

1/31/2001

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**Department of Energy**

Albuquerque Operations Office  
Los Alamos Area Office  
Los Alamos, New Mexico 87544



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Carl Will, Permits Project Leader  
Permits Management Program  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
2044-A Galisteo Street  
Santa Fe, New Mexico 87502

Dear Mr. Will:

**Subject:** Response to Request for Additional Information (RAI), Administrative Completeness Review, RCRA Permit Renewal Application, Part A and General Part B, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515 (LA-UR-01-524)

The purpose of this letter is to provide the Department of Energy's (DOE) response to the RAI issued by the Hazardous Waste Bureau of the New Mexico Environment Department on November 20, 2000. The RSI requested additional information regarding a Resource Conservation and Recovery Act (RCRA) Part B permit application submitted to support the renewal of the LANL Hazardous Waste Facility Permit issued on November 8, 1989. The original document contained LANL facility-wide hazardous waste management plans and information and is entitled "*Los Alamos National Laboratory, General Part B Permit Application*," Revision 1.0, October 1998.

This submittal consists of a response to the eleven comments contained in the RAI. It also includes supplemental information attachments as referenced in the comment responses. A certification statement is provided for this document as a revision of the original permit application. An electronic copy of the revised section has also been included. The original submittal date for this document was amended to February 5, 2001 by your letter of January 26, 2001 approving the extension requested by LANL on January 9, 2001.

If you should have any questions or concerns regarding this submittal, please feel free to contact Gene Turner, DOE Los Alamos Area Office, at (505) 667-5794 or Gian Bacigalupa, LANL/University of California, at (505) 667-1579.

Sincerely,

David A. Gurulé, P.E.  
Area Manager

LAAME:3GT-002

Enclosures

cc:  
See page 2



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Mr. Carl Will

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LA-UR-01-524  
February 2001

**Response to Request for Additional Information:  
Administrative Completeness Review, RCRA  
Permit Renewal Application, Part A and General  
Part B, Los Alamos National Laboratory EPA ID No.  
NM0890010515**

Prepared by:

*Los Alamos National Laboratory  
Hazardous and Solid Waste Group (ESH-19)  
Los Alamos, New Mexico 87545*

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**Response to Request for Additional Information:  
Administrative Completeness Review, RCRA Permit  
Renewal Application, Part A and General Part B,  
Los Alamos National Laboratory  
EPA ID No. NM0890010515**

**LA-UR-01-524  
February 2001**

**Prepared by:  
Los Alamos National Laboratory  
Hazardous and Solid Waste Group (ESH-19)  
Los Alamos, New Mexico 87545**

Response to Request for Additional Information:

Administrative Completeness Review  
RCRA Permit Renewal Application  
Part A and General Part B  
Los Alamos National Laboratory  
EPA ID No. NM0890010515

Introduction

The following information is the Los Alamos National Laboratory (LANL) response to the Request for Additional Information (RAI), Attachment A, of the "Administrative Completeness Determination, Part A and General Part B RCRA Permit Application, Los Alamos National Laboratory, EPA ID No. NM 0890010515." This document was received by LANL from the Hazardous Waste Bureau (HWB) of the New Mexico Environment Department (NMED) on November 22, 2000. The request was dated November 20, 2000. The RAI asked for additional information for Resource Conservation and Recovery Act (RCRA) Part A and B permit applications submitted in accordance with the New Mexico Administrative Code, Title 20, Chapter 4, Part 1 (20.4.1 NMAC), Subpart IX, to support the renewal of the LANL Hazardous Waste Facility Permit originally issued on November 8, 1989. The Part B permit application contained general LANL facility-wide hazardous waste management plans and information and is titled "Los Alamos National Laboratory General Part B Permit Application," Revision 1.0, October 1998 (General Part B). The Part A permit application is titled "Los Alamos National Laboratory General Part A Permit Application," Revision 0.0, April, 1998.

This document consists of responses to the eleven comments or information requests contained in Attachment A of the RAI. It includes supplemental information attachments, as referenced in the comment responses. NMED's original comments are included in this document as italicized text. A numeric reference has been added to the original comments to aid future discussion. The response to General Part B Comment #7 is also presented with the individual 40 CFR §270.14(c) regulatory requirements in quotations.

*Submit the following:*

*Part A:*

- 1. Information on whether the Facility is located on Indian Lands. [40 CFR §270.13(f)]*

This information was provided in the "Los Alamos National Laboratory General Part A Permit Application," Revision 0.0, April 1998 (the LANL Part A), in the following manner: Section III.B of the Part A permit application form (EPA Form 8700-23) includes a provision for identifying the land type for the facility. Section III.B of the Part A form indicates "F" for "Federal" as the current legal status of the land on which the facility is located, as directed by the Part A instructions. Indian lands would be indicated by an "I" at that position. The proximity of Indian lands is also shown on Map 1 of the application and on the revision of Map 1 (see Part B Comment #4 below). The revised Map 1 is included in this response as Attachment A.

**2. Information on whether the Facility is new or existing and whether the Application is a first or revised Application. [40 CFR §270.13(g)]**

The LANL facility is an existing facility, as indicated in Section III.D of the LANL Part A. As indicated in Section I.B of the LANL Part A, the application is a revised application.

**3. A description of hazardous debris to be treated, stored, or disposed of at the Facility. [40 CFR §270.13(n)]**

The Part A instructions (revised October 1996) used to prepare the LANL Part A permit application do not contain specific guidance for the description of hazardous debris waste streams. The EPA Hazardous Waste Numbers and estimated annual quantities for hazardous debris waste streams at LANL are included in, but not separated from, the general categories provided in Section XIV of the LANL Part A. As discussed with the Permit Working Group (PWG) of the HWB on December 11, 2000, hazardous debris waste category descriptions are presented in Sections B.1.2.1, B.1.2.2, B.1.2.3, and B.1.3.2 of the Waste Analysis Plan, Appendix B, in the General Part B permit application.

**General Part B:**

**1. A legible flood plain map. [40 CFR §270.14(b)(11)(iii)]**

A legible floodplain map is provided in Attachment B of this submittal to supplement the floodplain map on page 36 in Supplement 5 of the General Part B. This map was developed from the same floodplain data used for the existing floodplain report in Supplement 5 of the permit application. An updated floodplain map will be provided, when developed, as part of a new floodplain report, as indicated in the response to NMED Comment #4 in the "Response to Request for Supplemental Information for the October 1998 General Part B Permit Application, Revision 1.0, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515" (LA-UR-00-4951), submitted to the NMED in October 2000.

**2. Identify all units which are now or are anticipated to be subject to post-closure care requirements. The General Part B Application, Appendix F, Section F.1.9, states only that hazardous waste and constituents will be removed from container storage units unless indicated otherwise. Include information about closed and operating land disposal units. [40 CFR §270.14(b)(13)]**

Several tables are included in Attachment C of this response to present categories of land disposal units at LANL that are or may be subject to post-closure care requirements or for which additional information has been requested during recent PWG meetings. These include regulated units, Subpart X units, units that have been clean closed or are in the process of closure, and a listing of other material disposal areas (MDA) at LANL. This response also includes a discussion of the current applicability of Appendix F of the General Part B.

Table C-1 in Attachment C of this response lists regulated units at LANL (i.e., "a surface impoundment, waste pile, and land treatment unit or landfill that receives hazardous waste after July 26, 1982..." that are required to meet the conditions of 40 CFR, Part 264, Subpart F, as applicable [40 CFR §264.90(a)(2)]. (Also see response to Part B

Comment #7). Information on the regulated unit type, dates of operation, and closure plan submittals are included in this table. Detailed post-closure requirement discussions for technical area (TA)-specific regulated units, as required by 40 CFR §270.14(b)(13), will become elements of permit applications used for the development of future post-closure chapters of the facility permit. This approach has been discussed with the PWG in order to meet the overall LANL permit strategy, as indicated in a letter received from the NMED (letter to Mr. Theodore Taylor [DOE] and Dr. James C. Brown (*sic*) [LANL] from Robert S. Dinwiddie [HRMB], "Proposed Permit Strategy, Los Alamos National Laboratory, NM0890010515," February 5, 1998).

Table C-2 in Attachment C includes 40 CFR, Part 264, Subpart X, treatment units at LANL that may be subject to post-closure care requirements and a post-closure care plan only if contaminated structures or media cannot be adequately removed or decontaminated during closure, as required by 40 CFR §264.603. The closure plans and procedures for these units support their intended clean closure through removal of hazardous waste and associated hazardous constituents, decontamination of structures and equipment associated within the unit, and, if necessary, cleanup of surrounding soil. If decontamination to the cleanup levels cannot be achieved, the plans state that the contaminated structures, equipment, or soil will be appropriately disposed or otherwise managed. Brief discussions regarding the need to develop post-closure care plans for these units in the event that adequate clean closure cannot be achieved have been included in the closure plans contained in the "Part B Permit Application, Open Burning/Open Detonation Units at Technical Areas 14, 15, 36, and 39," Revision 1.0, submitted in October 1997; the "Part B Permit Application, Technical Area 36 Open Detonation Unit," Revision 0.0, submitted in September 1999; the "Part B Permit Application, Technical Area 39 Open Detonation Unit," Revision 0.0, submitted in February 2000; and the "Los Alamos National Laboratory Technical Area 16 Part B Permit Renewal Document," Revision 3.0, submitted in January 2000. Additional discussion of post-closure notices has also been included for review in two draft closure plans for the TA-16 open burn unit, as referenced in the response to Part B Comment #3 below.

Table C-3 in Attachment C is being submitted only for informational purposes in response to discussions with the PWG. This table provides a list of LANL units that managed RCRA waste after the effective dates of regulation and have been clean closed or are in the process of closing where post-closure care requirements would apply if adequate clean closure cannot be achieved. The table provides information on unit type, operating dates, and closures. Storage and treatment tanks have been included to address the potential post-closure care requirements in 40 CFR §264.197(b). The TA-54, Area L, Waste Oil Storage Tanks are listed because contaminant residuals may still be present at MDA L, Impoundment D, although the tanks themselves were decontaminated and removed. The final action for these potential residuals was deferred until MDA L could be assessed as a complete unit, as discussed in the closure report submitted to the NMED in 1992. The MDA P landfill closure is currently proceeding towards clean closure. The other units listed in the table have achieved clean closure by removal of all waste, waste residues, contaminated containment system components, and contaminated subsoils, as required by their applicable closure plans.

Table C-4 of Attachment C is being submitted only for informational purposes in response to discussions with the PWG. This table lists MDAs at LANL that are not

subject to closure or post-closure care requirements and plans because: either the conclusion of operations at these units pre-date the effective date of regulation that would have subjected these units to interim status or permit requirements; or, hazardous or mixed waste was never managed at the MDA. These units are listed as Potential Release Sites (PRS) in the permit or consist of several PRSs: therefore; available detailed information regarding these units is contained in LANL ER Program documents, including the SWMU Report and numerous RFI Reports (see Table D-1 in Attachment D). Appropriate corrective action information and requirements will be developed for and contained in the permit as the corrective action chapter.

