

Permit



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ENVIRONMENT DEPARTMENT

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PETER MAGGIORE
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

November 17, 2000

Mr. David A. Gurule, Area Manager
Los Alamos Area Office
Department of Energy
528 35th Street
Los Alamos, New Mexico 87544

Dr. John C. Browne, Director
Los Alamos National Laboratory
P.O. Box 1663, MS A100
Los Alamos, New Mexico 87545

**RE: INTENT TO APPROVE: PETITION FOR NO FURTHER ACTION OF 30 SOLID WASTE MANAGEMENT UNITS
LOS ALAMOS NATIONAL LABORATORY (LANL) NM 0890010515
HRMB-LANL-99-036**

Dear Mr. Gurule and Dr. Browne:

The New Mexico Environment Department (NMED) will issue a Public Notice with intent to approve the Class III permit modification requested by the Department of Energy (DOE)/LANL. This modification consists of approval of No Further Action (NFA) status for thirty (30) Solid Waste Management Units (SWMUs) at LANL and deletion of these SWMUs from Tables A, B and C of the Resource Conservation and Recovery Act (RCRA) permit issued to the DOE/LANL. These 30 SWMUs were contained in the submittals *Request for Permit Modification: Units Proposed for No Further Action* submitted by DOE/LANL, dated March and September 1995 and September 1996. These requests included 190 SWMUs to be considered for removal from the permit. To date NMED has approved and removed 102 SWMUs from LANL's permit. The 30 proposed SWMUs for approval are identified in Attachment A.

A public notice of this proposed action is scheduled for publication in the **November 22, 2000** issue of the **Albuquerque Journal, The New Mexican, El Hispano News, and the Los Alamos Monitor**. The 45-day public comment period will extend from **November 22, 2000** through **January 8, 2001**.



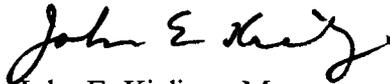
LANL

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Enclosed for your review are copies of Tables A, B and C showing proposed changes in redline and strikeout and copies of Tables A, B and C as they would appear after final approval. Also enclosed are copies of the public notice and fact sheet sent to persons and organizations on the LANL mailing list, and the statement of basis, which provides additional information for the public about this action. These documents will also be available for public review at the NMED Hazardous Waste Bureau office in Santa Fe and at the LANL Community Relations Reading Room in Los Alamos. Procedures for submitting official comments are contained in the fact sheet.

Please call Neelam Dhawan of my staff at (505) 827-1557 if you have any comments or questions.

Sincerely,



John E. Kieling, Manager
Permits Management Program
Hazardous Waste Bureau

JEK:nmd

Enclosures

cc: J. Bearzi, NMED HWB
~~J. Parker~~, NMED DOE OB
S. Yanicak, NMED DOE OB, MS J993
M. Leavitt, NMED GWQB
J. Davis, NMED SWQB
D. Neleigh, EPA, 6PD-N
J. Vozella, DOE LAAO, MS A316
T. Taylor, DOE LAAO, MS A316
J. Canepa, EM/ER, MS M992
D. McInroy, LANL EM/ER, MS M992
M. Kirsch, EM/ER, MS M992

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ATTACHMENT A

The thirty (30) sites proposed for NFA and removal from LANL's permit through this action are:

3-002(a)	3-045(i)	18-007
3-002(d)	3-049(c)	27-001
3-009(c)	3-049(d)	35-004(e)
3-009(g)	3-050(e)	35-006
3-019	3-052(c)	35-011(a)
3-025(a)	3-055(d)	35-013(d)
3-026(b)	3-056(m)	54-007(b)
3-032	3-056(n)	54-015(h)
3-043(e)	11-011(c)	59-001
3-044(a)	16-005(b)	61-004(a)

TABLE A, TABLE B and TABLE C

Note:

This appendix contains the proposed Tables A, B and C of the LANL HSWA Module. The number at the bottom of each technical area denotes the number of SWMUs on the HSWA Module for that area. The number at the end of the appendix indicates the total number of SWMUs on the HSWA Module.

TABLE A

SWMU Numbers	1-007(e)	3-036(a)	7-001(b)	9-009
Technical Area 0	1-007(j)	3-036(c)	7-001(c)	9-013
0-001	1-007(l) (30)	3-036(d)	7-001(d) (4)	C-9-001 (35)
0-003		3-037		
0-011(a)	Technical Area 2	3-038(a)	Technical Area 8	Technical Area 10
0-011(c)	2-005	3-038(b)	8-002	10-001(a)
0-011(d)	2-006(a)	3-056(a)	8-003(a)	10-001(b)
0-011(e)	2-006(b)	3-056(c) (43)	8-004(a)	10-001(c)
0-012	2-007		8-004(b)	10-001(d)
0-016	2-008(a)	Technical Area 4	8-004(c)	10-002(a)
0-017	2-008(b)	4-001	8-004(d)	10-002(b)
0-018(a)	2-009(a)	4-002	8-005	10-003(a)
0-019	2-009(b)	4-003(a)	8-006(a)	10-003(b)
0-028(a)	2-009(c) (9)	4-003(b) (4)	8-009(a)	10-003(c)
0-028(b)			8-009(d)	10-003(d)
0-030(a)	Technical Area 3	Technical Area 5	8-009(e)	10-003(e)
0-030(b)	3-001(k)	5-001(a)	C-8-010 (12)	10-003(f)
0-030(g)	3-002(c)	5-001(b)		10-003(g)
0-030(l)	3-003(a)	5-002	Technical Area 9	10-003(h)
0-030(m)	3-003(b)	5-003	9-001(a)	10-003(i)
0-033	3-003(c)	5-004	9-001(b)	10-003(j)
0-039 (20)	3-009(a)	5-005(a)	9-001(c)	10-003(k)
	3-009(d)	5-005(b)	9-001(d)	10-003(l)
Technical Area 1	3-010(a)	5-006(b)	9-002	10-003(m)
1-001(a)	3-012(b)	5-006(c)	9-003(a)	10-003(n)
1-001(b)	3-013(a)	5-006(e)	9-003(b)	10-003(o)
1-001(c)	3-014(a)	5-006(h) (11)	9-003(d)	10-004(a)
1-001(d)	3-014(b)		9-003(e)	10-004(b)
1-001(e)	3-014(c)	Technical Area 6	9-003(g)	10-005
1-001(f)	3-014(d)	6-001(a)	9-003(h)	10-006
1-001(g)	3-014(e)	6-001(b)	9-003(i)	10-007 (26)
1-001(m)	3-014(f)	6-002	9-004(a)	
1-001(o)	3-014(g)	6-003(a)	9-004(b)	Technical Area 11
1-001(s)	3-014(h)	6-003(c)	9-004(c)	11-001(a)
1-001(t)	3-014(i)	6-003(d)	9-004(d)	11-001(b)
1-001(u)	3-014(j)	6-003(e)	9-004(e)	11-001(c)
1-002	3-014(k)	6-003(f)	9-004(f)	11-002
1-003(a)	3-014(l)	6-003(g)	9-004(g)	11-004(a)
1-003(d)	3-014(m)	6-003(h)	9-004(h)	11-004(b)
1-003(e)	3-014(n)	6-005	9-004(i)	11-004(c)
1-006(a)	3-014(o)	6-006	9-004(j)	11-004(d)
1-006(b)	3-014(p)	6-007(a)	9-004(k)	11-004(e)
1-006(c)	3-014(q)	6-007(b)	9-004(l)	11-005(a)
1-006(d)	3-014(r)	6-007(c)	9-004(m)	11-005(b)
1-006(h)	3-014(s)	6-007(d)	9-004(n)	11-005(c)
1-006(n)	3-014(t)	6-007(e)	9-004(o)	11-006(a)
1-006(o)	3-014(u)	6-007(f)	9-005(a)	11-006(b)
1-007(a)	3-015	6-007(g) (19)	9-005(d)	11-006(c)
1-007(b)	3-026(d)		9-005(g)	11-006(d)
1-007(c)	3-028	Technical Area 7	9-006	11-009
1-007(d)	3-033	7-001(a)	9-008(b)	11-011(a)

