system ever existed in this area.

5. SWMU 46-004(a)—Waste line (OU 1140)

SWMU 46-004(a) is a drain line from Building TA-46-31. This line is determined to be a part of SWMU 46-004(c), a dry well system, and will be investigated under SWMU 46-004(c).

6. SWMU 46-008(c)—Storage Area (OU 1140)

SWMU 46-008(c) is identified in the Report as a site where barrels, cans, and drums are located "in a fenced area" (LANL 1990, 0145). After a review of all available records and aerial photographs, the exact location of this SWMU is not verifiable.

7-8. SWMUs 52-002(c and d)—Septic Systems (OU 1129)

SWMUs 52-002(c and d) represent septic systems that apparently were planned but never constructed.

9. SWMU 54-013(a)—Decontamination Facility (OU 1148)

LANL planned to build a truck washing pit at TA-54 West; however, construction of the facility were subsequently canceled, and no such area exists.

NFA Criterion 2. The SWMU has never been used for the management (that is, generation, treatment, storage or disposal) of RCRA solid or hazardous wastes and/or constituents or other CERCLA hazardous substances.

10. SWMU 0-005—Landfill (OU 1071)

SWMU 0-005 (Mortandad Canyon "Landfill") is a small fenced area used to examine the transport of radioactive particulates from the ground surface to plants as a result of rain splash. Soil from within the fenced area was mixed with short-lived radionuclides which have decayed to negligible levels since the cessation of the experiments. The site has never handled RCRA hazardous constituents.

11. SWMU 1-001(h)—Septic Tank 142 (OU 1078)

Septic Tank 142 was used exclusively for domestic sewage and was removed in 1976.

12. SWMU 1-001(i)—Septic Tank 143 (OU 1078)

Septic Tank 143 served the domestic sewage needs of the former J-Division Annex/Warehouse 3. The tank was used exclusively for domestic sewage and was removed in 1975.

13. SWMU 1-001(j)—Septic Tank 149 (OU 1078)

Tank 149 was misidentified as a septic tank and was actually an above ground storage tank used for the storage of a dielectric gas. No release has occurred from this tank.

14. SWMU 1-001(k)—Septic Tank 268 (OU 1078)

SWMU 1-001(k) was used exclusively for domestic sewage. The tank was documented to have been removed in 1964 along with the TU Building.

15. SWMU 1-001(l)—Septic Tank 269 (OU 1078)

Septic Tank 269 was used exclusively for domestic sewage.

16. SWMU 1-001(n)—Septic Tank 276 (OU 1078)

SWMU 1-001(n) was used exclusively for domestic sewage, and removed in 1977.

17. SWMU 3-009(b)—Surface Disposal (OU 1114)

SWMU 3-009(b) is a pile of soil, natural tuff rubble, some road-construction debris including concrete blocks and asphalt chunks, plus a few pieces of PVC piping. A review of 1991 aerial photographs indicate the disposal area is the result of construction of an adjacent parking lot.

18. SWMU 3-009(c)—Surface Disposal (OU 1114)

SWMU 3-009(c) is described as a "disturbed area" south of Sigma Building, TA-3-66, on the north rim of Mortandad Canyon. The area was found to be soil fill with some debris from a security fence which had been removed.

19. SWMU 3-009(e)—Surface Disposal (OU 1114)

SWMU 3-009(e) was created during site preparation for Technical Area 3, and is an area of soil fill and with some asphalt and concrete debris.

20. SWMU 3-009(f)—Surface Disposal (OU 1114)

Review of aerial photos indicates that this area is road fill with a few concrete blocks.

21. SWMU 3-009(g)—Surface Disposal (OU 1114)

SWMU 3-009(g) was determined to be the site of a borrow pit for material to build the Two mile Canyon Bridge.

22. SWMU 3-012(a)—One-Time Spill (OU 1114)

SWMU 3-012(a) was not a spill but a controlled operational pipe-cleaning procedure. This procedure resulted in the release of 5,000 gallons of a 20 ppm fluoride laden solution into a temporary retention pond. Lime placed in the retention pond at the time of the planned release effectively nullified the corrosive effects of dissolved fluoride. No hazardous constituents were identified at the site.