Appendix F is no longer included with the General Part B as a result of discussions with the HWB. The appendix was intended to provide general and LANL facility-wide closure information and to supplement closure plans in subsequent TA-specific permit applications. The text and information available in the original Appendix F will now be incorporated into TA-specific closure plans in order to make them independent and complete within the applicable permit chapters. The closure plans will also be modified to incorporate information regarding post-closure applicability and filing requirements [see the response to Comment #1 in the "Response to Request for Supplemental Information for the October 1998 General Part B Permit Application, Revision 1.0, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515," submitted to the NMED in June 2000, and the response to Comment #3 in the "Response to Request for Supplemental Information for the October 1998 General Part B Permit Application, Revision 1.0, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515," (LA-UR-00-4951), submitted to the NMED in October 2000.]

*3. Documentation of filing of post-closure notices, as required under 40 CFR §264.119 (incorporated at 20.4.1.500 NMAC), for closed units, or a statement with explanation that there are no units currently subject to post-closure care requirements. [40 CFR §270.14(b)(14)]*

The list of current regulated units at LANL potentially subject to post-closure care requirements is presented in Table C-1 of Attachment C (see the response to Part B Comment #2). A review of closure records for LANL hazardous waste management units operated and closed since 1980 demonstrate that, for units that have completed closure, no post-closure notices have been necessary because the units have all been clean closed.

If post-closure notices are necessary for any disposal units for which complete clean closure cannot be achieved in the future, they will be provided after certification of closure, as required by 40 CFR §264.119. The filing of post-closure notices was described in response to NMED Comment #1 in the "Response to Request for Supplemental Information for the October 1998 General Part B Permit Application, Revision 1.0, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515," submitted to the NMED in June 2000. Post-closure filing procedures will be included in TA-specific closure plans. A brief discussion of the required notices is presented in Sections E.1.1.9 and E.2.1.9 of the "Los Alamos National Laboratory Hazardous Waste Facility Permit, Chapter 5, Technical Area 16 Conditions," submitted to the NMED in June 2000.

*4. On a topo map meeting the requirements of 40 CFR §270.14(b)(19) (incorporated at 20.4.1.900 NMAC), indicate the following:*

1) *surrounding land uses [40 CFR §270.14(b)(19)(iv)];*

Surrounding land uses are shown on Figure A-1 in Appendix A of the General Part B. In response to this RAI, Map 1 of the Part A permit application has been revised and is included as Attachment A of this submittal. As discussed during the December 11, 2000, PWG meeting, the revised map indicates the land use as "residential, commercial, agricultural, or recreational," as suggested by the regulation cited in the comment.

2) *points of compliance, monitoring wells, and contaminant plumes [40 CFR §270.14(c)(3)].*

Information on points of compliance and groundwater monitoring well locations is not currently available for inclusion on the topographic maps submitted with the General Part B permit application. The LANL hydrogeologic characterization program (as implemented through the LANL Hydrogeologic Workplan) and additional general information requirements of 40 CFR §270.14(c) are discussed in greater detail in the response to Part B Comment #7 below. The location of proposed points of compliance and potential groundwater monitoring wells will be determined by the characterization information derived from that program. Currently, there are no known groundwater contaminant plumes resulting from any regulated units at LANL. If any such plumes are discovered as the characterization program continues to be implemented, this information will be presented, as obtained, through the Hydrogeologic Workplan or subsequent monitoring programs.

5. *Information to demonstrate compliance with other applicable Federal laws under 40 CFR §270.3. Section 3.0 of the Application only states that LANL has programs in support of these laws. [40 CFR §270.14(b)(20)].*

The Department of Energy (DOE), with technical support from LANL's Ecology Group, consults with the appropriate state and Federal agencies regarding biological and cultural resource issues. LANL has programs in place to ensure compliance with the National Historic Preservation Act, the Endangered Species Act, and the Fish and Wildlife Coordination Act.

The National Historic Preservation Act is administered by the Advisory Council on Historic Preservation, appointed by the President, and the New Mexico State Historic Preservation Office. Section 106 of the Act requires DOE to consider the effects of its actions on historic properties, and provide the Council with a reasonable opportunity to comment on those actions and the manner in which DOE takes historic properties into account in their decisions. DOE accomplishes this through consultation with the State Historic Preservation Office whenever a project may potentially impact a historic property. LANL may prepare a Historic Building Survey Report assessing the eligibility of a historic building dating from the Manhattan Project and early Cold War periods (1943 to 1956) for the National Register of Historic Places and evaluating the impacts of the proposed actions. The consultation process has been formalized recently through a Programmatic Agreement between DOE, the Council, and the State. This agreement was signed in April 2000 and a copy is provided in Attachment E of this response.

For any undertaking on DOE land that may directly or indirectly impact threatened and endangered (T&E) species or their habitat, DOE must consult with the U.S. Fish and Wildlife Service (USFWS), as provided under Section 7 of the Endangered Species Act. Similarly, DOE must consult with the USFWS for projects that would impound, divert, or otherwise control or modify a body of water, as required by the Fish and Wildlife Coordination Act. For Endangered Species Act compliance, LANL may prepare a Biological Assessment to document the presence of T&E species and to evaluate the impacts of a project on a listed species or its habitat. DOE will then request in writing that the USFWS concurs with DOE's findings in the Biological Assessment. In recent years, DOE and LANL have streamlined the consultation process by preparing a T&E Species Habitat Management Plan. This plan fulfills the provisions of the Endangered Species Act that require federal agencies to carry out programs for the conservation of T&E species and their habitat. The USFWS approved this plan in a letter dated February 12, 1999. A copy of this letter is provided in Attachment F of this response.

6. *Notice of approval of exemption from or extension to Land Disposal Restrictions, in accordance with 40 CFR §268.5 or §268.6 (incorporated at 20.4.1.800 NMAC), if applicable, or a statement in the Application that no exemption or extension has been requested. [40 CFR §270.14(b)(21)]*

Currently, no exemption from or extension to Land Disposal Restrictions (LDR) has been requested by LANL. DOE had previously applied for a DOE multi-facility case-by-case extension (40 CFR §268.5) for storage of mixed Thirds waste. However, compliance at LANL with LDR storage requirements was subsequently attained through implementation of the LANL Site Treatment Plan. In the future, if LANL requires such an extension, it will be requested under 40 CFR §268.5, as necessary. Similarly, a petition to allow land disposal of a waste prohibited under 40 CFR, Part 264, Subpart C, would be requested under 40 CFR §268.6, if needed.

LANL proposes that the following language be added as Section 2.6 in the General Part B.

Currently, no exemption from or extension to Land Disposal Restrictions (LDR) has been requested by LANL. In the future, if LANL requires such an extension, it will be requested under 20.4.1 NMAC, Subpart VIII, §268.5 [6-14-00], as necessary. Similarly, a petition to allow land disposal of a waste prohibited under 20.4.1 NMAC, Subpart VIII, Part 264, Subpart C [6-14-00], would be requested under 20.4.1 NMAC, Subpart VIII, §268.6 [6-14-00], if needed.

7. *A list of regulated units under 40 CFR §264.90(a)(2) and §265.90, and groundwater monitoring data for regulated units meeting the requirements of 40 CFR §270.14(c), §§265.90 through 265.94, and §§264.91 through 264.100, including the following: a summary of interim status groundwater monitoring data; identification of uppermost and hydraulically connected aquifers; description of contaminant plumes with 40 CFR Subpart 264, Appendix IX, constituent concentrations; and detailed plans and engineering reports on required groundwater monitoring programs, including, as required, a detection monitoring program in compliance with 40 CFR §264.99 (incorporated at 20.4.1.500 NMAC), a compliance monitoring program in compliance with 40 CFR §264.99 (incorporated at 20.4.1.500 NMAC), and a corrective action*

*program in compliance with 40 CFR §264.100 (incorporated at 20.4.1.500 NMAC). [40 CFR §270.14(c)]*

Under 40 CFR §264.90(a)(2) and as presented in Table C-1 of Attachment C of this response, regulated units at LANL include the Area G Landfill (Shaft 124 and Pit 29), the Area H Landfill (Shaft 9), and the Area L Landfill (Surface Impoundments B, C, and D; Shafts 1, 13-17, and 19-34). As discussed during the December 11, 2000, PWG meeting, LANL is providing specific responses to all 40 CFR §270.14(c) requirements, as follows:

a) "A summary of the ground-water monitoring data obtained during the interim status period under §265.90 through 265.94, where applicable" [40 CFR 270.14(c)(1)].

Groundwater monitoring data for units subject to 40 CFR, Part 265, Subpart F, has not been provided because groundwater monitoring waiver demonstrations were in place until they were denied in 1995. Based on hydrogeologic conditions, evapotranspiration rates, and depth to groundwater, LANL provided demonstrations for groundwater monitoring waivers pursuant to 40 CFR §265.90(c).

These demonstrations and supporting data were submitted to the New Mexico Environmental Improvement Division (NMEID), and later, the NMED, beginning in 1984. The documents include the "Hydrogeologic Assessment of Technical Area 54, Areas G and L," LANL, March 1987; the "Installation Work Plan for Environmental Restoration Project," Rev. 3, November 1993; the "Groundwater Protection Management Program Plan", March 1995; the "Environment, Safety, and Health Self-Assessment Report," August 1991; and Appendix I of the "Hydrogeologic Review for the Environmental Restoration Program at LANL." After reviewing the data in these and other documents, NMED denied the groundwater monitoring waiver requests on May 30, 1995.

NMED requested the development of the Hydrogeologic Workplan in order to address perceived waiver demonstration inadequacies. In a letter dated August 17, 1995, NMED stated that "...a RCRA site-wide hydrogeologic workplan should be developed and submitted to NMED and EPA for review and approval. A site-wide hydrogeologic workplan developed under the driver of RCRA will provide a mechanism to assure a compliance schedule with specific tasks to meet the permit objectives. The workplan should address both the HSWA hydrogeologic permit requirements and RCRA regulatory ground-water monitoring requirements."

On March 25, 1998, NMED approved the Hydrogeologic Workplan in response to the stated requirement. As specifically set forth in the approved document, the objectives of the described activities are to provide sufficient information to, in part, "establish detection monitoring programs pursuant to 40 CFR 264.91-100 for regulated units or to demonstrate that groundwater monitoring requirements could be waived, or to provide appropriate groundwater monitoring as part of corrective actions pursuant to 40 CFR 264.101 for Solid Waste Management Units that have been determined to have had a release..." ("Hydrogeologic Workplan," Los Alamos National Laboratory, May 22, 1998, page ES-1).

As such, the workplan is intended to characterize the hydrogeology of the facility for both 40 CFR, Part 264, Subpart F, requirements and the corrective action program, and subsequently, to establish potential monitoring locations should they be deemed

necessary and appropriate. As part of the Hydrogeologic Workplan, the program wells are being located, designed, and constructed to comply with RCRA performance standards. These activities have included participation of NMED representatives on the Groundwater Integration Team (GIT) on a regular frequency, including Quarterly and Annual GIT meetings. The characterization activities are the first step to enable the Laboratory to obtain the hydrogeologic information necessary to form the basis for any monitoring program potentially implemented under Subpart F or to support a groundwater monitoring waiver demonstration under 20.4.1 NMAC, Subpart V, Part 264, Subpart F.

b) "Identification of the uppermost aquifer and aquifers hydraulically interconnected beneath the facility property, including ground-water flow direction and rate, and the basis for such identification (i.e., the information obtained from hydrogeologic investigations of the facility area)" [270.14(c)(2)].