TABLE A

11-011(b)	15-009(c)	16-005(n)	18-001(c)	21-010(g)
11-011(d) (20)	15-009(e)	16-006(a)	18-002(a)	21-010(h)
	15-009(f)	16-006(c)	18-002(b)	21-011(a)
<u>Technical Area 12</u>	15-009(g)	16-006(d)	18-003(a)	21-011(b)
12-001(a)	15-009(h)	16-006(e)	18-003(b)	21-011(c)
12-001(b)	15-009(i)	16-007(a)	18-003(c)	21-011(d)
12-002 (3)	15-009(j)	16-008(a)	18-003(d)	21-011(e)
	15-009(k)	16-009(a)	18-003(e)	21-011(f)
<u>Technical Area 13</u>	15-010(a)	16-010(a)	18-003(f)	21-011(g)
13-001	15-010(b)	16-010(b)	18-003(g)	21-011(i)
13-002	15-010(c)	16-010(c)	18-003(h)	21-011(j)
13-003(a)	15-011(a)	16-010(d)	18-004(a)	21-011(k)
13-004 (4)	15-011(b)	16-010(e)	18-004(b)	21-012(b)
	15-011(c)	16-010(f)	18-005(a)	21-013(a)
<u>Technical Area 14</u>	15-012(a)	16-010(h)	18-012(a)	21-013(b)
14-002(a)	15-012(b)	16-010(i)	18-012(b) (18)	21-013(c)
14-002(b)	15-014(a)	16-010(j)		21-013(d)
14-002(c)	15-014(b)	16-010(k)	<u>Technical Area 19</u>	21-013(e)
14-002(d)	15-014(i)	16-010(l)	19-001	21-014
14-002(e)	15-014(j)	16-010(m)	19-002	21-015
14-002(f)	15-014(k)	16-010(n)	19-003 (3)	21-016(a)
14-003	15-014(l) (44)	16-013		21-016(b)
14-005		16-016(a)	<u>Technical Area 20</u>	21-016(c)
14-006	<u>Technical Area 16</u>	16-016(b)	20-001(a)	21-017(a)
14-007	16-001(a)	16-016(c)	20-001(b)	21-017(b)
14-009	16-001(b)	16-018	20-001(c)	21-017(c)
14-010 (12)	16-001(c)	16-019	20-002(a)	21-018(a)
	16-001(d)	16-020	20-002(b)	21-018(b)
<u>Technical Area 15</u>	16-001(e)	16-021(a)	20-002(c)	21-021
15-002	16-003(a)	16-021(c)	20-002(d)	21-022(a)
15-003	16-003(b)	16-026(b)	20-003(a)	21-022(b)
15-004(a)	16-003(c)	16-026(c)	20-005 (9)	21-022(c)
15-004(b)	16-003(d)	16-026(d)		21-022(d)
15-004(c)	16-003(e)	16-026(e)	<u>Technical Area 21</u>	21-022(e)
15-004(f)	16-003(f)	16-026(h2)	21-002(a)	21-022(f)
15-004(g)	16-003(g)	16-026(j2)	21-003	21-022(g)
15-004(i)	16-003(h)	16-026(v)	21-004(b)	21-022(h)
15-006(a)	16-003(i)	16-029(a)	21-004(c)	21-022(i)
15-006(b)	16-003(j)	16-029(b)	21-005	21-022(j)
15-006(c)	16-003(k)	16-029(c)	21-006(a)	21-023(a)
15-006(d)	16-003(l)	16-029(d)	21-006(b)	21-023(b)
15-007(a)	16-003(m)	16-029(e)	21-006(c)	21-023(c)
15-007(b)	16-003(n)	16-029(f)	21-006(d)	21-023(d)
15-007(c)	16-003(o)	16-029(g)	21-006(e)	21-024(a)
15-007(d)	16-004(a)	16-030(h)	21-007	21-024(b)
15-008(a)	16-004(b)	16-035	21-010(a)	21-024(c)
15-008(b)	16-004(c)	16-036 (74)	21-010(b)	21-024(d)
15-008(c)	16-004(d)		21-010(c)	21-024(e)
15-008(d)	16-004(e)	<u>Technical Area 18</u>	21-010(d)	21-024(f)
15-009(a)	16-004(f)	18-001(a)	21-010(e)	21-024(g)
15-009(b)	16-005(g)	18-001(b)	21-010(f)	21-024(h)

TABLE A

21-024(i)	33-002(a)	35-003(d)	36-003(b)	45-002
21-024(j)	33-002(b)	35-003(e)	36-004(d)	45-003
21-024(k)	33-002(c)	35-003(f)	36-005	45-004 (4)
21-024(l)	33-002(d)	35-003(g)	36-006	
21-024(n)	33-002(e)	35-003(h)	C-36-003 (8)	Technical Area 46
21-024(o)	33-003(a)	35-003(j)		46-002
21-026(a)	33-003(b)	35-003(k)	Technical Area 39	46-003(a)
21-026(b)	33-004(a)	35-003(l)	39-001(a)	46-003(b)
21-027(a)	33-004(b)	35-003(m)	39-001(b)	46-003(c)
21-027(c)	33-004(c)	35-003(n)	39-002(a)	46-003(d)
21-027(d)	33-004(d)	35-003(o)	39-004(a)	46-003(e)
21-029 (80)	33-004(g)	35-003(p)	39-004(b)	46-003(f)
	33-004(h)	35-003(q)	39-004(c)	46-003(g)
Technical Area 22	33-004(i)	35-004(a)	39-004(d)	46-003(h)
22-010(a)	33-004(j)	35-004(b)	39-004(e)	46-004(a)
22-010(c)	33-004(k)	35-004(g)	39-005	46-004(b)
22-011	33-004(m)	35-004(h)	39-006(a)	46-004(c)
22-012	33-005(a)	35-008	39-007(a)	46-004(d)
22-014(a)	33-005(b)	35-009(a)	39-008 (12)	46-004(e)
22-014(b)	33-005(c)	35-009(b)		46-004(f)
22-015(a)	33-006(a)	35-009(c)	Technical Area 40	46-004(g)
22-015(b)	33-006(b)	35-009(d)	40-001(b)	46-004(h)
22-015(c)	33-007(a)	35-009(e)	40-001(c)	46-004(a2)
22-015(d)	33-007(b)	35-010(a)	40-003(a)	46-004(b2)
22-015(e)	33-007(c)	35-010(b)	40-004	46-004(c2)
22-016 (12)	33-008(a)	35-010(c)	40-005	46-004(d2)
	33-008(b)	35-010(d)	40-006(a)	46-004(m)
Technical Area 26	33-009	35-013(a)	40-006(b)	46-004(p)
26-001	33-010(a)	35-013(b)	40-006(c)	46-004(q)
26-002(a)	33-010(b)	35-013(c)	40-009	46-004(r)
26-002(b)	33-010(c)	35-013(d)	40-010 (10)	46-004(s)
26-003 (4)	33-010(d)	35-014(b)		46-004(t)
	33-010(f)	35-014(e)	Technical Area 41	46-004(u)
Technical Area 27	33-010(g)	35-014(g)	41-001	46-004(v)
27-002	33-010(h)	35-015(a)	41-002(a)	46-004(w)
27-003 (2)	33-011(a)	35-015(b)	41-002(b)	46-004(x)
	33-011(c)	35-016(a)	41-002(c) (4)	46-004(y)
Technical Area 31	33-011(d)	35-016(c)		46-004(z)
31-001 (1)	33-011(e)	35-016(d)	Technical Area 42	46-005
	33-012(a)	35-016(i)	42-001(a)	46-006(a)
Technical Area 32	33-013	35-016(k)	42-001(b)	46-006(b)
32-001	33-014	35-016(m)	42-001(c)	46-006(c)
32-002(a)	33-015	35-016(o)	42-002(b)	46-006(d)
32-002(b) (3)	33-016	35-016(p)	42-003 (5)	46-006(f)
	33-017 (50)	35-016(q) (49)		46-006(g)
Technical Area 33			Technical Area 43	46-007
33-001(a)	Technical Area 35		43-001(a)	46-008(a)
33-001(b)	35-002	Technical Area 36	43-002 (2)	46-008(b)
33-001(c)	35-003(a)	36-001		46-008(d)
33-001(d)	35-003(b)	36-002	Technical Area 45	46-008(e)
33-001(e)	35-003(c)	36-003(a)	45-001	46-008(f)