23. SWMU 3-018—Septic System (OU 1114)

SWMU 3-018 is a cesspool installed in 1952 during the original construction of the Van de Graaff Building. The cesspool was never hooked up to the building and was subsequently filled with soil and abandoned in place in July 1964.

24. SWMU 3-020(a)—Disposal Pit (OU 1114)

SWMU 3-020(a) was described as a covered pit containing a buried 32-gal. drum backfilled with gravel and fitted with a screen. The pit was used to bleed condensate and seal oil leakage from the air compressor tank which was outside the building. The only substances present in the bleed-off were water and seal oil. The pit was removed in 1990.

25. SWMU 8-003(b)—Septic System (OU 1157)

This septic tank was installed in early 1949 to serve an office building, and was only used for domestic sewage.

26. SWMU 8-003(c)—Septic System (OU 1157)

This septic tank was installed in early 1950 to serve office Building AW-9 in Technical Area 8 (TA-8) and was only used for domestic sewage. The tank was filled with tamped earth and abandoned in place in 1968.

27. SWMU 9-003(c)—Electric Manhole (OU 1157)

Structure TA-9-85 was an electrical control manhole built in 1943 which was misidentified as a sump. The manhole was removed in 1985. The SWMU was never used for the generation, treatment, or disposal of hazardous or radioactive wastes.

28. SWMU 9-003(f)—Settling Tank (OU 1157)

This settling tank was installed in 1950 to serve Building TA-51, and was previously misidentified as a sump. The tanks was removed when the building was modified later that year. There is no laboratory work or hazardous waste generated in this building.

29. SWMU 9-005(b)—Septic System (OU 1157)

This septic tank is an inactive, sanitary septic tank that received only sanitary liquid waste from Buildings TA-9-21, -28, and -29. Although these buildings contained high-explosives laboratories and offices; a machine shop; and chemical equipment storage, they were designed with industrial waste drains separate from the sanitary sewer drains for the toilets and sanitary sinks. There is no reason to believe hazardous or

radioactive wastes were ever generated, treated, or disposed of in this septic tank.

30. SWMU 9-005(c)—Septic System (OU 1157)

This is an inactive septic tank located slightly north of Building TA-9-40. This septic tank received only sanitary waste from Buildings TA-9-21, -33, -34, -37, and -38. Although these buildings contained high-explosives laboratories, processing, and offices, they were designed with industrial waste drains separate from the sanitary sewer drains for the toilets and sanitary sinks. There is no reason to believe hazardous or radioactive wastes were ever generated, treated, or disposed of in this septic tank.

31. SWMU 9-005(e)—Septic System (OU 1157)

This sanitary septic tank, received only sanitary waste from Buildings TA-9-41, -42, -43, -45, and -46. Although some of these buildings were used for high-explosive processing, they were designed with industrial waste drains separate from the sanitary sewer drains for the toilets and sanitary sinks. There is no reason to believe hazardous or radioactive wastes were ever generated, treated, or disposed of in this septic tank.

32. SWMU 9-005(f)—Septic System (OU 1157)

This sanitary septic tank, was installed in 1952 and received sanitary waste from Building TA-9-48. Although Building TA-9-48 was operated as a high explosives machining building, it was designed with industrial waste drains separate from the sanitary sewer drains for the toilets and sanitary sinks. There is no reason to believe hazardous or radioactive wastes were ever generated, treated, or disposed of in this septic tank.

33. SWMU 9-005(g)—Septic System (OU 1157)

This sanitary septic tank, was installed in 1952 receives only sanitary waste from Building TA-9-50. The tank was connected only to sanitary waste lines from this building.

34. SWMU 9-005(h)—Septic System (OU 1157)

This septic tank, was installed in 1951 and located northeast of TA-9-51. This tank received only sanitary waste from Building TA-9-51.

35. SWMU 9-007—Basket Pit (OU 1157)

Structure TA-9-202 is an inactive basket pit built in 1952 as a replacement to a settling tank at Building TA-9-51. Operations in this building did not employ hazardous materials. There is no reason to believe hazardous or radioactive wastes were ever

generated, treated, or disposed of in this structure.