Preliminary data for portions of the aquifer and any identified zones of saturation have been obtained through implementation of the Hydrogeologic Workplan and are reported in Groundwater Annual Status Reports. Under the workplan, well R-22 was drilled and completed near the regulated units at TA-54 and preliminary well development, aquifer characterization, and groundwater data have been obtained. These data will be presented, as available, both informally and through the agreed-upon scheduled reports. Information has also been provided to the NMED in previously submitted documents, including those listed in the above response to Comment #7, Section a.

c) "On the topographic map required under paragraph (b)(19) of this section, a delineation of the waste management area, the property boundary, the proposed "point of compliance" as defined under §264.95, the proposed location of ground-water monitoring wells as required under §264.97, and, to the extent possible, the information required in paragraph (c)(2) of this section" [270.14(c)(3)].

Topographic maps included with the "Los Alamos National Laboratory Technical Area 54 Part B Permit Renewal Application," Revision 0.0 and 0.1, submitted in January and September 1999, delineate the waste management areas at TA-54 and those portions of the LANL property boundary included within the area of each map. A complete property boundary is illustrated on Map 1 of the Part A; a revision of this map is included as Attachment A of this response. As discussed in the response above, the remaining information will be presented as it becomes available through implementation of the Hydrogeologic Workplan.

d) "A description of any plume of contamination that has entered the ground water from a regulated unit at the time that the application was submitted that:

- (i) Delineates the extent of the plume on the topographic map required under paragraph (b)(19) of this section;
- (ii) Identifies the concentrations of each Appendix IX constituent, of Part 264 of this chapter, throughout the plume or identifies the maximum concentrations of each Appendix IX constituent in the plume" [270.14(c)(4)].

There is currently no known groundwater contamination from regulated units at LANL. Preliminary results for the R-22 well near TA-54 will be presented both informally and in the agreed-upon scheduled reports. Although there are known volatile organic compound vapor plumes at TA-54 Areas L and G, available data do not indicate or

suggest that these contaminants have migrated to groundwater. Additional information on these vapor plumes is presented in the "RFI Report for Material Disposal Areas G, H, and L at Technical Area 54" (LA-UR-00-1140, March 2000), and can be discussed with the PWG as part of the TA-54-specific permit application review process.

e) "Detailed plans and an engineering report describing the proposed ground water monitoring program to be implemented to meet the requirements of §264.97" [270.14(c)(5)].

The need for and elements of a detailed groundwater monitoring program for the regulated units at LANL cannot be assessed until hydrogeologic characterization data obtained through implementation of the approved Hydrogeologic Workplan are available.

f) "If the presence of hazardous constituents has *not* been detected in the ground water at the time of permit application, the owner or operator must submit sufficient information, supporting data, and analyses to establish a detection monitoring program which meets the requirements of §264.98. This submission must address the following items specified under §264.98:

- (i) A proposed list of indicator parameters, waste constituents, or reaction products that can provide a reliable indication of the presence of hazardous constituents in the ground water;
- (ii) A proposed ground-water monitoring system;
- (iii) Background values for each proposed monitoring parameter or constituent, or procedures to calculate such values; and
- (iv) A description of proposed sampling, analysis and statistical comparison procedures to be utilized in evaluating ground-water monitoring data" [270.14(c)(6)].

The need for and elements of a detection monitoring program cannot be assessed without hydrogeologic characterization data obtained during implementation of the approved Hydrogeologic Workplan. As previously mentioned, this plan was developed to address perceived inadequacies with LANL's ground-water monitoring waiver demonstrations that, upon completion, may provide information sufficient to support a more complete TA-54 waiver demonstration. Additionally, after the original TA-54 demonstration was reviewed by the NMEID in the mid-1980's, a compliance order was issued to LANL requiring confirmatory subsurface investigation activities. Should all the technical information developed demonstrate that no potential exists for "migration of liquid from a regulated unit to the uppermost aquifer during the active life of the regulated unit" [40 CFR §264.90(b)], 40 CFR §270.14(c) would not apply. If the technical information demonstrates that such potential exists, sufficient information to establish a detection monitoring program will be submitted.

g) "If the presence of hazardous constituents has been detected in the ground water at the point of compliance at the time of the permit application, the owner or operator must submit sufficient information, supporting data, and analyses to establish a compliance monitoring program which meets the requirements of §264.99. Except as provided in §264.98(h)(5), the owner or operator must also submit an engineering feasibility plan for a corrective action program necessary to meet the requirements of §264.100, unless the owner or operator obtains written authorization in advance from the Regional Administrator to submit a proposed permit schedule for submittal of such a

plan. To demonstrate compliance with §264.99, the owner or operator must address the following items:

- (i) A description of the wastes previously handled at the facility;
- (ii) A characterization of the contaminated ground water, including concentrations of hazardous constituents;
- (iii) A list of hazardous constituents for which compliance monitoring will be undertaken in accordance with §§264.97 and 264.99;
- (iv) Proposed concentration limits for each hazardous constituent, based on the criteria set forth in §264.94(a), including a justification for establishing any alternate concentration limits;
- (v) Detailed plans and an engineering report describing the proposed ground-water monitoring system, in accordance with the requirements of §264.97; and
- (vi) A description of proposed sampling, analysis and statistical comparison procedures to be utilized in evaluating ground-water monitoring data" [270.14(c)(7)].

This requirement is not applicable because no hazardous constituents from regulated units at LANL have been detected in the groundwater. Also, a point of compliance for the regulated units at TA-54 cannot be determined without further hydrogeologic characterization information to be acquired through implementation of the approved Hydrogeologic Workplan.

h) "If hazardous constituents have been measured in the ground water which exceed the concentration limits established under §264.94 Table 1, or if ground water monitoring conducted at the time of permit application under §§265.90 through 265.94 at the waste boundary indicates the presence of hazardous constituents from the facility in ground water over background concentrations, the owner or operator must submit sufficient information, supporting data, and analyses to establish a corrective action program which meets the requirements of §264.100. However, an owner or operator is not required to submit information to establish a corrective action program if he demonstrates to the Regional Administrator that alternate concentration limits will protect human health and the environment after considering the criteria listed in §264.94(b). An owner or operator who is not required to establish a corrective action program for this reason must instead submit sufficient information to establish a compliance monitoring program which meets the requirements of §264.99 and paragraph (c)(6) of this section. To demonstrate compliance with §264.100, the owner or operator must address, at a minimum, the following items:

- (i) A characterization of the contaminated ground water, including concentrations of hazardous constituents;
- (ii) The concentration limit for each hazardous constituent found in the ground water as set forth in §264.94;
- (iii) Detailed plans and an engineering report describing the corrective action to be taken;
- (iv) A description of how the ground-water monitoring program will demonstrate the adequacy of the corrective action; and
- (v) The permit may contain a schedule for submittal of the information required in paragraphs (c)(8)(iii) and (iv) provided the owner or operator obtains written authorization from the Regional Administrator prior to submittal of the complete permit application" [270.14(c)(8)].

This requirement is not applicable because no hazardous constituents from a regulated unit have been measured in groundwater exceeding the above-prescribed limits.

8. *A list of and description of Solid Waste Management Units (SWMU's) at the Facility meeting the requirements of 40 CFR §270.14(d) (incorporated at 20.4.1.900 NMAC), including a description of the SWMU, dates of operation of the SWMU, specification of wastes managed at the SWMU, information on any releases from the SWMU, and sampling results for groundwater, soil, surface water, and air. [40 CFR §270(14)(d)]*

As discussed at the PWG meeting on December 11, 2000, the information specified in 40 CFR §270.14(d) has been provided for all solid waste management units (SWMU) at the Laboratory. These SWMUs, referred to in previous correspondence as the HSWA PRSs or SWMUs, fall generally into two categories: consolidated HSWA PRSs (included in the two consolidation requests approved by the NMED in 1999 and 2000) and non-consolidated HSWA PRSs. In the meeting, NMED agreed that the consolidation packages (for the consolidated units), combined with the previously submitted documents describing all the SWMUs at LANL (for both the consolidated and unconsolidated units), generally would suffice to meet the requirements specified above for the purposes of submitting an administratively complete permit application and preparing a draft permit.

- For the consolidated units, LANL provided a copy of the Laboratory's two consolidation packages to the NMED during the December 11, 2000, PWG meeting. The consolidation packages provide specific references to the source documents that provide detailed information for each PRS included in a given consolidated unit.
- For the non-consolidated units, Table D-1 of Attachment D provides specific references to the source documents previously submitted to the NMED by LANL in which each element of the 40 CFR §270.14(d) information can be found for each of the units. The document listed in Table D-1 of Attachment D for each PRS is the most recent document available. The right-hand column of Table D-1 indicates the date each document was submitted to the NMED.

As shown in Table G-1 of Attachment G, the information available to respond to each of the 40 CFR §270.14(d) requirements varies by SWMU according to the level of investigation completed to date. In many cases, the SWMU has been partially or fully investigated, and detailed, up-to-date information is available, either in a Voluntary Corrective Action Report, a Voluntary Corrective Measure Report, or a Resource Conservation and Recovery Act Facility Investigation (RFI) Report. For those SWMUs that have not yet been fully investigated, the limited information in the SWMU Report and the RFI (Operable Unit) Work Plan pertaining to that SWMU represents the only, and therefore the most up-to-date, information available.

At the above referenced PWG meeting, it was also determined that much of the 40 CFR §270.14(d) information for the non-consolidated units could be presented in one-page formats resembling those provided for the consolidated units. This format would provide the NMED with the necessary documentation to support public comment on the draft permit. The Laboratory recently began to assemble this information as part of a major initiative to update the ER Project's PRS Database. This project will require a resource-

**intensive effort over the next several months. LANL intends to have a version of the non-consolidated unit report available by the time the draft permit is issued for public comment, so that it can be included in the NMED file and made available for public review. A specific schedule for completion is now being prepared and will be provided for discussion as it becomes available.**