TABLE B PRIORITY SWMUS*

SWMU Numbers	11-004(d)	16-006(d)	21-011(e)	35-010(b)
1-001(a)	11-004(e)	16-006(e)	21-011(f)	35-010(c)
1-001(b)	11-005(a)	16-007	21-011(g)	35-010(d)
1-001(c)	11-005(b)	16-008(b)	21-011(h)	36-003(a)
1-001(d)	11-006(a)	16-016	21-011(i)	36-003(b)
1-001(e)	13-004	16-018	21-014	39-001(a)
1-001(f)	15-002	16-019	21-015	39-001(b)
1-001(g)	15-006(a)	16-020	21-016(a)	41-001
1-001(m)	15-006(b)	16-021(a)	21-017(a)	46-002
1-002	15-006(c)	18-001(a)	21-017(b)	46-006(a)
1-003(a)	15-006(d)	18-003(a)	21-017(c)	46-006(b)
2-005	15-007(a)	18-003(b)	21-018(a)	46-006(c)
2-008(a)	15-007(b)	18-003(c)	21-018(b)	46-006(d)
3-010(a)	15-007(c)	18-003(d)	22-015(c)	46-007
3-012(b)	15-007(d)	18-003(e)	33-002(a)	49-001(a)
3-013(a)	15-008(a)	18-003(f)	33-002(b)	50-006(a)
3-015	15-008(b)	18-003(g)	33-002(c)	50-006(c)
3-029(a)	15-008(c)	18-003(h)	33-017	50-006(d)
5-005(a)	15-008(d)	21-006(a)	35-003(a)	50-009
6-007(a)	15-009(a)	21-006(b)	35-003(b)	54-004 (except Shaft No. 9)
8-003(a)	15-009(b)	21-006(c)	35-003(c)	
9-008(a)	15-012(a)	21-006(d)	35-003(d)	54-005
9-008(b)	15-012(b)	21-006(e)	35-003(e)	60-005(a)
9-009	15-012(c)	21-010(a)	35-003(f)	73-001(a)
9-013	15-012(d)	21-010(b)	35-003(g)	
10-003(a)	15-012(e)	21-010(c)	35-003(h)	Total SWMUs in Table B = 164 162
10-003(b)	15-012(f)	21-010(d)	35-003(j)	
10-003(c)	15-012(g)	21-010(e)	35-003(k)	• As RFI work progresses, NMED may identify more SWMUs to be added to the list to be addressed in the installation workplans.
10-003(d)	16-001(b)	21-010(f)	35-003(l)	
10-003(e)	16-001(c)	21-010(g)	35-003(m)	
10-003(f)	16-001(d)	21-010(h)	35-003(n)	
10-006	16-001(e)	21-011(a)	35-003(o)	
11-004(a)	16-005(n)	21-011(b)	35-003(p)	
11-004(b)	16-006(a)	21-011(c)	35-003(q)	
11-004(c)	16-006(c)	21-011(d)	35-010(a)	

**Table B.1
No Further Action
SWMUs removed from Table B through a Class III Permit Modification and date of removal**

0-005	12-23-98	1-001(n)	12-23-98	16-005(o)	12-23-98	54-015(h) *
1-001(h)	12-23-98	3-012(a)	12-23-98	16-006(f)	12-23-98	
1-001(i)	12-23-98	3-020(a)	12-23-98	21-012(a)	12-23-98	Total SWMUs removed from Table B=19
1-001(j)	12-23-98	8-003(b)	12-23-98	35-003(i)	12-23-98	
1-001(k)	12-23-98	8-003(c)	12-23-98	35-006	*	
1-001(l)	12-23-98	8-007	12-23-98	36-003(c)	12-23-98	

*date will be added to the table after final approval of this permit modification

TABLE C

**RFI Work Plan due July 7, 1994:
Technical Area 16**

16-005(a)
16-005(c)
16-005(d)
16-005(e)
16-005(h)
16-005(j)
16-005(k)
16-005(l)
16-005(m)
16-006(g)
16-006(h)
16-015(a)
16-015(b)
16-017
16-024(e)
16-025(a)
16-025(b)
16-025(b2)
16-025(c2)
16-025(d)
16-025(e)
16-025(f)
16-025(g)
16-025(h)
16-025(i)
16-025(j)
16-025(k)
16-025(l)
16-025(m)
16-025(n)
16-025(o)
16-025(p)
16-025(q)
16-025(r)
16-025(s)
16-025(t)
16-025(u)

16-025(v)
16-025(w)
16-025(x)
16-025(y)
16-025(z)
16-026(m)
16-026(n)
16-026(o)
16-026(p)
16-026(q)
16-026(s)
16-026(w)
16-028(a)
16-029(a2)
16-029(b2)
16-029(c2)
16-029(d2)
16-029(e2)
16-029(f2)
16-029(g2)
16-029(h2)
16-029(k)
16-029(l)
16-029(m)
16-029(n)
16-029(o)
16-029(p)
16-029(q)
16-029(r)
16-029(s)
16-029(t)
16-029(u)
16-029(v)
16-029(w)
16-029(x)
16-029(y)
16-029(z)
16-031(c)
16-031(d)

16-032(a)
16-032(c)
16-034(a)
16-034(b)
16-034(c)
16-034(d)
16-034(e)
16-034(f)
16-034(l)
16-034(m)
16-034(n)
16-034(o)
16-034(p)
C-16-025
C-16-026
* Total
SWMUs = 91
RFI Work Plan due July 7, 1995:
Technical Area 16
16-016(d)
16-016(e)
16-016(g)
16-025(a2)
16-025(d2)
16-025(e2)
16-025(f2)
16-025(h2)
16-026(a)
16-026(a2)
16-026(b2)
16-026(c2)
16-026(d2)
16-026(e2)
16-026(f)
16-026(f2)
16-026(g)
16-026(g2)
16-026(h)
16-026(i)

16-026(j)
16-026(k)
16-026(k2)
16-026(l)
16-026(r)
16-026(t)
16-026(u)
16-026(x)
16-026(y)
16-026(z)
16-028(b)
16-028(c)
16-028(d)
16-028(e)
16-029(h)
16-029(i)
16-029(j)
16-030(a)
16-030(b)
16-030(c)
16-030(e)
16-030(f)
16-031(a)
16-031(b)
16-031(e)
16-031(f)
16-031(h)
16-034(h)
16-034(i)
16-034(j)
16-034(k)
Total SWMUs = 51
RFI Work Plan due May 21, 1995:
Operable Unit 1114
3-009(i)
3-009(j)
3-011
3-021
3-025(b)

3-026(c)
3-029
3-031
3-034(a)
3-034(b)
3-043(c)
3-045(a)
3-045(b)
3-045(c)
3-045(e)
3-045(f)
3-045(g)
3-045(h)
3-046
3-049(a)
3-049(b)
3-049(e)
3-050(a)
3-050(d)
3-050(f)
3-050(g)
3-052(a)
3-052(e)
3-052(f)
3-054(a)
3-054(b)
3-054(c)
3-054(d)
3-054(e)
3-055(a)
3-055(c)
3-056(d)
3-056(l)
3-059
Total SWMUs = 39

* 20 additional SWMUs were added after workplan review

TABLE C

**Table C.1
No Further Action
SWMUs removed from Table C through a Class III Permit Modification and date of removal**

3-002(a) *		3-045(d) 12-08-97	3-056(n) *	16-032(d) 12-23-98
3-002(d) *		3-045(i) *	16-005(b) *	16-032(e) 12-23-98
3-009(c) *		3-049(c) *	16-005(f) 12-23-98	16-034(g) 12-23-98
3-019 *		3-049(d) *	16-006(i) 12-23-98	
3-024	12-08-97	3-050(e) *	16-025(c) 12-23-98	Total SWMUs removed
3-025(a) *		3-052(c) *	16-025(g2) 12-23-98	=27
3-026(b) *		3-055(d) *	16-026(i2) 12-23-98	
3-032 *		3-056(m) *	16-031(g) 12-23-98	

*date will be added to the table after final approval of this permit modification

FACT SHEET
November 22, 2000

**NOTICE OF INTENT
TO APPROVE A MODIFICATION TO
RCRA PERMIT NO. NM0890010515
US DEPARTMENT OF ENERGY/LOS ALAMOS NATIONAL LABORATORY
NEW MEXICO**

Action: Approval, subject to public review and input, of a Class III permit modification to remove thirty (30) Solid Waste Management Units (SWMUs) from a RCRA permit.