36. SWMU 10-006—Burn Site (OU 1079)

Various burning operations were conducted at Technical Area 10 (TA-10), primarily during the 1950s and early 1960s. SWMU 10-006 is proposed for no further action as an individual unit because its location could not be determined. During decommissioning many structures were burned at TA-10.

37. SWMU 11-007—Surface Disposal (OU 1082)

SWMU 11-007 is a surface disposal area containing concrete blocks and some road-building debris located at the head of the small canyon drainage that borders the south side of the major developed area at TA-11. No evidence has been found to indicate that the concrete blocks or road-building debris contain RCRA hazardous or radioactive constituents.

38. SWMU 11-011(c)—Industrial or Sanitary Wastewater Treatment (OU 1082)

SWMU 11-011(c), described as the outfall from the boiler steam vent pipe associated with building TA-11-24. The SWMU is the area where condensates may collect on the asphalt adjacent to the building which formerly housed the air-gun facility and currently houses an office and light machine shop. The steam condensate that may soak into the asphalt presents no current human health or environmental risk.

39. SWMU 12-002—Open Burning Ground (OU 1085)

SWMU 12-002 is an area located in the roadbed just east of TA-12-4 which was used on one occasion to burn scrap HE. Based on available documentation, SWMU 12-002 was the site of a onetime event and was not a waste disposal area.

40. SWMU 16-005(o)—Septic System (OU 1082)

SWMU 16-005(o) is a septic tank which served building TA-16-101 (a guard house) and only handled domestic sewage.

41. SWMU 16-006(b)—Septic System (OU 1082)

SWMU 16-006(b) is a concrete septic tank which serves TA-16-210, an inactive guard house, and handled only sanitary waste.

42. SWMU 16-006(f)—Septic System (OU 1082)

This SWMU is a septic tank, TA-16-1153, that was constructed in 1987 to service

new toilet facilities on the first floor of TA-16-370. This septic tank was placed in service after March 1987, and receives only sanitary waste.

43. SWMU 21-012(a)—Dry Well (OU 1106)

This SWMU was identified as "...a dry well inside the steam plant (TA-21-357) that receives liquids from the steam plant." The former steam plant (TA-21-9) was removed in 1985 and the dry well was also removed.

44. SWMU 33-004(e)—Seepage Pit (OU 1122)

This seepage pit is all that remains of a septic system tank which served an office building. The system was only used for domestic sewage.

45. SWMU 33-004(f)—Septic System (OU 1122)

It consists of 1000-gallon fiberglass septic tank that serves a residential trailer, TA-33-181. Discharges to this septic tank were sanitary wastes from a residential trailer.

46. SWMU 35-003(i)—Wastewater Treatment Facility (OU 1129)

SWMU No. 35-003(i) is the site of two steel surge tanks that were used to accommodate gas pressure excursions from the gas laser facility in TA-35-29. Helium and nitrogen gases were the only substances handled by these tanks. Therefore, the tanks never handled RCRA hazardous constituents.

47. SWMU 35-003(p)—Wastewater Treatment Facility (OU 1129)

SWMU 35-003(p) is the site of the former air filter building (TA-35-7) which housed air-filtering equipment for treating contaminated air from the original laboratory/office building (TA-35-2). The building has previously undergone decommissioning and decontamination (D&D) activity, and is currently scheduled removal. Contaminants were of a radioactive nature.

48. SWMU 36-003(c)—Septic System (OU 1130)

This septic system was built in 1985 to receive sanitary waste from guard station TA-36-70. There is no evidence that this septic system has ever received anything other than sanitary waste.

49. SWMU 39-003—Incinerator (OU 1132)

From 1955 to 1977 this small incinerator was used primarily to burn office waste. There is no indication that it was ever used for disposal of hazardous materials. The exact location of the former incinerator site is not known, and the incinerator itself was previously removed to the Technical Area 39 landfill.

50. SWMU 39-006(b)—Septic System (OU 1132)

This active septic system serves Building TA-39-111 (the Pulsed Power Assembly Building). The system was built in 1989, and was designed for sanitary waste disposal only.