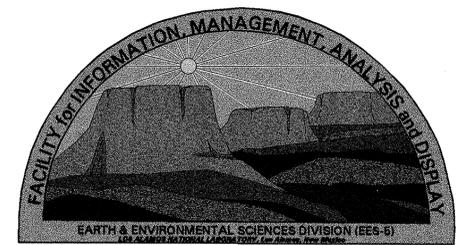
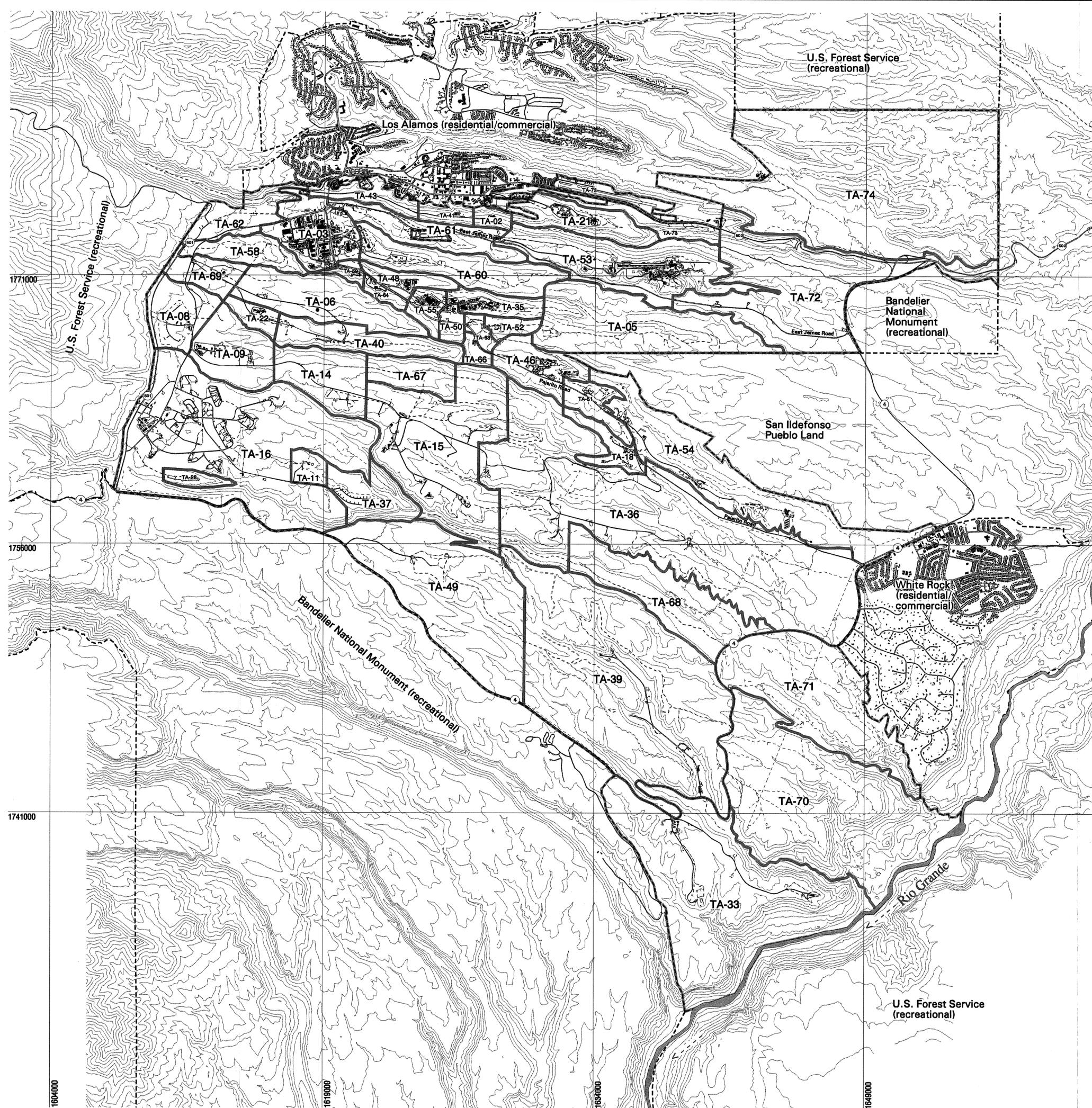
**ATTACHMENT A**  
**REVISED PART A MAP 1**

# Map 1: Contour Map Showing All Technical Areas (TA) at Los Alamos National Laboratory (LANL)

-  Boundary, LANL
-  Boundary, TA
-  Contours, 100 foot
-  Land Use Boundary
-  Roads, Dirt
-  Roads, Paved
-  Trail
-  Building

NOTE: TA-57, Fenton Hill Site, not shown

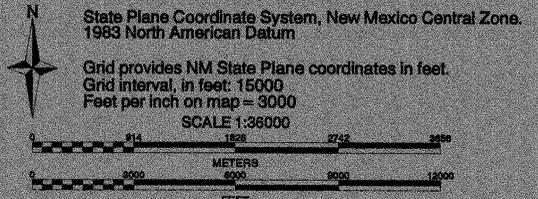
15904-A



Produced by: Marcia Jones  
 Date: December 19, 2000  
 FIMAD Plot ID: G109388

State Plane Coordinate System, New Mexico Central Zone, 1983 North American Datum

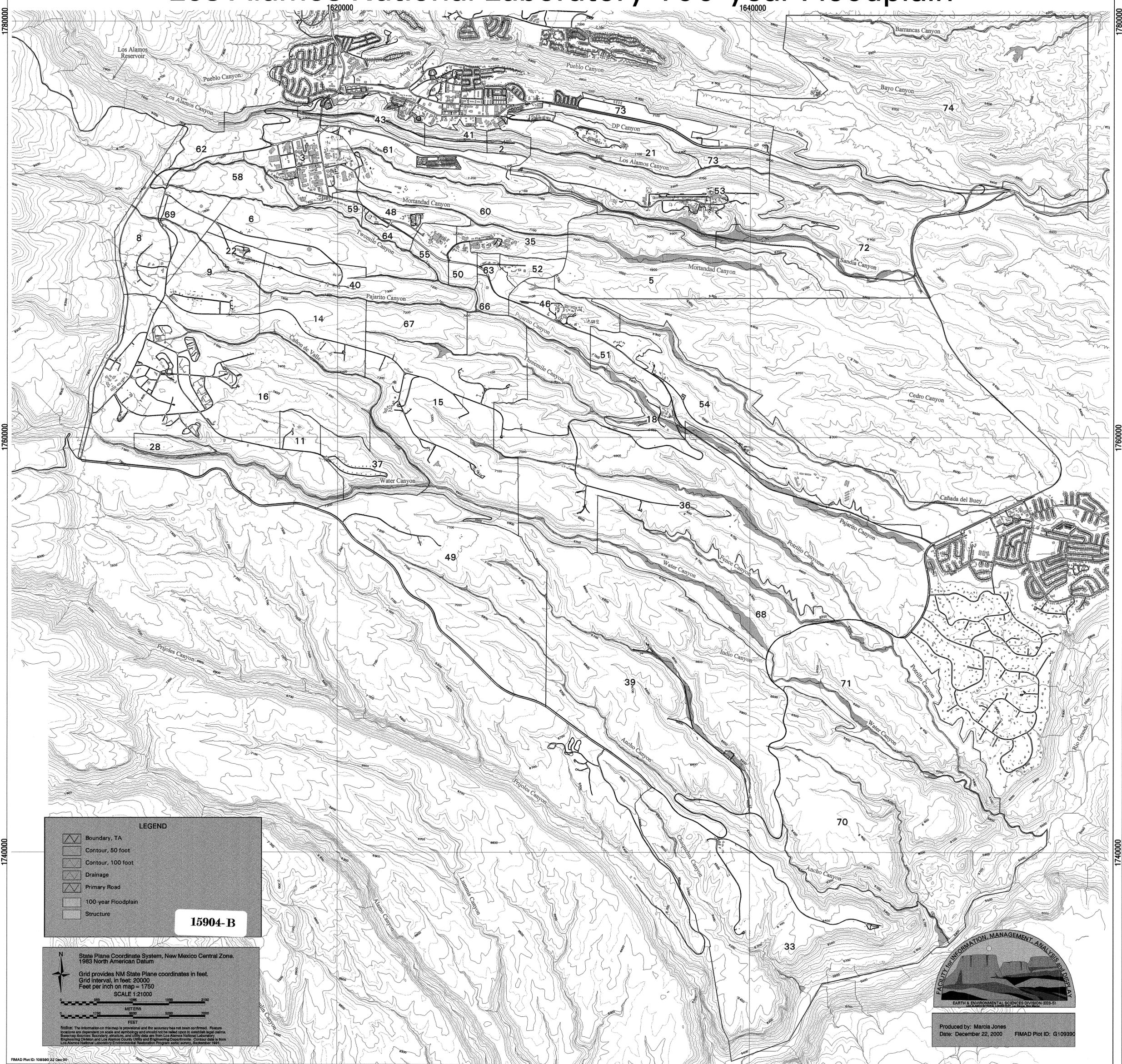
Grid provides NM State Plane coordinates in feet.  
 Grid interval, in feet: 15000  
 Feet per inch on map = 3000  
 SCALE 1:36000



NOTE: The information on this map is provisional and the accuracy has not been confirmed. Feature locations are dependent on scale and symbology and should not be relied upon to establish legal claims. Base map sources: Boundary, structure, and utility data are from Los Alamos National Laboratory Engineering Division and Los Alamos County Utility and Engineering Departments. Contour data is from Los Alamos National Laboratory Environmental Protection Program aerial survey, September 1991.

**ATTACHMENT B**  
**FLOODPLAIN MAP**

# Los Alamos National Laboratory 100-year Floodplain



**LEGEND**

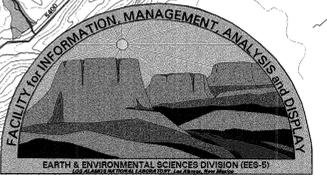
- Boundary, TA
- Contour, 50 foot
- Contour, 100 foot
- Drainage
- Primary Road
- 100-year Floodplain
- Structure

**15904-B**

State Plane Coordinate System, New Mexico Central Zone, 1983 North American Datum

Grid provides NM State Plane coordinates in feet.  
Grid interval, in feet: 20000  
Feet per inch on map = 1/1750  
SCALE 1:21000

Notice: The information on this map is provisional and the accuracy has not been confirmed. Feature locations are dependent on scale and symbology and should not be relied upon to establish legal claims. Boundary, structure, and utility data are from Los Alamos National Laboratory Engineering Division and Los Alamos County Utility and Engineering Departments. Contour data is from Los Alamos National Laboratory Environmental Restoration Program aerial survey, September, 1991.