Permittee: US Department of Energy/Los Alamos National Laboratory (DOE/LANL), New Mexico

Permit No.: NM0890010515

Reason for Action:

The proposed modification will remove thirty (30) SWMUs from Table A, Table B, and Table C of the permit. Tables A, B, and C list sites at LANL where Corrective Action to characterize and/or remediate past releases of hazardous waste or hazardous waste constituents may be necessary.

On March 27, 1995, September 28, 1995 and September 30, 1996 DOE/LANL proposed one-hundred ninety (190) SWMUs for No Further Action (NFA). At this time, the New Mexico Environment Department (NMED) has approved and removed one hundred two (102) sites from DOE/LANLs permit and has further identified thirty (30) sites as appropriate for NFA. The thirty (30) sites proposed for NFA in this action and justification for removal of these sites from LANL's permit are:

The following SWMUs are approved for NFA because they cannot be located or have been shown not to exist:

SWMU 3-025(a)	Oil trap sump	TA-3 (Former Operable Unit 1114)
SWMU 3-045(i)	Outfall	TA-3 (Former Operable Unit 1114)
SWMU 11-011(c)	Boiler discharge/Outfall	TA-11 (Former Operable Unit 1082)
SWMU 18-007	Buried Armored Vehicle	TA-18 (Former Operable Unit 1093)
SWMU 27-001	Buried Naval Guns	TA-27 (Former Operable Unit 1093)
SWMU 59-001	Decommissioned Septic system	TA-59 (Former Operable Unit 1114)

The following SWMU is approved for NFA because it is a duplicate SWMU:

SWMU 3-049(c)	Outfall (Active)	TA-3 (Former Operable Unit 1114)
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The following SWMU is approved for NFA because it will be evaluated as part of another SWMU investigation:

SWMU 3-052(c)	One time Release	TA-3 (Former Operable Unit 1114)
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The following SWMUs are approved for NFA because they have never been used for the management of RCRA solid or hazardous wastes and/or constituents:

SWMU 3-002(d)	Former Storage Area	TA-3 (Former Operable Unit 1114)
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SWMU 3-009(c)	Construction debris Area	TA-3 (Former Operable Unit 1114)
SWMU 3-009(g)	Soil Fill Area	TA-3 (Former Operable Unit 1114)
SWMU 3-019	Septic Tank	TA-3 (Former Operable Unit 1114)
SWMU 3-049(d)	Outfall (Active)	TA-3 (Former Operable Unit 1114)
SWMU 3-050(e)	Inactive Filter Unit	TA-3 (Former Operable Unit 1114)
SWMU 3-055(d)	Active Storm Drain	TA-3 (Former Operable Unit 1114)
SWMU 3-056(m)	Inactive Drum Storage Area	TA-3 (Former Operable Unit 1114)
SWMU 16-005(b)	Septic System (Removed)	TA-16 (Former Operable Unit 1082)
SWMU 54-007(b)	Inactive Septic System	TA-54 (Former Operable Unit 1148)
SWMU 61-004(a)	Former Septic Tank	TA-61 (Former Operable Unit 1114)

The following SWMUs are approved for NFA because they were proven to have made no release to the environment:

SWMU 3-026(b)	Active Sumps	TA-3 (Former Operable Unit 1114)
SWMU 3-032	Tank and Associated Equipment	TA-3 (Former Operable Unit 1114)
SWMU 3-044(a)	Container Storage Area	TA-3 (Former Operable Unit 1114)
SWMU 3-056(n)	Container Storage Area	TA-3 (Former Operable Unit 1114)
SWMU 35-011(a)	Aboveground Storage Tanks	TA-35 (Former Operable Unit 1129)
SWMU 35-013(d)	Floor Drains	TA-35 (Former Operable Unit 1129)
SWMU 54-015(h)	Drum Storage Area	TA-54 (Former Operable Unit 1148)

The following SWMU is approved for NFA because it is regulated under another authority:

SWMU 35-004(e)	Active Satellite Accumulation Area	TA-35 (Former Operable Unit 1129)
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The following SWMUs are approved for NFA because they were characterized and/or remediated under another authority that adequately addressed corrective action:

SWMU 3-002(a)	Less-than-ninety-day	TA-3 (Former Operable Unit 1114)
SWMU 3-043(e)	Underground Storage Tank	TA-3 (Former Operable Unit 1114)
SWMU 35-006	Surface Impoundment	TA-35 (Former Operable Unit 1082)

Availability of Additional Information:

A Statement of Basis has been prepared to provide additional information on site history, evaluation of relevant investigations, and basis for the decision to approve NFA status. The administrative record for this proposed action consists of this fact sheet, NMED's statement of basis, the public notice, the proposed revised Tables A, B, and C, and a summary of public involvement activities. The administrative record may be reviewed at:

New Mexico Environment Department
Hazardous Waste Bureau
P.O. Box 26110
2044-A Galisteo Street
Santa Fe, New Mexico 87502
(505) 827-1557
Monday through Friday 8:00 a.m. to 5 p.m.
Attn: Mr. John Kieling

The public notice, fact sheet, NMED's Statement of Basis, and modified permit may also be reviewed at:

Los Alamos National Laboratory Community Relations Reading Room
1619 Central Avenue
Los Alamos, New Mexico 87545
(505) 665-4400
Monday through Friday 8:00 a.m. to 5 p.m.

To obtain a copy of the administrative record or any part thereof, please contact Mr. John Kieling at the New Mexico Environment Department at the above address. Any person who wishes to comment on this permit modification or to request a public hearing should submit written comments/requests, along with the commentor's/requester's name and address, to John Kieling at the above address. Requests for hearing should include a statement of the nature of the issues proposed. Only comments/requests received by 5:00 p.m. on **January 8, 2001** will be accepted. NMED will provide a 30-day notice of the public hearing, if scheduled.

Final Decision:

All written comments received during the public notice period and issues raised at a Public Hearing, if held, will become part of the administrative record and will be considered in formulating the final decision. NMED may approve, modify and approve, or deny the requested permit modification based on the comments received. NMED will notify DOE/LANL and each person who submitted a written comment during the public comment period or testimony at a Public Hearing of the final decision, including any approved change to the proposed modification, and a detailed statement of reasons for any such change. The final decision will be made according to applicable State and Federal laws.

PUBLIC NOTICE NO. 00-13

**NEW MEXICO ENVIRONMENT DEPARTMENT
HAZARDOUS WASTE BUREAU
Santa Fe, New Mexico 87502
November 22, 2000**

**NOTICE OF INTENT
TO APPROVE A MODIFICATION TO RCRA PERMIT NO. NM0890010515
US DEPARTMENT OF ENERGY/LOS ALAMOS NATIONAL LABORATORY
NEW MEXICO**

The State of New Mexico was authorized in 1986 to operate a hazardous waste management program in lieu of the Federal program for those portions of the Resource Conservation and Recovery Act (RCRA) in effect prior to the enactment of the Hazardous and Solid Waste Amendments of 1985 (HSWA). On January 2, 1996, the State was authorized to operate a hazardous waste management program for parts of HSWA. HSWA imposes additional Corrective Action requirements on hazardous waste management facilities for releases to the environment.

Under authority of the New Mexico Hazardous Waste Act (Section 74-4-1 *et seq.*, NMSA 1978, as amended, 1992) and the New Mexico Hazardous Waste Management Regulations (20.4.1 NMAC), the New Mexico Environment Department (NMED) can approve or deny hazardous waste permits and closure plans, permit modifications, and amendments.

Under this authority, NMED intends to approve, pending public input into this decision, a modification to the RCRA permit issued to the US Department of Energy/Los Alamos National Laboratory (DOE/LANL), New Mexico, Permit No. NM0890010515. LANL is a contractor-operated research facility under the administration of DOE.