51-53. SWMUs 52-001(a, b, and c)—UHTREX Equipment (OU 1129)

SWMUs Nos. 52-001(a through c) consist of equipment that was associated with the filter and cooling systems of the UHTREX reactor. These sites underwent D&D in 1989 and were decontaminated to levels below DOE guidelines for radioactivity. No process-related source for nonradioactive hazardous constituents exists at these sites; therefore, no hazardous contaminant source term exists.

54. SWMU 52-001(d)—UHTREX Equipment (OU 1129)

SWMU No. 52-001(d) is the site of contaminated equipment that was associated with the UHTREX reactor. The contaminated equipment was removed in 1989, and the building was decontaminated to levels below DOE guidelines for radioactivity. No hazardous constituents were of concern.

55-56. SWMUs 52-002(b and f)—Septic Systems (OU 1129)

SWMUs 52-002(b and f) are active septic systems that were installed in the early 1980s and have served only office buildings in which no hazardous or radioactive materials have ever been managed.

57. SWMU 54-001(c)—Storage Area (OU 1148)

This site includes a temporary berm with an enclosed steel tank for the storage of waste oil and hazardous materials at MDA L. The tank was used to collect rainwater, and was never used to store waste oil or hazardous materials. The berm and tank have been removed.

58. SWMU 54-007(b)—Septic System (OU 1148)

This septic system served office building TA-54-22, and was only used for sanitary sewage.

59. SWMU 55-009—Sumps and Tanks (OU 1129)

SWMU 55-009 is an inactive sump located outside TA-55-6 which was used to monitor sanitary waste liquids for radioactivity before they are discharged to the sewage treatment lagoons. Radioactivity was never detected at the sump and hazardous wastes were not generated, treated, stored, or disposed of at the site.

60. SWMU 59-001—Septic System (OU 1114)

SWMU 59-001 was a septic system, now removed, that included a tank with two compartments and a drain field. Since its construction in 1964, an industrial waste line has transported laboratory wastes from the building to the treatment facility located at TA-50, indicating that the septic system handled only sanitary waste.

61. SWMU 60-002—Storage Area (OU 1114)

SWMU 60-002 consists of three storage areas containing piles of materials such as large concrete blocks, piles of cured asphalt chunks, cables, soil with some asphalt and concrete, concrete fence post supports, pipe, metal strips, wood, and similar debris located on Sigma Mesa. The materials appear to have been accumulated from several activities including building construction, fence relocation, mesa leveling, and decommissioning of a temporary water line.

62. SWMU 61-004(a)—Septic Tank (OU 1114)

SWMU 61-004(a) is reported to be an inactive septic system located northeast of the radio repair shop, TA-61-23. The existence of the system is questionable. The septic system is not included on LANL engineering drawings and there are no records of a septic system being removed or abandoned in place at this location. There is no record of hazardous or radioactive material being used at building TA-61-23.

NFA Criterion 3. No release to the environment has occurred, nor is likely to occur in the future. The term "release" by definition means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous constituents) into the environment.

63. SWMU 3-039(a)—Silver Recovery Unit (OU 1114)

SWMU 3-039(a) is the site of photographic processing operations at TA-3-43. Rinse water circulating through the processor discharges to the sanitary sewer system through a floor drain. Drain lines that transported silver wastes will be addressed during decontamination and decommissioning (D&D) of each building. Monitoring of the effluent from lines in TA-3 into the sewer system, failed to identify RCRA-

regulated analytes over detection limits. Therefore, it is believed that this SWMU poses no threat.

64. SWMU 8-007—Silver Recovery Unit (OU 1157)

Building TA-8-22 was built to accommodate radiography activities. Some excess silver from the developing of radiographic film was left behind in the fixer solution and was reclaimed in resin recovery beds that were located inside the building. The recovery beds utilized a plastic filter can to recover silver and discharged to the outfall at SWMU 8-009(d). The silver recovery beds are no longer in place and there were no reported spills or leaks associated with the recovery bed filter cans.

65. SWMU 35-004(e)—Container Storage Area (OU 1129)

SWMUs 35-004(d and e) are container storage areas located inside buildings throughout Technical Area 35. These storage areas were inspected in August 1991, and there was no evidence of spills. Any release would be contained within the building.