Produced by: Marcia Jones  
Date: December 22, 2000  
FIMAD Plot ID: G109390

**ATTACHMENT C**

**TABLES OF REGULATED UNITS, SUBPART X UNITS,  
CLEAN-CLOSED OR CLOSING UNITS,  
AND OTHER MATERIAL DISPOSAL AREAS**

**TABLE C-1**

**REGULATED UNITS**

<b>UNIT</b>	<b>STRUCTURE</b>	<b>TYPE</b>	<b>OPERATING DATE</b>	<b>COMMENTS</b>
Material Disposal Area (MDA) G	Shaft 124	Landfill	1984-1987	"Closure and Post-Closure Plans for TA-54 Area G Landfill at Los Alamos National Laboratory" was submitted in September 1985.
	Pit 29	Landfill	1984-1986	
MDA H	Shaft 9	Landfill	7/80-8/86	"Closure and Post-Closure Plan for TA-54 Area H and Area L Landfill at Los Alamos National Laboratory" was submitted in November 1986. "Closure Plan for Technical Area 54, Material Disposal Area H" was submitted in March 1998.
MDA L	Impoundment B	Surface Impoundment	1978-6/85	"Closure and Post-Closure Plan for TA-54 Area H and Area L Landfill at Los Alamos National Laboratory" was submitted in November 1986. "Closure Plan for Technical Area 54, Material Disposal Area L" was submitted in March 1998.
	Impoundment C	Surface Impoundment	7/85-12/86	
	Impoundment D	Surface Impoundment	1972-1984	
	Shaft 1	Landfill Cell	4/80-8/83	
	Shaft 13	Landfill Cell	6/79-4/82	
	Shaft 14	Landfill Cell	6/79-4/82	
	Shaft 15	Landfill Cell	6/79-4/82	
	Shaft 16	Landfill Cell	6/79-4/82	
	Shaft 17	Landfill Cell	6/79-4/82	
	Shaft 19	Landfill Cell	4/80-4/82	
	Shaft 20	Landfill Cell	3/82-8/83	
	Shaft 21	Landfill Cell	3/82-12/84	
	Shaft 22	Landfill Cell	3/82-8/83	
	Shaft 23	Landfill Cell	4/82-2/84	
	Shaft 24	Landfill Cell	4/82-3/84	
	Shaft 25	Landfill Cell	9/82-4/85	
	Shaft 26	Landfill Cell	9/82-2/84	
	Shaft 27	Landfill Cell	1/83-1/85	
	Shaft 28	Landfill Cell	1/82-4/85	
	Shaft 29	Landfill Cell	12/83-7/84	
	Shaft 30	Landfill Cell	12/83-4/84	
	Shaft 31	Landfill Cell	12/83-8/84	
Shaft 32	Landfill Cell	3/84-8/84		
Shaft 33	Landfill Cell	3/84-1/85		
Shaft 34	Landfill Cell	2/85-4/85		

**TABLE C-2**  
**SUBPART X UNITS**

<b>UNIT</b>	<b>STRUCTURE</b>	<b>TYPE</b>	<b>OPERATING DATE</b>	<b>COMMENT</b>
Technical Area (TA)-14	23	Open Detonation/ Open Burn	1964-present	Closure plan originally submitted in "RCRA Part B Permit Application, Los Alamos National Laboratory," November 1988; last submitted in "Part B Permit Application, Open Burning/Open Detonation Units at Technical Areas 14, 15, 36, and 39," Rev. 1.0, October 1997.
TA-16	388	Open Burn	1951-present	Closure plan originally submitted in "RCRA Part B Permit Application, Los Alamos National Laboratory," November 1988; last submitted in "Los Alamos National Laboratory Technical Area 16 Part B Permit Renewal Document," Rev. 3.0, January 2000.
	399	Open Burn	1951-present	
	401	Open Burn	1961-present	
	406	Open Burn	1965-present	
	387	Open Burn	1951-1999	Clean closure in progress in accordance with the "Closure Plan for the TA-16-387 Flash Pad," August 1999, and in conjunction with MDA P closure.
	394	Open Burn	1951-1999	Clean closure in progress in accordance with the "Closure Plan for the TA-16-394 Burn Tray," November 1999.
TA-36	8	Open Detonation	1950-present	Closure plan originally submitted in "RCRA Part B Permit Application, Los Alamos National Laboratory," November 1988; last submitted in "Part B Permit Application, Technical Area 36 Open Detonation Unit," Rev. 0.0, September 1999.
TA-39	6	Open Detonation	1953-present	Closure plan originally submitted in "RCRA Part B Permit Application, Los Alamos National Laboratory," November 1988; last submitted in "Part B Permit Application, Technical Area 39 Open Detonation Unit," Rev. 0.0, February 2000.
	57	Open Detonation	1953-2000	Partial closure, letter: Oct. 26, 2000

**TABLE C-3**

**UNITS CLEAN CLOSED OR UNDERGOING CLEAN CLOSURE**

UNIT	TYPE	OPERATING DATES	CLOSURE DATE	COMMENTS
Material Disposal Area (MDA) P	Landfill	1950s-1984		Undergoing clean closure
Technical Area (TA)-16 Surface Impoundment	Surface Impoundment	1940s-1980s	1993	Clean closed
TA-35-85	Surface Impoundment	1985-1988	1998	Clean closed
TA-35-125	Surface Impoundment	1985-1988	1993	Clean closed
TA-50-1 Batch Waste Treatment Unit	Treatment Tanks	1989-1992	1995	Clean closed
TA-54, Area L, Treatment Tanks	Treatment/Storage Tanks	1985-1993	1994	Clean closed (2 of 4 tanks)
TA-54, Area L, Waste Oil Storage Tanks	Storage Tanks	1987-1989	1995	Tanks clean closed; soil residuals-- closure deferred

TA - 53 surface?  
impoundments

July 1997 - NMED notified  
DOE of approval from

TSD to corrective  
action units

is that Subpart S CAMU?  
No - LW

**TABLE C-4**

**MATERIAL DISPOSAL AREAS (MDA) NOT REGULATED UNDER 40 CFR, PARTS 264 OR 265, CLOSURE OR POST-CLOSURE CARE REQUIREMENTS**

<b>UNIT</b>	<b>TA</b>	<b>PRS NUMBER</b>	<b>OPERATING DATES</b>	<b>COMMENTS</b>
MDA A	21	20-014	1944-47, 1969-78	No regulated waste received after the effective date of regulation
MDA B	21	20-015	1945-1948	No regulated waste received after the effective date of regulation
MDA C	50	50-009	1948-1969	No regulated waste received after the effective date of regulation
MDA D	33	33-003(a and b)	1948-1953	No regulated waste received after the effective date of regulation
MDA E	33	33-001(a)	1949-1963	No regulated waste received after the effective date of regulation
MDA F	6	06-007	1940s-1950s	No regulated waste received after the effective date of regulation
MDA G	54	54-014 through 54-020	1959-present	No regulated waste received after the effective date of regulation, except for structures listed in Table C-1
MDA H	54	54-004	1960-1986	No regulated waste received after the effective date of regulation, except for Shaft 9 listed in Table C-1
MDA K	33	33-002(a)	1950s-present	Actively permitted septic tank in accordance with 20 NMAC 7.3
MDA L	54	54-006	1950s-1985	No regulated waste received after the effective date of regulation, except for structures listed in Table C-1
MDA M	9	09-013	1940s-1950s	No regulated waste received after the effective date of regulation
MDA N	15	15-007	1965-1980s	Managed solid waste only
MDA Q	8	08-006	Late 1940s	No regulated waste received after the effective date of regulation
MDA R	16	16-019	1940s	No regulated waste received after the effective date of regulation
MDA S	11	11-009	1965	One-time burial of high explosives for experimental purposes
MDA T	21	21-016(a and c)	1945-1980s	No regulated waste received after the effective date of regulation
MDA U	21	21-017	1945-1968	No regulated waste received after the effective date of regulation
MDA V	21	21-018(a)	1945-1968	No regulated waste received after the effective date of regulation
MDA W	35	35-001	1970s	No regulated waste received after the effective date of regulation
MDA X	35	35-002	1968-present	Manages radioactive waste only
MDA Y	39	39-001(b)	1953-1989	Managed solid waste only
MDA Z	15	15-007	1965-1980s	Managed solid waste only
MDA AA	36	36-001	?-1989	Managed solid waste only; closed in accordance with the New Mexico Solid Waste Regulations, 1989
MDA AB	49	49-004	1959-1961	No regulated waste received after the effective date of regulation

**ATTACHMENT D**  
**NON-CONSOLIDATED POTENTIAL RELEASE SITES**

T/ D-1  
**NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
 AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)**

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
00-001	Mortandad Canyon Sediment Traps		Yes	Yes	SAP	Sampling and Analysis Plans for 1) HSWA Perched Zone Monitoring Wells and 2) the Mortandad Sediment Traps	4/14/95
00-011(a)	Mortar impact area		Yes	Yes	RFI Report	RFI Phase Report for OU 1071, SWMU Aggregate O-D (ordnance impact areas) PRSs 0-011(a, c, d, e) and C-0-020	3/30/94
00-011(c)	Mortar impact area		No		RFI Report	RFI Phase Report for OU 1071, SWMU Aggregate O-D (ordnance impact areas) PRSs 0-011(a, c, d, e) and C-0-020	3/30/94
00-011(d)	Mortar impact area		Yes		RFI Report	RFI Phase Report for OU 1071, SWMU Aggregate O-D (ordnance impact areas) PRSs 0-011(a, c, d, e) and C-0-020	3/30/94
00-011(e)	Mortar impact area		Yes	Yes	RFI Report	RFI Phase Report for OU 1071, SWMU Aggregate O-D (ordnance impact areas) PRSs 0-011(a, c, d, e) and C-0-020	3/30/94
00-016	Firing range (inactive)	June 2000 Permit Mod. Request	Yes	Yes	VCA Report	Revised VCA Completion Report for PRS 0-016, Revision 1 HSWA	11/19/98
00-017	Waste lines		Yes		RFI Report	RFI Report for Potential Release Site 0-017 (former Line 167, Line 170, Line 171)	7/30/99
00-018(a)	Sludge bed Wastewater treatment plant Pueblo (decommissioned)		Yes		RFI Report	RFI RPT TA 00: PRS 0-018(a,b), Waste Water Treatment Plant	9/12/97
00-019	Wastewater treatment plant, Central		Yes		VCA Plan	Voluntary Corrective Action Plan Addendum for Potential Release Site 0-019	1/20/00
00-030(a)	Septic system, DP Road		Yes		VCA Plan	Voluntary Corrective Action Plan TA 0: PRS 0-030(a)	4/24/96
00-030(g)	Septic system (near old Catholic Church parking lot)		Yes		Status Report	Revised Status Report SWMU 0-030(g) Former Location of Septic Tank and Vitrified Clay Pipe	12/23/98
00-033(a)	Warehouses, 6th Street (UST removal)	June 2000 Permit Mod. Request	Yes	Yes	VCA Report	Voluntary Corrective Action Report TA 0: PRSs 0-030(l,m), 0-033(a)	10/11/96
00-039	Underground tanks - new SWMU		Yes		RFI Report	RFI RPT TA 0: PRS 0-039	2/28/96
01-001(m)	Septic tank 275		No		RFI Report	RFI RPT TA 1: AGG. A, B, H, I, J PRSs 1-001(a,e,m,o), 1-003(a,d,e), 1-006(e,o), 1-007(d,j,e)	3/5/96
01-003(d)	Surface disposal site (Can dump)		Yes	Yes	VCA Report	VCA Report TA 1: PRS 1-003(d) 8/21/96 rept date	9/13/96
02-005	Systematic leak Cooling tower blowdown, Cr		Yes		RFI Work Plan	RFI Work Plan for Operable Unit (OU) 1098	6/4/93
02-006(a)	Ind. or san. waste water treat.		Yes		RFI Work Plan	RFI Work Plan for Operable Unit (OU) 1098	6/4/93
02-006(b)	Ind. or san. waste water treat.		Yes		RFI Work Plan	RFI Work Plan for Operable Unit (OU) 1098	6/4/93
02-008(a)	Outfall		Yes		RFI Work Plan	RFI Work Plan for Operable Unit (OU) 1098	6/4/93
02-008(b)	Outfall from photo processing facility, TA-2-4	June 2000 Permit Mod. Request	No		RFI Report	RFI RPT TAs 2: PRSs 2-004(a-f), 2-008(b), 2-012. Approved 9/23/97	9/27/96
03-001(k)	Storage pad		No		RFI Work Plan	RFI Work Plan Submittal OU 1114	7/7/93
03-002(a)	Less-than-90-day accumulation area	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	4/18/95