The proposed modification will remove thirty (30) Solid Waste Management Units (SWMUs) from Tables A, B, and C of the HSWA permit module. Tables A, B, and C list sites at LANL where Corrective Action to characterize and/or remediate past releases of hazardous wastes or hazardous waste constituents may be necessary. The basis for removal of these sites from the permit is approval of No Further Action (NFA) status. The thirty (30) sites proposed for NFA in this action and justification for removal of these sites from LANL's permit are:

The following SWMUs are approved for NFA because they are duplicate of another SWMU, or cannot be located or have been shown not to exist, or will be evaluated as part of another SWMU investigation: 3-025(a), Oil trap sump, Technical Area (TA) 3; 3-045(i), Outfall, TA-3; 3-049(c), Outfall (Active), TA-3; 3-052(c), One time Release, TA-3; 11-011(c), Boiler-Discharge/Outfall, TA-11; 18-017, Buried Armored Vehicle, TA-18; 27-001, Buried Naval Guns, TA-27; 59-001, Decommissioned Septic Systems, TA-59.

The following SWMUs are approved for NFA because they have never been used for the management of RCRA solid or hazardous wastes and/or constituents: 3-002(d), Former Storage Area, TA-3; 3-009(c), Construction debris Area, TA-3; 3-009(g), Soil Fill Area, TA-3; 3-019, Septic Tank, TA-3; 3-049(d), Outfall (Active), TA-3; 3-050(e), Inactive Filter Unit, TA-3; 3-055(d), Active Storm Drain, TA-3; 3-056(m), Inactive Drum Storage Area, TA-3; 16-005(b), Septic System (Removed), TA-16; 54-007(b), Inactive Septic System, TA-54; 61-004(a), Former Septic

Tank, TA-61.

The following SWMUs are approved for NFA because they were proven to have made no release to the environment: 3-026(b), Active Sumps, TA-3; 3-032, Tank and Associated Equipment, TA-3; 3-044(a), Container Storage Area, TA-3; 3-056(n), Container Storage Area, TA-3; 35-011(a), Above Ground Storage Tanks, TA-35; 35-013(d), Floor Drains, TA-35; 54-015(h), Drum Storage Area, TA-54.

The following SWMUs are approved for NFA because they are regulated under another authority or were characterized and/or remediated under another authority that adequately addressed corrective action: 3-002(a), Less-than-ninety-day Storage Area, TA-3; 3-043(e), Underground Storage Area, TA-3; 35-004(e), Active Satellite Accumulation Area, TA-35; 35-006, Surface Impoundment, TA-35.

The administrative record for this proposed action consists of a fact sheet, the statement of basis, the public notice, the proposed revised Tables A, B, and C, and a summary of public involvement activities. The administrative record may be reviewed from 8:00 a.m. to 5:00 p.m., Monday through Friday at:

New Mexico Environment Department
Hazardous Waste Bureau
P.O. Box 26110
2044-A Galisteo Street
Santa Fe, New Mexico 87502
(505) 827-1557

Attn: Mr. John Kieling

The fact sheet, statement of basis, public notice and proposed revised Tables A, B, and C may also be reviewed from 8:00 a.m. to 5:00 p.m., Monday through Friday at:

Los Alamos National Laboratory Community Relations Reading Room
1619 Central Avenue
Los Alamos, New Mexico 87545
(505) 665-4400

To obtain a copy of the administrative record or any part thereof, please contact Mr. John Kieling of NMED at the Galisteo address above. Any person who wishes to comment on this permit modification or to request a public hearing should submit written comments/requests, along with the commentor's/requester's name and address, to Mr. John Kieling at the above address. Requests for public hearing should include a statement of the nature of the issues proposed. Only comments/requests received by 5:00 p.m. **January 8, 2001** will be accepted. NMED will provide a 30-day notice of the public hearing, if scheduled.

All written comments submitted during public notice period and issues raised at a Public Hearing, if held, will become part of the administrative record and will be considered in formulating the final decision. NMED may approve, or modify and approve, the requested permit modification based on the comments received. NMED will notify DOE/LANL and each person who submitted a written comment during the public comment period or testimony at a Public hearing of the final decision, including any approved change to the proposed modification, and a detailed statement of reasons for any such change. The final decision will be made according to applicable State and Federal laws.

STATEMENT OF BASIS

**Approval of No Further Action
for Thirty (30) Solid Waste Management Units (SWMUs)
U.S. Department of Energy
Los Alamos National Laboratory
Los Alamos, New Mexico
RCRA Permit No. NM0890010515**

The New Mexico Environment Department (NMED) has made a final determination to approve the US Department of Energy/Los Alamos National Laboratory (DOE/LANL) request to remove thirty (30) Solid Waste Management Units (SWMUs) from the Hazardous and Solid Waste Amendments (HSWA) Corrective Action module. This module is part of the DOE/LANL Resource Conservation and Recovery Act (RCRA) permit, No. NM0890010515.

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 1940s. It is 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

The U.S. Environmental Protection Agency (EPA) issued a Hazardous and Solid Waste Amendment (HSWA) Module VIII to the RCRA Hazardous Waste Facility permit on March 8, 1990. The effective date for the permit module was May 23, 1990. The original RCRA permit required investigation of 603 SWMUs. Additional SWMUs have been added to the RCRA permit by other permit modifications comprising a total of approximately 1000 SWMUs requiring investigation under the RCRA corrective action process. On January 2, 1996, NMED received authorization for Corrective Action and is consequently the Administrative Authority (AA) for this action.

On March 27, 1995, DOE/LANL submitted a request to remove 89 SWMUs from its HSWA corrective action module. After review of the request, NMED removed 59 SWMUs from the permit on December 23, 1998. The remaining 30 SWMUs were evaluated with additional information provided by DOE/LANL, and 12 SWMUs were determined to be appropriate for no further action (NFA). The remaining (18) SWMUs will be the subject of further study and or investigation.

On September 28, 1995, DOE/LANL submitted an additional request to remove 59 SWMUs from its HSWA corrective action module. After review of the request, NMED removed 38 SWMUs from the permit on December 23, 1998. The remaining 21 SWMUs were evaluated with additional information provided by DOE/LANL, 1 SWMU was determined to be appropriate for NFA. The remaining (20) SWMUs will be the subject of further study and or investigation.

On September 30, 1996, DOE/LANL submitted an additional request to remove 42 SWMUs from its HSWA corrective action module. NMED reviewed the request, 3 SWMUs were removed from the permit on December 8, 1997, additional 2 SWMUs were removed on December 23, 1998. After evaluation of additional information provided by DOE/LANL, 17 SWMUs were determined to be appropriate for NFA. The remaining (20) SWMUs will be the subject of further study and or investigation.

In summary, DOE/LANL has cumulatively requested through these three submittals a total of 190 SWMUs for NFA. NMED has reviewed these requests and has determined that 30 SWMUs (in addition to 102 SWMUs previously approved for NFA and removed from the permit) are appropriate for NFA. The remaining (58) SWMUs will be the subject of further study and or investigation.

C. INVESTIGATION RESULTS

During investigation of the SWMUs at LANL, it was determined that certain sites were identified as SWMUs that never handled hazardous waste including hazardous constituents regulated under RCRA. Other SWMUs were duplicates of other sites, or were included in investigations of other SWMUs. These are some of the types of SWMUs that DOE/LANL requested for NFA in their requests for Class 3 permit modifications dated March 27, 1995, September 28, 1995, and September 30, 1996. NFA criteria were developed and employed during the SWMU investigations. The 190 SWMUs proposed for NFA are categorized based on these NFA criteria. At this time, NMED has identified thirty (30) of these sites as appropriate for NFA. Brief descriptions of each of the SWMUs proposed for NFA are included in Section I. A more detailed description can be found in the March and September 1995 and September 1996 Requests for Permit Modification from LANL or in LANL's RCRA Facility Investigation Work Plans as referenced in the permit modification requests. Additional references are included in Section J, Supporting Documentation.