66. SWMU 35-011(a)—Underground Storage Tank (OU 1129)

SWMU 35-011(a) consists of two active aboveground tanks located in the basement of building TA-35-2. The tanks receive potentially contaminated wastewater; however, a release to the environment is precluded by containment within the basement or by diversion through floor drains to sanitary-waste lagoons.

67-70. SWMUs 35-013(a, b, c, and d)—Sumps (OU 1129)

SWMUs 35-013(a, b, c, and d) consist of several sumps, drains, and catch basins that are located within buildings TA-35-2, TA-35-27, TA-35-85, and TA-35-213. The sumps and drains receive contaminated sanitary and industrial wastewater. No potential exists for contamination to migrate to the environment.

71-73. SWMUs 48-004 (a, b, and c)—Sumps and Tanks (OU 1129)

SWMUs 48-004(a, b, and c) consist of several sumps and tanks that were abandoned in place in building TA-48-1. The sumps and tanks are considered to be under institutional control and no mechanism for release of COCs to the environment can be determined. No physical evidence exists to indicate a release or external contamination.

74. SWMU 54-015(h)—Storage Area (OU 1148)

A drum storage area, SWMU 54-015(h), is located in building TA-54-38. The

Nondestructive Testing Facility (NDT) at TA-54-38 has briefly and will handle containerized transuranic (TRU) wastes that contain transuranic radionuclides and mixed waste constituents. Any release would be contained within the building.

75. SWMU 55-008—Sumps and Tanks (OU 1129)

SWMU 55-008 consists of several sumps and tanks that are located in the basement of building TA-55-4. No potential exist for any contamination from the building.

NFA Criterion 4. There was a release, but the site was characterized and/or remediated under another authority which adequately addresses corrective action, and documentation, such as a closure letter, is available.

76. SWMU 16-010(g)—Wastewater Treatment Facility (OU 1082)

SWMU 16-010(g) is a carbon filter/treatment unit, which was constructed in 1988 to treat waste water draining from the pressure filter tanks (TA-16-401 and TA-16-406). This SWMU was built after 1987 and has always operated under an national pollutant discharge elimination system (NPDES) permit.

77-86. SWMUs 16-012(d, i, j, l, m, n, p, t, u, and x)—Satellite Storage (OU 1082)

These SWMUs are satellite, less-than-ninety-day, and interim storage areas regulated under 3004(a) of the RCRA. If a release occurred at one of these areas, it would be cleaned up immediately in accordance with LANL's Spill Prevention Countermeasures and Control Plan. These storage areas are inspected annually.

87. SWMU 35-006—Surface Impoundment (OU 1129)

SWMU 35-006 is an unlined waste-oil impoundment that was replaced by AOC No. 35-005(a) in 1985. In 1989 the contents of the impoundment, the concrete liner, and contaminated soils were removed and backfilled. Post-closure verification samples revealed above regulatory threshold concentrations of contaminants in surface samples. Site closure is being overseen by the New Mexico Environment Department under RCRA closure requirements.

88. SWMU 3-043(e)—Underground Tank (OU 1114)

SWMU 3-043(e) was an underground storage tank located at service station TA-3-36. The tank was removed in 1989 under New Mexico Underground Storage Tank regulations.

NFA Criterion 5. The SWMU 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.

89. SWMU 35-002—Material Disposal Area (OU 1129)

SWMU 35-002, MDA-X, is the site of the Los Alamos Power Reactor Experiment No. 2 (LAPRE-II) reactor, which was buried in place after it was decommissioned in 1959. The 2-ft-diameter reactor pressure or "core" vessel is located inside an 8-ft-diameter, heavy walled, stainless-steel vessel. The fuel reservoir is copper-lined stainless-steel tank approximately 1 ft in diameter by 10 ft long. The reservoir and pipe are contaminated with residual $^{235}\text{UO}_2$ /phosphoric acid fuel solution and associated fission products. Although the $^{235}\text{UO}_2$ fuel solution was drained from the reactor and fuel reservoir in 1959, as much as 30 grams (0.1 Curie) of the liquid fuel solution and neutron activation and fission products were believed to remain within the system.

This site was remediated in 1991 as an Environmental Restoration Interim Action. Confirmatory soil sampling verified the removal of all radionuclides and hazardous chemicals.