**TABLE D-1  
NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)**

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
03-002(c)	Storage area		Yes		RFI Report	RFI RPT for 53 PRSs in TAs 3,59,60,61	2/29/96
03-002(d)	Container storage area	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-003(a)	Storage area		Yes		RFI Report	RFI RPT for 53 PRSs in TAs 3,59,60,61	2/29/96
03-003(b)	Storage area		Yes		RFI Report	RFI RPT for 53 PRSs in TAs 3,59,60,61	2/29/96
03-003(c)	Equipment storage area - PCB only site		No		RFI Work Plan	RFI Work Plan Submittal OU 1114	7/7/93
03-009(c)	Surface disposal	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan Submittal OU 1114	7/7/93
03-009(d)	Surface disposal site		No		RFI Work Plan	RFI Work Plan Submittal OU 1114	7/7/93
03-009(g)	Surface disposal	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan Submittal OU 1114	7/7/93
03-009(i)	Surface disposal site		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-009(j)	Surface disposal site		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-010(a)	Vacuum repair shop (former location) Systematic release site		Yes		RFI Report	Addendum to RFI Report for Field Unit 1, SWMU 3-010(a)	10/17/00
03-011	Systematic product release		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-014(r)	Waste water treatment facility		No		RFI Report	RFI RPT for 53 PRSs in TAs 3,59,60,61	2/29/96
03-014(s)	Waste water treatment facility		No		RFI Report	RFI RPT for 53 PRSs in TAs 3,59,60,61	2/29/96
03-014(t)	Waste water treatment facility		No		RFI Report	RFI RPT for 53 PRSs in TAs 3,59,60,61	2/29/96
03-019	Septic tank	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-021	Surface disposal site		Yes		RFI Report	RFI RPT TA 03: PRS 3-004(c,d), 3-007, 3-049(a), 3-052(b), 3-056(k), C-03-014, 3-014(k,l,o), 3-021	9/30/97
03-025(a)	Tank and/or assoc. equipment	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-025(b)	Tank and/or assoc. equipment		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-026(b)	Sumps	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-026(c)	Tank and/or assoc. equipment		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-026(d)	Tank and/or assoc. equipment		No		RFI Work Plan	RFI Work Plan Submittal OU 1114	7/7/93
03-031	Tank and/or assoc. equipment		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-032	Tank and/or assoc. equipment	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-033	Sump		Yes		RFI Report	RFI RPT for 53 PRSs in TAs 3,59,60,61	2/29/96
03-034(a)	Tank and/or assoc. equipment Radioactive liquid waste tanks		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-034(b)	Tank and/or assoc. equipment		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-037	Underground tank		No		RFI Work Plan	RFI Work Plan Submittal OU 1114	7/7/93

T/ D-1  
 NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
 AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
03-043(c)	Tank and/or assoc. equipment		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-043(e)	Underground tank	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan Submittal OU 1114	7/7/93
03-044(a)	Container storage	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-045(a)	Outfall (Ind. or san. waste water treatment)		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-045(e)	Outfall (Ind. or san. waste water treatment)		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-045(f)	Outfall from Drain(Ind. or san. waste water treatment)		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-045(i)	Outfall (Ind. or san. waste water treatment)	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-046	Above Ground Storage Tank(Physical, chem. &/or bio. treat.)		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-049(c)	Outfall	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-049(d)	Outfall	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-049(e)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-050(e)	Exhaust Emissions Off-gas scrubber of HEPA filter sys.	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-052(c)	Storm drainage	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-054(c)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-054(e)	Outfall		Yes		RFI Report	RFI RPT TA 03: PRS 3-054(e), C-3-006,CMR	9/30/97
03-055(a)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-055(c)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-055(d)	Outfall	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-056(a)	Storage area		No		RFI Work Plan	RFI Work Plan Submittal OU 1114	7/7/93
03-056(c)	Transformer storage area - PCB only site		Yes		VCA Plan	Voluntary Corrective Action Plan for Potential Release Site 3-056(c)	10/20/99
03-056(l)	Drum Storage		No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-056(m)	Drum Storage	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95
03-056(n)	Drum Storage	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1114, ADD. 1	7/18/95

TABLE D-1  
NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
05-003	Former Calibration chamber		No		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
05-004	Former Septic system		Yes		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
06-001(a)	Septic system		Yes		RFI Report	RFI RPT TA 06,7,8,22,40: 6-001(a,b), 6-003(a,c,f,g), 6-007(g), 6-008, 7-001(a,b,c,d), 8-002, 22-010(a,b), 22-014(a,b), 22-016, 40-005, C-6-019	9/29/97
06-001(b)	Septic system		Yes		RFI Report	RFI RPT TA 06,7,8,22,40: 6-001(a,b), 6-003(a,c,f,g), 6-007(g), 6-008, 7-001(a,b,c,d), 8-002, 22-010(a,b), 22-014(a,b), 22-016, 40-005, C-6-019	9/29/97
06-003(d)	Firing site (inactive)		No		RFI Work Plan	RFI Work Plan for OU 1111	6/30/93
06-003(e)	Firing site (inactive)		No		RFI Work Plan	RFI Work Plan for OU 1111	6/30/93
06-003(f)	Firing site (inactive)		Yes		RFI Report	RFI RPT TA 06,7,8,22,40: 6-001(a,b), 6-003(a,c,f,g), 6-007(g), 6-008, 7-001(a,b,c,d), 8-002, 22-010(a,b), 22-014(a,b), 22-016, 40-005, C-6-019	9/29/97
06-003(h)	Firing site (inactive)		No		RFI Work Plan	RFI Work Plan for OU 1111	6/30/93
06-006	Storage area		Yes		RFI Work Plan	RFI Work Plan for OU 1111	6/30/93
06-007(f)	Surface disposal		Yes	Yes	VCA Report	Voluntary Corrective Action Report for TA 6; PRS 6-007(f)	4/19/96
06-007(g)	Building & surface disposal		Yes		RFI Report	RFI RPT TA 06,7,8,22,40: 6-001(a,b), 6-003(a,c,f,g), 6-007(g), 6-008, 7-001(a,b,c,d), 8-002, 22-010(a,b), 22-014(a,b), 22-016, 40-005, C-6-019	9/29/97
08-002	Firing site (inactive)		Yes		RFI Report	RFI RPT TA 06,7,8,22,40: 6-001(a,b), 6-003(a,c,f,g), 6-007(g), 6-008, 7-001(a,b,c,d), 8-002, 22-010(a,b), 22-014(a,b), 22-016, 40-005, C-6-019	9/29/97
08-004(c)	Floor Drain and Sumps		No		RFI Work Plan	RFI Work Plan for OU 1157	7/23/93
08-004(d)	Drain		Yes		RFI Report	RFI RPT TAs 8, 9: PRSs 8-004(d), 8-009(d,e), C-8-010, 9-001(a,b,d), 9-003(g-i), 9-005(a,d), 9-008(b), 9-009	3/15/96
08-005	Container storage area		Yes	Yes	VCA Report	Voluntary Corrective Action Completion Report HSWA: 8-005	4/19/96
08-006(a)	Material disposal area (MDA Q) Landfill		No		RFI Work Plan	RFI Work Plan for OU 1157	7/23/93
08-009(d)	Ind. or san. wastewater treat.		Yes		RFI Report	RFI RPT TAs 8, 9: PRSs 8-004(d), 8-009(d,e), C-8-010, 9-001(a,b,d), 9-003(g-i), 9-005(a,d), 9-008(b), 9-009	3/15/96
08-009(e)	Ind. or san. wastewater treat.		Yes		RFI Report	RFI RPT TAs 8, 9: PRSs 8-004(d), 8-009(d,e), C-8-010, 9-001(a,b,d), 9-003(g-i), 9-005(a,d), 9-008(b), 9-009	3/15/96
09-001(c)	Firing sites (inactive)		Yes		RFI Work Plan	RFI Work Plan for OU 1157	7/23/93
09-001(d)	Firing sites (inactive)		Yes		RFI Report	RFI RPT TAs 8, 9: PRSs 8-004(d), 8-009(d,e), C-8-010, 9-001(a,b,d), 9-003(g-i), 9-005(a,d), 9-008(b), 9-009	3/15/96
09-002	Burn pit		Yes		RFI Report	RFI Report for PRSs 9-002 [HSWA] and 9-011(b) [Non-HSWA]	9/30/98
09-003(d)	Settling tank		Yes		RFI Work Plan	RFI Work Plan for OU 1157	7/23/93
09-003(g)	Settling tank		Yes		RFI Report	RFI RPT TAs 8, 9: PRSs 8-004(d), 8-009(d,e), C-8-010, 9-001(a,b,d), 9-003(g-i), 9-005(a,d), 9-008(b), 9-009	3/15/96

T/ D-1  
 NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
 AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
09-003(h)	Settling tank		Yes		RFI Report	RFI RPT TAs 8, 9: PRSs 8-004(d), 8-009(d,e), C-8-010, 9-001(a,b,d), 9-003(g-i), 9-005(a,d), 9-008(b), 9-009	3/15/96
09-003(i)	Settling tank		Yes		RFI Report	RFI RPT TAs 8, 9: PRSs 8-004(d), 8-009(d,e), C-8-010, 9-001(a,b,d), 9-003(g-i), 9-005(a,d), 9-008(b), 9-009	3/15/96
09-004(g)	Settling tank		No		RFI Work Plan	RFI Work Plan for OU 1157	7/23/93
09-004(o)	Settling tank		Yes		RFI Work Plan	RFI Work Plan for OU 1157	7/23/93
09-005(g)	Septic system		No		RFI Work Plan	RFI Work Plan for OU 1157	7/23/93
09-006	Septic system		Yes		RFI Work Plan	RFI Work Plan for OU 1157	7/23/93
09-009	Surface impoundment		Yes		RFI Report	RFI RPT TAs 8, 9: PRSs 8-004(d), 8-009(d,e), C-8-010, 9-001(a,b,d), 9-003(g-i), 9-005(a,d), 9-008(b), 9-009	3/15/96
09-013	Material disposal area (MDA M)		Yes		EC Plan	Expedited Cleanup Plan TA 9: PRS 9-013	6/1/95
10-004(a)	Septic system		Yes		Interim Action	Interim Action Report TA 10: PRSs 10-002(a,b), 10-003(a-o), 10-004(a,b), 10-007 HSWA	6/9/97
10-006	Burn site - doesn't exist		No		RFI Work Plan	RFI Work Plan for OU1079	5/1/92
11-001(b)	Firing site (inactive)		No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
11-001(c)	Firing site (inactive)		Yes		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
11-005(a)	Septic system		No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
11-005(b)	Septic system		No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
11-005(c)	Ind. or san. wastewater treat.		No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
11-009	Material disposal area (MDA S)		No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
11-011(c)	Steam Vent Line	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1082 Add 1	7/6/94
11-011(d)	Ind. or san. wastewater treat.		No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
13-004	Disposal pit - doesn't exist		No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
14-003	Open burning ground		Yes	Yes	RFI Report	RFI RPT TAs 12, 14, 67 : (40 PRSs)(OU 1085) RFI RPT TAs 12, 14: PRSs 12-001(a,b), 12-004(a,b), C-12-001, C-12-002, C-12-003, C-12-004, C-12-005, 14-001(a-g), 14-002(a-f), 14-003, 14-005, 14-006, 14-007, 14-009, 14-010, C-14-001, C-14-002, C-14-003, C-	2/15/96
14-005	Burn Cage (active)		No		RFI Report	RFI RPT TAs 12, 14, 67 : (40 PRSs)(OU 1085) RFI RPT TAs 12, 14: PRSs 12-001(a,b), 12-004(a,b), C-12-001, C-12-002, C-12-003, C-12-004, C-12-005, 14-001(a-g), 14-002(a-f), 14-003, 14-005, 14-006, 14-007, 14-009, 14-010, C-14-001, C-14-002, C-14-003, C-	2/15/96