D. PERMIT MODIFICATION

The administrative record for this proposed action consists of a public notice, a fact sheet, NMED's Statement of Basis, the Requests for Permit Modification, RFI Reports, related correspondence and documents and the modified permit. The administrative record may be reviewed Monday through Friday from 8:00 a.m. to 5:00 p.m. at:

New Mexico Environment Department
Hazardous Waste Bureau
2044-A Galisteo
Santa Fe, New Mexico 87505
(505) 827-1557
Attn: Mr. John Kieling

The public notice, a fact sheet, NMED's Statement of Basis, and the modified permit may also be reviewed Monday through Friday from 8:00 a.m. to 5:00 p.m. at:

LANL's Community Relations Reading Room
1619 Central Avenue
Los Alamos, New Mexico 87545
(505) 665-4400

E. SELECTED REMEDY

NMED's determination that no further action is required at these SWMUs is based on sampling and analytical data, field surveys, historical records, aerial photographs, and employee interviews that show no or insignificant release(s) of hazardous wastes to the environment. The determination is based on the following criteria:

1. The site does not exist; is a duplicate of another site; cannot be located; or is located within another site and has been or will be, investigated as part of that site.
2. The site was never used for the management (that is, generation, treatment, storage or disposal) of RCRA solid or hazardous wastes and/or constituents.
3. The SWMU is not known or suspected of releasing RCRA solid or hazardous wastes and/or constituents to the environment. The term "release" 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. The SWMU is regulated under another state and/or federal authority. If the SWMU is known or suspected of releasing RCRA solid or hazardous wastes and/or constituents to the environment, it has been or will be investigated and/or remediated in accordance with the applicable state and/or federal regulation.

5. The SWMU was characterized or remediated in accordance with applicable state and/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 in Section I.

F. PUBLIC PARTICIPATION

Public notification is required by the New Mexico Hazardous Waste Management Regulations, 20.4.1.901 NMAC. Upon submittal of a request for permit modification, a facility is required to publish a notice in a local newspaper and send notices to all persons on the facility mailing list maintained by NMED. This notice announces a 60-day comment period for the request for permit modification and indicates the time, date, and place where a public meeting is to be held. Comments made during the public comment period are addressed to NMED for consideration during the review process. Upon review of the request for permit modification by NMED, a list of SWMUs that are deemed appropriate for NFA must be published in a local newspaper and public notices must be sent to all persons on the facility mailing list. As part of this process, the public may make comments to and/or request additional information from NMED during a 45-day public comment period.

Due to the fact that three requests for permit modification was submitted by DOE/LANL to NMED, the facility was required by regulations to hold three separate public meetings. These public meetings were held as indicated:

A public meeting was held by DOE/LANL on May 9, 1995, at the Pojoaque High School Gymnasium, Pojoaque, New Mexico, regarding the March 1995 Request for Permit Modification. Approximately fifty people attended the meeting, including representatives from DOE, LANL, NMED, and EPA. NMED and EPA are not aware of any written comments regarding the March 1995 request.

A public meeting was held by DOE/LANL on October 25, 1995, at the Sweeney Convention Center (Room 1), Santa Fe, New Mexico, regarding the September 1995 Request for Permit Modification. Approximately fifty people attended the meeting, including representatives from DOE, LANL, and NMED. NMED and EPA are not aware of any written comments regarding the September 1995 request.

A public meeting was held by DOE/LANL on November 7, 1996, at the Sweeney Convention Center, Santa Fe, New Mexico, regarding the September 1996 Request for Permit Modification. Fourteen people attended the meeting, including representatives from DOE, LANL, and NMED. No written comments regarding this document have been forwarded to NMED.

NMED issued a Public Notice on November 22, 2000, to announce the beginning of a 45-day comment period that will end at 5:00 p.m. on January 8, 2001.

G. NEXT STEPS

NMED will issue response to comments received during the public comment period and notify DOE/LANL 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 the decision, unless a later date is specified or review is requested under the New Mexico Hazardous Waste Management Regulations, 20.4.1 NMAC, Section 901.E., *Hearings*.

H. CONTACT PERSON FOR ADDITIONAL INFORMATION

John Kieling
New Mexico Environment Department
Hazardous Waste Bureau
2044-A Galisteo
Santa Fe, New Mexico 87505
(505) 827-1557

I. DESCRIPTION OF SWMUs PROPOSED FOR NO FURTHER ACTION

SWMUs proposed for NFA in March and September 1995 and September 1996

NFA Criterion 1. The site does not exist; is a duplicate of another site; cannot be located; or is located within another site and, has been or will be, investigated as part of that site.

**1-1 SWMU 03-025(a) Oil Trap Sump, TA-3
(Former Operable Unit 1114)**

SWMU 3-025(a) was initially identified as an oil trap sump that connected a steam cleaning drain from the machine shop in Building TA-3-34 to a drain line that discharged to the radioactive wastewater treatment facility at TA-50. However, field investigations and archival information do not indicate the presence of an oil trap sump associated with the steam cleaning drain. In addition, all sinks and drain lines from this building discharge either to the sanitary wastewater treatment facility at TA-3 or to the radioactive wastewater treatment facility at TA-50. SWMU 3-025(a) is appropriate for NFA under Criterion 1 because it does not exist.

1-2 SWMU 3-045(i) Outfall, TA-3 (Former Operable Unit 1114)

SWMU 3-045(i) was initially identified as an outfall from floor and sink drains at TA-3-34, the Cryogenics Building. However, field investigations and engineering drawings revealed that no outfall is associated with these drains which discharge directly to the sanitary sewer system. In addition, all sinks and drain lines from this building discharge either to the sanitary wastewater treatment facility at TA-3 or to the radioactive wastewater treatment facility at TA-50. SWMU 3-045(i) is appropriate for NFA under Criterion 1 because the outfall does not exist.

1-3 SWMU 3-049(c) Outfall (Active), TA-3 (Former Operable Unit 1114)

SWMU 3-049(c) is described as an outfall receiving "discharge from the condensate system" at Building TA-3-66, the Sigma Building. An associated SWMU, 3-049(d), is described as the "discharge of condensate from the flash tanks" at Building TA-3-66. The description of SWMU 3-049(d) includes all components of the TA-3-66 condensate system. Therefore, SWMU 3-049(c) is a duplicate of SWMU 3-049(d) and is appropriate for NFA under Criterion 1.

1-4 SWMU 3-052(c) One-time Release, TA-3 (Former Operable Unit 1114)

SWMU 3-052(c) is a one-time release of approximately 20 gallons of hydraulic oil that occurred in 1986. The oil was drained from the security gate on Mercury Road into an adjacent storm sewer near Building TA-3-42. The oil flowed down the storm drain, exited at outfall SWMU 3-045(a), and contaminated the soil in the immediate vicinity of the outfall. The contaminated soil resulting from the spill was located within the boundaries of SWMU 3-045(a).

Because, SWMU 3-052(c) is located within the boundaries of SWMU 3-045(a), it is appropriate for NFA under Criterion 1.

1-5 SWMU 11-011(c) Boiler Discharge/Outfall, TA-11 (Former Operable Unit 1082)

SWMU 11-011(c) was initially identified as the discharge from a boiler in Building TA-11-24. The boiler system reputedly discharged through a pipe that exited the building onto the surrounding asphalt pavement. However, field investigations and archival information do not indicate the presence of a boiler system discharge to the pavement outside the building. Therefore, SWMU 11-011(c) is appropriate for NFA under Criterion 1 because it does not exist.

1-6 SWMU 18-007 Buried Armored Vehicle, TA-18 (Former Operable Unit 1093)

SWMU 18-007 is an armored vehicle that was reportedly buried west of TA-18-32. Field investigations, including an extensive electromagnetic survey and archival information were unable to verify the burial of the armored vehicle at the suspected locations. SWMU 18-007 is appropriate for NFA under Criterion 1 because it cannot be located.

1-7 SWMU 27-001 Buried Naval Guns, TA-27 (Former Operable Unit 1093)

SWMU 27-001 consists of naval gun barrels that were reportedly buried in Pajarito Canyon. Field investigations, including an extensive electromagnetic survey and archival information were unable to verify the burial of the naval gun barrels at the suspected locations. SWMU 27-001 is appropriate for NFA under Criterion 1 because it cannot be located.