**TABLE D-1  
NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)**

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
14-006	Tank and/or assoc. equip.		Yes		RFI Report	RFI RPT TAs 12, 14, 67 : (40 PRSs)(OU 1085) RFI RPT TAs 12, 14: PRSs 12 -001(a,b), 12-004(a,b), C-12-001, C-12-002, C-12-003, C-12-004, C-12-005, 14-001(a-g), 14-002(a-f), 14-003, 14-005, 14-006, 14-007, 14-009, 14-010, C-14-001, C-14-002, C-14-003, C-	2/15/96
14-007	Septic system		Yes		RFI Report	RFI RPT TAs 12, 14, 67 : (40 PRSs)(OU 1085) RFI RPT TAs 12, 14: PRSs 12 -001(a,b), 12-004(a,b), C-12-001, C-12-002, C-12-003, C-12-004, C-12-005, 14-001(a-g), 14-002(a-f), 14-003, 14-005, 14-006, 14-007, 14-009, 14-010, C-14-001, C-14-002, C-14-003, C-	2/15/96
15-004(a)	Firing site C (inactive)		Yes		RFI Report	RFI RPT TA 15: PRSs 15-004(a-d,f), 15-007(b), 15-008(a-b), 15-009(e,j), 15-012(b), C-15-004.	11/1/95
15-004(i)	Detonation ground - doesn't exist		No		RFI Work Plan	RFI Work Plan submittal for OU 1086 w/modifications	7/1/93
15-006(b)	Firing site Ector - active		No		RFI Work Plan	RFI Work Plan submittal for OU 1086 w/modifications	7/1/93
15-007(b)	Material disposal area (MDA Z) Landfill		Yes		RFI Report	RFI RPT TA 15: PRSs 15-004(a-d,f), 15-007(b), 15-008(a-b), 15-009(e,j), 15-012(b), C-15-004.	11/1/95
15-008(d)	Surface disposal		No		RFI Work Plan	RFI Work Plan submittal for OU 1086 w/modifications	7/1/93
15-009(b)	Septic system		No		RFI Work Plan	RFI Work Plan submittal for OU 1086 w/modifications	7/1/93
15-009(c)	Septic tank		Yes		RFI Work Plan	RFI Work Plan submittal for OU 1086 w/modifications	7/1/93
15-009(e)	Septic system E/F site		Yes		RFI Report	RFI RPT TA 15: PRSs 15-004(a-d,f), 15-007(b), 15-008(a-b), 15-009(e,j), 15-012(b), C-15-004.	11/1/95
15-009(g)	Septic tank (still active)		No		RFI Work Plan	RFI Work Plan submittal for OU 1086 w/modifications	7/1/93
15-009(h)	Septic tank		No		RFI Work Plan	RFI Work Plan submittal for OU 1086 w/modifications	7/1/93
15-009(i)	Septic tank		Yes		RFI Report	RFI RPT TA 15: PRSs 15-001, 15-002, 15-004(g, h), 15-005(b,c), 15-006(c,d), 15-007(a), 15-008(c,g), 15-009(a, f, i, k), 15-010(a-c), 15-011(a-c), 15-012(a), 15-014(a,b,d,e,g-l), C-15-001, C-15-005, C-15-006, C-15-007, C-15-010, C-15-011; SAPs: 15-010(a);	5/20/96
15-009(j)	Septic tank	June 2000 Permit Mod. Request	Yes	Yes	VCA Report	VCA Completion Report for TA-15, PRS 15-009(j) HSWA	9/30/98
15-010(a)	Septic system		Yes		RFI Report	RFI RPT TA 15: PRSs 15-001, 15-002, 15-004(g, h), 15-005(b,c), 15-006(c,d), 15-007(a), 15-008(c,g), 15-009(a, f, i, k), 15-010(a-c), 15-011(a-c), 15-012(a), 15-014(a,b,d,e,g-l), C-15-001, C-15-005, C-15-006, C-15-007, C-15-010, C-15-011; SAPs: 15-010(a);	5/20/96
15-010(b)	Septic system		Yes		RFI Report	RFI RPT TA 15: PRSs 15-001, 15-002, 15-004(g, h), 15-005(b,c), 15-006(c,d), 15-007(a), 15-008(c,g), 15-009(a, f, i, k), 15-010(a-c), 15-011(a-c), 15-012(a), 15-014(a,b,d,e,g-l), C-15-001, C-15-005, C-15-006, C-15-007, C-15-010, C-15-011; SAPs: 15-010(a);	5/20/96

TA 5-1  
**NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
 AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)**

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
15-010(c)	Drain line		No		RFI Report	RFI RPT TA 15: PRSs 15-001, 15-002, 15-004(g, h), 15-005(b,c), 15-006(c,d), 15-007(a), 15-008(c,g), 15-009(a, f, i, k), 15-010(a-c), 15-011(a-c), 15-012(a), 15-014(a,b,d,e,g-l), C-15-001, C-15-005, C-15-006, C-15-007, C-15-010, C-15-011; SAPs: 15-010(a);	5/20/96
15-012(a)	Surface disposal (not located) - doesn't exist	June 2000 Permit Mod. Request	No		RFI Report	RFI RPT TA 15: PRSs 15-001, 15-002, 15-004(g, h), 15-005(b,c), 15-006(c,d), 15-007(a), 15-008(c,g), 15-009(a, f, i, k), 15-010(a-c), 15-011(a-c), 15-012(a), 15-014(a,b,d,e,g-l), C-15-001, C-15-005, C-15-006, C-15-007, C-15-010, C-15-011; SAPs: 15-010(a);	5/20/96
15-012(b)	Surface disposal site	June 2000 Permit Mod. Request	Yes		VCA Report	VCA Completion Report for PRS 15-012(b) HSWA	9/30/98
15-014(l)	Outfall (still active)		No		RFI Report	RFI RPT TA 15: PRSs 15-001, 15-002, 15-004(g, h), 15-005(b,c), 15-006(c,d), 15-007(a), 15-008(c,g), 15-009(a, f, i, k), 15-010(a-c), 15-011(a-c), 15-012(a), 15-014(a,b,d,e,g-l), C-15-001, C-15-005, C-15-006, C-15-007, C-15-010, C-15-011; SAPs: 15-010(a);	5/20/96
16-001(d)	Dry well		No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-003(a)	Sump		Yes		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-003(b)	Sump		Yes		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-003(i)	Sump TA-16-265		Yes		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-003(j)	Sump TA-16-267		Yes		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-003(o)	Sump		Yes		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-005(a)	Septic tank		No		RFI Work Plan	RFI Work Plan for OU 1082 Add 1	7/6/94
16-005(b)	Decommissioned septic system	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1082 Add 1	7/6/94
16-005(h)	Septic tank		No		RFI Work Plan	RFI Work Plan for OU 1082 Add 1	7/6/94
16-005(k)	Septic tank		No		RFI Work Plan	RFI Work Plan for OU 1082 Add 1	7/6/94
16-005(l)	Grease trap		No		RFI Work Plan	RFI Work Plan for OU 1082 Add 1	7/6/94
16-005(n)	Septic system		No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-006(a)	Septic system		No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-009(a)	Burn site		No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-010(b)	Burn site currently undergoing RCRA closure TA-16-387 - RCRA Unit	Aug. 2000, Class 1 Permit Mod. Request	No		Closure Plan	Closure Plan for the TA-16-387 Flash Pad	8/13/99
16-010(c)	Active Burn site TA-16-388 - RCRA Unit	Aug. 2000, Class 1 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-010(d)	Active Burn site TA-16-389 - RCRA Unit	Aug. 2000, Class 1 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-010(e)	Active HE Filter vessel TA-16-401 - RCRA Unit	Aug. 2000, Class 1 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93

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NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)**

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
16-010(f)	Burn site - RCRA Unit	Aug. 2000, Class 1 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-015(a)	Operational facility TA-16-16		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-015(b)	Operational facility TA-16-18		No		RFI Work Plan	RFI Work Plan for OU 1082 Add 1	7/6/94
16-016(a)	Landfill - Buried metal site		No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-016(b)	Landfill		Yes	Yes	VCA Report	Final Voluntary Corrective Action Report HSWA: 16-016(b)	4/19/96
16-016(d)	Surface disposal site		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-016(e)	Surface disposal site		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-016(g)	Surface disposal site		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-018	Material disposal area MDA P currently undergoing RCRA closure		Yes		Closure Plan	DOE/LANL Closure Plan for TA 16, MDA P	2/1/95
16-019	Material disposal area (MDA R)		Yes		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-020	Silver recovery unit		Yes		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-025(a)	Abandoned building & appurtenances TA-16-39		No		RFI Work Plan	RFI Work Plan for OU 1082 Add 1	7/6/94
16-025(b)	Abandoned building & appurtenances TA-16-40		Yes		RFI Work Plan	RFI Work Plan for OU 1082 Add 1	7/6/94
16-025(c2)	Abandoned building & appurtenances TA-16-56		No		RFI Work Plan	RFI Work Plan for OU 1082 Add 1	7/6/94
16-025(d2)	Abandoned building & appurtenances TA-16-480		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-025(e2)	Abandoned building & appurtenances		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-025(f2)	Abandoned building & appurtenances		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-025(h2)	Abandoned building & appurtenances		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-025(w)	Abandoned building & appurtenances TA-16-81		No		RFI Work Plan	RFI Work Plan for OU 1082 Add 1	7/6/94
16-026(a2)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(c2)	Outfall TA-16-462		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(d2)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(e2)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(f)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(f2)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(g)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(g2)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(h)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(i)	Outfall TA-16-224		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(j)	Outfall TA-16-226		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(j2)	Outfall		Yes		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-026(k)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(r)	Outfall TA-16-180		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(s)	Outfall TA-16-5		No		RFI Work Plan	RFI Work Plan for OU 1082 Add 1	7/6/94
16-026(t)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95

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**NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)**