- 1-8 SWMU 59-001 Decommissioned Septic System, TA-59 (Former Operable Unit 1114)**
SWMU 59-001 is a decommissioned septic system (including a septic tank, associated piping and drain field) which served Buildings TA-59-1 and TA-59-3. The septic system was installed during the construction of TA-59-1 in 1964 and continued to serve both buildings until 1979. In 1979, the septic system was disconnected and removed when the buildings were connected to the new Laboratory-wide sanitary sewer waste line. Subsequent construction activities excavated and removed all soils in the area to a level well below the location of the former septic system. These activities would have removed any soil potentially contaminated from the septic system. Therefore, SWMU 59-001 is appropriate for NFA under Criterion 1 because it and the surrounding soil no longer exist.

NFA Criterion 2. The site was never used for the management (that is, generation, treatment, storage or disposal) of RCRA solid or hazardous wastes and/or constituents.

- 2-1 SWMU 3-002(d) Former Storage Area, TA-3 (Former Operable Unit 1114)**
SWMU 3-002(d) is a former drum storage area located in the paved parking lot southeast of Building TA-3-40, the Physics Building. Drums containing used dielectric fluid from electrical power supply units were stored at this SWMU from 1982 to 1986. The dielectric fluid contained no RCRA solid or hazardous wastes and/or constituents. Therefore, SWMU 3-002(d) is appropriate for NFA under Criterion 2.
- 2-2 SWMU 3-009(c) Construction Debris Area, TA-3 (Former Operable Unit 1114)**
SWMU 3-009(c) was initially identified as a "disturbed area south of TA-3-66 [the Sigma Building] and concrete building debris." Field investigations and archival information indicated the presence of fragments of concrete footings. This debris is not known or suspected of containing RCRA solid or hazardous wastes and/or constituents. Therefore, SWMU 3-009(c) is appropriate for NFA under Criterion 2.
- 2-3 SWMU 3-009(g) Soil Fill Area, TA-3 (Former Operable Unit 1114)**
SWMU 3-009(g) was initially identified as a large, soil fill area located south of the Two-Mile Canyon Bridge. Field investigations and archival information provide evidence that this SWMU was used only to stockpile road construction materials consisting of soil and tuff. Since 1979, the stockpile has been used to provide fill material for several additional Laboratory construction projects. Subsequently, only a small portion of fill remains. SWMU 3-009(g) is appropriate for NFA under Criterion 2 because it was never used for the management of RCRA solid or hazardous wastes and/or constituents.
- 2-4 SWMU 3-019 Septic Tank, TA-3 (Former Operable Unit 1114)**
SWMU 3-019 was a septic tank (TA-3-15) initially identified as serving the Van de Graaff Facility. However, engineering drawings and Laboratory building records indicate that the septic tank was never connected to the Van de Graaff Facility. The septic tank was removed in 1964. Because the septic tank was never connected to this facility, it was never used for the management of RCRA solid or hazardous wastes or constituents. Therefore, SWMU 3-019 is appropriate for NFA under Criterion 2.
- 2-5 SWMU 3-049(d) Outfall (Active), TA-3 (Former Operable Unit 1114)**
SWMU 3-049(d) is the condensate system for Building TA-3-66, the Sigma Building. Condensate (i.e., water) forms on the pipes of the system and is collected by pits beneath flash tanks. Because the pits are open to the atmosphere, they also receive rainwater. The pits discharge the condensate and rainwater to two National Pollutant Discharge Elimination System permitted outfalls. The condensate and the rainwater do not contain RCRA solid or hazardous wastes and/or constituents. Therefore, SWMU 3-049(d) is appropriate for NFA under Criterion 2.

- 2-6 SWMU 3-050(e) Inactive Filter Unit, TA-3 (Former Operable Unit 1114)**
SWMU 3-050(e) is an inactive filter unit located on the east side of machine shop, TA-3-39. The machine shop conducted general machining of non-hazardous materials including aluminum, steel, foam, plastics, and tool steels. The filter unit, which operated from 1953 until 1993, was used to remove non-hazardous grinding particulates from the ventilation system. The particulates were collected in a 55-gallon drum and were routinely picked up for recycling. SWMU 3-050(e) is appropriate for NFA under Criterion 2 because it was never used for the management of RCRA solid or hazardous wastes and/or constituents.
- 2-7 SWMU 3-055(d) Active Storm Drain, TA-3 (Former Operable Unit 1114)**
SWMU 3-055(d) was initially identified as an outfall pipe potentially associated with a sanitary sewer lift station located northwest of Building TA-3-41, a fire station. However, archival information and field investigations have demonstrated that this SWMU is a storm drain that channels storm water runoff from the fire station parking lot. SWMU 3-055(d) is appropriate for NFA under Criterion 2 because the storm drain was never used for the management of RCRA solid or hazardous wastes and/or constituents.
- 2-8 SWMU 3-056(m) Inactive Drum Storage Area, TA-3 (Former Operable Unit 1114)**
SWMU 3-056(m) was initially identified as a container storage area located outside TA-3-322, a supply building. This "storage area" was a single can, an open drum, and a pressed-board box that were used as trash receptacles. SWMU 3-056(m) is appropriate for NFA under Criterion 2 because it was never used for the management of RCRA solid or hazardous wastes and/or constituents.
- 2-9 SWMU 16-005(b) Septic System (Removed), TA-16 (Former Operable Unit 1082)**
SWMU 16-005(b) consists of a concrete septic tank associated drain line, distribution box and outfall. The SWMU was initially identified as being connected to Building TA-16-502 (a small steam facility). However, engineering drawing show the septic tank was connected to Building TA-16-142, a fire station that was built in 1945. The septic tank received only sanitary wastewater from the fire station. The septic tank was abandoned in place in 1955 and was removed sometime between September 1959 and August 1961. SWMU 16-005(b) is appropriate for NFA under Criterion 2 because it was never used for the management of RCRA solid or hazardous wastes and/or constituents.
- 2-10 SWMU 54-007(b) Inactive Septic System, TA-54 (Former Operable Unit 1148)**
SWMU 54-007(b) is an inactive septic system and associated seepage pit west of TA-54. The septic system was installed and permitted with the State of New Mexico in 1987. The septic tank served the lavatories of a transportable office building from 1987 until 1992. Sanitary wastewater from the toilets and sinks was the only discharge to the septic system. The septic system still remains in place for possible reuse to manage sanitary wastewater. SWMU 54-007(b) was never used for the management of RCRA solid or hazardous wastes and/or constituents and is, therefore, appropriate for NFA under Criterion 2.
- 2-11 SWMU 61-004(a) Former Septic Tank, TA-61 (Former Operable Unit 1114)**
SWMU 61-004(a) is an inactive septic tank located northeast of Building TA-61-23 (formerly designated as TA-3-282). Engineering drawings and archival records show that the septic tank received only sanitary waste from this building. During the 1950s, the building was used as a radio repair shop, in the 1960s as a shop for constructing museum exhibits and for project planning, and from the 1970s to the present, again as an audio repair shop. Engineering drawings and archival records confirm that the septic tank was abandoned in place in 1970. No documentation exists regarding the final disposition of the tank. SWMU 61-004(a) is appropriate for NFA under Criterion 2 because it was never used for the management of RCRA solid or hazardous wastes and/or constituents.

NFA Criterion 3. The SWMU is not known or suspected of releasing RCRA solid or hazardous wastes and/or constituents to the environment. The term "release" means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous constituents) into the environment.

- 3-1 SWMU 3-026(b) Active Sumps, TA-3 (Former Operable Unit 1114)**
SWMU 3-026(b) was initially identified as four active sumps in the basement of Building TA-3-132, the Computer Science Building. The four "sumps" are actually active sanitary lift stations that discharge to the

sanitary wastewater system. Field investigations conducted in 1992 found an additional sump/lift station. This sump/lift station no longer exists. The sumps/lift stations are metal-lined and embedded in the concrete foundation of Building TA-3-132. One sump/lift station potentially received spent photo-processing solutions (RCRA hazardous wastes). However, the SWMU is not known or suspected of releasing these substances to the environment because of its location within the concrete foundation. Therefore, SWMU 3-026(b) is appropriate for NFA under Criterion 3.

3-2 SWMU 3-032 Tank and Associated Equipment, TA-3 (Former Operable Unit 1114)

SWMU 3-032 is an aboveground, recirculation tank located in Building TA-3-38. The tank is used to control air emissions during the operation of a paint booth located adjacent to the tank. Air contaminated with paint particulates is pulled into a curtain of water that is passed through a filtration system to reduce the paint concentration in the water. The filtered water is then returned to the recirculation tank. Prior to 1987, the liquid in the tank was periodically discharged to floor drains connected to the former sanitary wastewater treatment facility at TA-3. The floor drains were plugged in 1987. Since that time, filtration water in the recirculation tank is replaced every two years. The water in the tank and the paint sludge from the bottom of the tank are put into separate drums, placed into the less-than-90-day waste accumulation in the building, characterized and sent to TA-54 for disposal. D&D will address potential releases from the floor drains. The drain lines have been rerouted to SWSC and remain active today. Potential releases from the drain lines will be investigated as part of a consolidated sanitary waste line PRS. The tank, itself, is not known or suspected of releasing contaminants to the environment. Therefore, SWMU 3-032 is appropriate for NFA under Criterion 3.

3-3 SWMU 3-044(a) Container Storage Area, TA-3 (Former Operable Unit 1114)

SWMU 3-044(a) was a container storage area on a concrete pad with secondary containment located southeast of TA-3-70, the Laboratory's Parks and Refuse Office. From the time of its construction in 1979 until 1987, the SWMU was used for the storage of wooden cable spools and drums containing waste diesel fuel, kerosene, and oil emulsion. From 1988 until its removal in 1993, the SWMU operated as a Satellite Accumulation Area (SAA). This SWMU is not known or suspected of releasing RCRA solid or hazardous wastes and/or constituents to the environment prior to the establishment of the SAA. Any release that may have occurred while it served as an SAA would have been remediated in accordance with 40 CFR 262, Standards Applicable to Generators of Hazardous Waste. Therefore, SWMU 3-044(a) is appropriate for NFA under Criteria 3.

3-4 SWMU 3-056(n) Container Storage Area, TA-3 (Former Operable Unit 1114)

SWMU 3-056(n) was a transfer area located outside and adjacent to Building TA-3-379, the JCI lead shop. The SWMU operated from the mid-1970s until 1988 when a less-than-90-day accumulation area was formally established within the building. Prior to 1988, lead cuttings from shop operations were accumulated in closed 55-gallon drums within the building and transferred to the SWMU prior to pick up for recycling. This SWMU is not known or suspected of releasing RCRA solid or hazardous wastes and/or constituents to the environment prior to the establishment of the less-than-90-day accumulation area. Any release, which may have occurred while it served as a less-than-90-day accumulation area, would have been remediated in accordance with 40 CFR 262, Standards Applicable to Generators of Hazardous Waste. Therefore, SWMU 3-056(n) is appropriate for NFA under Criterion 3.

3-5 SWMU 35-011(a) Aboveground Storage Tanks, TA-35 (Former Operable Unit 1129)

SWMU 35-011(a) was initially identified as two underground storage tanks located in the basement of Building TA-35-2. Field investigations and archival information indicate that the tanks were fiberglass, located above ground, and used for the containment of overflow from research laboratories located in the building. The contents of the tanks were periodically removed and transported to TA-50 for treatment. Before the removal of the tanks and associated lines in 1997, the alarm system on the tanks was tested and found to work properly. The SWMU is not known or suspected of releasing laboratory overflow to the environment because of its location and containment within the basement of the building. Therefore, SWMU 35-011(a) is appropriate for NFA under Criterion 3.

3-6 SWMU 35-013(d) Floor Drains, TA-35 (Former Operable unit 1129)

SWMU 35-013(d) was initially identified as four sumps located within Building TA-35-85. Field investigations and archival information indicate that the "sumps" were actually floor drains. All four drains channeled wash water from routine floor cleaning and sporadic operational releases of oils and solvents to an underground storage tank (UST) TA-35-158 [SWMU 35-012(a)] located directly outside the north end of Building TA-35-85. In 1991, the UST underwent removal and closure in accordance with New Mexico Hazardous Waste Regulations (RCRA closure). At the time of closure, all related piping located inside Building TA-35-85 was grouted in place and all related outside connections were sealed. Because it is not known to have released contaminants to the environment, SWMU 35-013(d) is appropriate for NFA under Criterion 3.

- 3-7 SWMU 54-015(h) Drum Storage Area, TA-54 (Former Operable Unit 1148)**
SWMU 54-015(h) is a drum storage area located inside Building TA-54-38, the Non-destructive Testing Facility. From 1988 to 1990, drums containing transuranic waste were stored at the facility prior to x-ray and neutron activation assay (non-destructive) testing. Swipe testing assured the integrity of each drum prior to placement in the storage area and no drums were ever opened within the building. The SWMU is not known or suspected of releasing contaminants to the environment. Therefore, SWMU 54-015(h) is appropriate for NFA under Criterion 3.

NFA Criterion 4. The SWMU is regulated under another state and/or federal authority. If the SWMU is known or suspected of releasing RCRA solid or hazardous wastes and/or constituents to the environment, it has been or will be investigated and/or remediated in accordance with the applicable state and/or federal regulations.

- 4-1 SWMU 3-002(a) Less-than-90-day Accumulation Area, TA-3 (Former Operable Unit 1114)**
SWMU 3-002(a) is a former less-than-90-day accumulation area located in Building TA-3-66, the Sigma Building. Less-than-90-day accumulation areas, such as SWMU 3-002(a), are hazardous waste accumulation areas that are regulated under 40 CFR 262, Standards Applicable to Generators of Hazardous Waste. Prior to its removal in 1995, the SWMU consisted of two, 250-gallon plastic tanks and several 55-gallon drums that were used for the accumulation of spent chemicals from an electroplating process. This SWMU was regulated under 40 CFR 262 and managed accordingly. Therefore, SWMU 3-002(a) is appropriate for NFA under Criterion 4.
- 4-2 SWMU 3-043(e) Underground Storage Tank, TA-3 (Former Operable Unit 1114)**
SWMU 3-043(e) was a 10,000 gallon diesel underground storage tank (UST) located at the former service station (Building TA-3-36) on Parry Road. The tank was installed in 1982 and removed with intent to upgrade in 1989. The UST, which did not leak, underwent removal and closure in accordance with the New Mexico UST regulations. Therefore, SWMU 3-043(e) is appropriate for NFA under Criterion 4.
- 4-3 SWMU 35-004(e) Active Satellite Accumulation Area, TA-35 (Former Operable Unit 1129)**
SWMU 35-004(e) is a satellite accumulation area (SAA) located in a laser laboratory in the basement of Building TA-35-2. SAAs, such as SWMU 35-004(e), are hazardous waste accumulation areas that are regulated under 40 CFR 262, Standards Applicable to Generators of Hazardous Waste. Spent laser dyes, methanol, toluene, and Kimwipes are accumulated in small containers for disposal. This SWMU is regulated under 40 CFR 262 and managed accordingly. Therefore, SWMU 35-004(e) is appropriate for NFA under Criterion 4.
- 4-4 SWMU 35-006 Surface Impoundment, TA-35 (Former Operable Unit 1129)**
SWMU 35-006 was an unlined waste-oil impoundment that was removed in 1985 and replaced by a RCRA-permitted impoundment, AOC 35-005(a). In 1989, AOC 35-005(a) was removed and remediated under an approved closure plan in accordance with 40 CFR 265. A final closure report was submitted to and approved by the regulatory authority. Because of their co-location, all remedial actions undertaken for AOC 35-005(a) also addressed potential contamination at SWMU 35-006. Therefore, SWMU 35-006 is appropriate for NFA under Criterion 4 because it was remediated in accordance with other applicable state and/or federal regulations.

J. SUPPORTING DOCUMENTATION

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Los Alamos National Laboratory, April 2000. "Supplemental Information in Support of NOD Responses for March 1995, September 1995, and September 1996, Requests for Permit Modification" Los Alamos National Laboratory Report LA-UR-00-1923, Los Alamos, New Mexico.