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
16-026(u)	Outfall TA-16-195		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(x)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(y)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-026(z)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-028(a)	South Drainage		Yes		RFI Report	RFI RPT TAs 11,13,16: PRSs 11-012(a,b), 13-003(a), 16-006(c,d), 16-010(a), 16-021(a), 16-026(c,d,v), 16-028(a), 16-030(g)	9/30/97
16-028(b)	Ind. or san. waste water treatment TA-16-370		Yes		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-029(f)	Sump from building 16-345		No		RFI Work Plan	RFI Work Plan I for OU 1082	7/15/93
16-030(a)	Ind. or san. waste water treatment		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-030(b)	Ind. or san. waste water treatment		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-030(c)	Ind. or san. waste water treatment		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-030(e)	Ind. or san. waste water treatment		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-030(f)	Ind. or san. waste water treatment		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-031(a)	Ind. or san. waste water treatment TA-16-372		Yes		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-031(b)	Ind. or san. waste water treatment TA-16-262		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-031(e)	Ind. or san. waste water treatment		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-031(f)	Ind. or san. waste water treatment		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-031(h)	Ind. or san. waste water treatment at P-Site		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-034(h)	Soil contamination area TA-16-137		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-034(i)	Soil contamination area		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-034(j)	Soil contamination area TA-16-139		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-034(k)	Soil contamination area		No		RFI Work Plan	RFI Work Plan for OU 1082 ADD. 2	7/5/95
16-034(m)	Soil contamination area		Yes		RFI Report	RFI RPT TA 16: 16-024(c, d, f, g, k, m, o, p, q, r, s), 16-025(b2, d, g, h, j, k, m, n, o, y), 16-034(c, d, e, f, l, m), C-16-005, C-16-017	9/30/97
16-034(n)	Soil contamination area		Yes		RFI Work Plan	RFI Work Plan for OU 1082 Add 1	7/6/94
18-002(a)	Firing site (inactive)		Yes		RFI Report	RFI Report Addendum for PRSs 18-002(a), 18-002(b), 18-003(a), 18-003(b), 18-003(c), 18-003(d), 18-003(e), 18-003(f), 18-003(g), 18-003(h), 18-004(a), 18-004(b), 18-005(a), 18-008, 18-010(b), 18-010(c), 18-010(d), 18-010(e), 18-010(f), 18-011, 18-012(a), 1	4/15/96
18-002(b)	Firing site (inactive)		Yes		RFI Report	RFI Report Addendum for PRSs 18-002(a), 18-002(b), 18-003(a), 18-003(b), 18-003(c), 18-003(d), 18-003(e), 18-003(f), 18-003(g), 18-003(h), 18-004(a), 18-004(b), 18-005(a), 18-008, 18-010(b), 18-010(c), 18-010(d), 18-010(e), 18-010(f), 18-011, 18-012(a), 1	4/15/96
18-003(c)	Septic system		Yes		VCM Plan	VCM Plan for PRSs 18-003(a-h)	3/19/99

**TABLE D-1  
NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)**

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
18-003(d)	Septic system		Yes		Status Report	Final Corrective Action Status Report for PRS 18-003(d), TA-18, Seventh & Eighth Quarters	3/1/99
18-003(e)	Septic system		Yes	Yes	VCM Plan	VCM Plan for PRSs 18-003(a-h)	3/19/99
18-003(f)	Septic system		Yes		VCM Plan	VCM Plan for PRSs 18-003(a-h)	3/19/99
18-003(g)	Septic system		Yes		VCM Plan	VCM Plan for PRSs 18-003(a-h)	3/19/99
18-003(h)	Septic system		Yes		VCM Plan	VCM Plan for PRSs 18-003(a-h)	3/19/99
18-005(a)	Storage area		Yes		RFI Report	RFI Report Addendum for PRSs 18-002(a), 18-002(b), 18-003(a), 18-003(b), 18-003(c), 18-003(d), 18-003(e), 18-003(f), 18-003(g), 18-003(h), 18-004(a), 18-004(b), 18-005(a), 18-008, 18-010(b), 18-010(c), 18-010(d), 18-010(e), 18-010(f), 18-011, 18-012(a), 1	4/15/96
18-007	Buried armored vehicle (does not exist)	April 2000 Permit Mod. Request	No		RFI Report	RFI RPT TA 18, 27: PRSs 18-001(a-c), 18-007, 27-001,27-003	1/25/95
18-012(a)	Outfall		Yes		RFI Report	RFI Report Addendum for PRSs 18-002(a), 18-002(b), 18-003(a), 18-003(b), 18-003(c), 18-003(d), 18-003(e), 18-003(f), 18-003(g), 18-003(h), 18-004(a), 18-004(b), 18-005(a), 18-008, 18-010(b), 18-010(c), 18-010(d), 18-010(e), 18-010(f), 18-011, 18-012(a), 1	4/15/96
20-001(a)	Landfill		Yes		RFI Report	RFI RPT TAs 20, 53, 72 : PRSs 20-001(a-c), 20-002(a-d), 20-003(b,c), 20-004, 20-005, 53-001(a,b,e,g), 53-002(a), 53-008, 53-010, 53-012(e), 72-001	3/18/96
20-002(d)	Firing site		Yes		RFI Report	RFI RPT TAs 20, 53, 72 : PRSs 20-001(a-c), 20-002(a-d), 20-003(b,c), 20-004, 20-005, 53-001(a,b,e,g), 53-002(a), 53-008, 53-010, 53-012(e), 72-001	3/18/96
20-003(a)	Control Building at a Firing site		No		RFI Work Plan	RFI Work Plan for OU 1100	5/25/94
20-005	Septic tank		Yes		RFI Report	RFI RPT TAs 20, 53, 72 : PRSs 20-001(a-c), 20-002(a-d), 20-003(b,c), 20-004, 20-005, 53-001(a,b,e,g), 53-002(a), 53-008, 53-010, 53-012(e), 72-001	3/18/96
21-002(a)	Container storage areas located throughout TA-21		No		RFI Work Plan	RFI Work Plan OU 1106	5/23/91
21-005	Disposal pit	June 2000 Permit Mod. Request	Yes		RFI Report	RFI Report for Potential Release Site 21-005	1/18/00
21-011(b)	Sump		No		RFI Work Plan	RFI Work Plan OU 1106	5/23/91
21-011(k)	Outfall		Yes		Interim Action Rep	Interim Action Report TA 21: PRS 21-011(k) HSWA	4/10/97
21-012(b)	Dry well		No		RFI Work Plan	RFI Work Plan OU 1106	5/23/91
21-013(c)	Surface disposal site		Yes	Yes	VCA Report	Final Voluntary Corrective Action Report HSWA: 21-013(c-e), 31-001	4/19/96
21-014	Material disposal area (MDA A)		Yes		RFI Work Plan	RFI Work Plan OU 1106	5/23/91
21-015	Material disposal area (MDA B)		Yes		RFI Work Plan	RFI Work Plan OU 1106	5/23/91

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**NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)**

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
21-024(a)	Septic system		Yes		RFI Report	Final Draft for the OU 1106 Addendum to Phase RPT 1B, 1C TA 21	1/30/95
21-024(b)	Septic system		Yes		RFI Report	Final Draft for the OU 1106 Addendum to Phase RPT 1B, 1C TA 21	1/30/95
21-024(c)	Septic system - PCB only site		Yes		RFI Report	Final Draft for the OU 1106 Addendum to Phase RPT 1B, 1C TA 21	1/30/95
21-024(d)	Septic system/VCA for rad		Yes	Yes	VCA Report	Final Voluntary Corrective Action Report HSWA: 21-024(d)	4/19/96
21-024(e)	Septic system		Yes	Yes	VCA Report	Final Voluntary Corrective Action Report HSWA: 21-024(e)	4/19/96
21-024(f)	Septic system		Yes		VCA Plan	Voluntary Corrective Action Plan for PRS 21-024(f) and C-21-015	7/14/99
21-024(g)	Septic system		Yes		RFI Report	Final Draft for the OU 1106 Addendum to Phase RPT 1B, 1C TA 21	1/30/95
21-024(h)	Septic system		Yes	Yes	VCA Report	Final Voluntary Corrective Action Report HSWA: 21-024(h)	4/19/96
21-024(i)	Septic system		Yes		RFI Report	Final Draft for the OU 1106 Addendum to Phase RPT 1B, 1C TA 21	1/30/95
21-024(j)	Septic system		Yes		RFI Report	Final Draft for the OU 1106 Addendum to Phase RPT 1B, 1C TA 21	1/30/95
21-024(k)	Septic system		Yes		RFI Report	Final Draft for the OU 1106 Addendum to Phase RPT 1B, 1C TA 21	1/30/95
21-024(n)	Drain line		Yes		RFI Report	Final Draft for the OU 1106 Addendum to Phase RPT 1B, 1C TA 21	1/30/95
21-024(o)	Drain line		Yes		RFI Report	Final Draft for the OU 1106 Addendum to Phase RPT 1B, 1C TA 21	1/30/95
21-027(a)	Ind. or san. waste water treat.		Yes		RFI Report	Final Draft for the OU 1106 Addendum to Phase RPT 1B, 1C TA 21	1/30/95
21-027(c)	Ind. or san. waste water treat.		Yes		RFI Report	Final Draft for the OU 1106 Addendum to Phase RPT 1B, 1C TA 21	1/30/95
21-029	Soil contamination area		Yes	Yes	RFI Work Plan	RFI Work Plan, Volume II, DP Tank Farm (PRS 21-029) [Compliance Order 98-01: Response to Ordered Action]	10/7/98
22-010(a)	Septic system		Yes		RFI Report	RFI RPT TA 06,7,8,22,40: 6-001(a,b), 6-003(a,c,f,g), 6-007(g), 6-008, 7-001(a,b,c,d), 8-002, 22-010(a,b), 22-014(a,b), 22-016, 40-005, C-6-019	9/29/97
22-011	Disposal pit		No		RFI Work Plan	RFI Work Plan for OU 1111	6/30/93
22-014(a)	Ind. or san. wastewater treat.		Yes		RFI Report	RFI RPT TA 06,7,8,22,40: 6-001(a,b), 6-003(a,c,f,g), 6-007(g), 6-008, 7-001(a,b,c,d), 8-002, 22-010(a,b), 22-014(a,b), 22-016, 40-005, C-6-019	9/29/97
22-014(b)	Sump		Yes		RFI Report	RFI RPT TA 06,7,8,22,40: 6-001(a,b), 6-003(a,c,f,g), 6-007(g), 6-008, 7-001(a,b,c,d), 8-002, 22-010(a,b), 22-014(a,b), 22-016, 40-005, C-6-019	9/29/97
22-015(a)	Drain lines and dry wells		Yes		RFI Report	RFI RPT TA 22: 22-012, 22-015(a,b,d,e)	9/12/97
22-015(b)	Sump and outfall		Yes		RFI Report	RFI RPT TA 22: 22-012, 22-015(a,b,d,e)	9/12/97
22-015(c)	Outfall		Yes		EC Plan	Expedited Cleanup Plan TA 22: PRS 22-015(c)	6/1/95

**TABLE D-1  
NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)**

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
26-001	Surface disposal site		No		RFI Work Plan	RFI Work Plan for OU1071	10/16/92
26-002(a)	Tank and/or assoc. equip.		No		RFI Work Plan	RFI Work Plan for OU1071	10/16/92
26-002(b)	Ind. or san. waste water treat.		No		RFI Work Plan	RFI Work Plan for OU1071	10/16/92
26-003	Septic tank		No		RFI Work Plan	RFI Work Plan for OU1071	10/16/92
27-001	Buried Naval Guns (does not exist)	April 2000 Permit Mod. Request	No		RFI Report	RFI RPT TA 18, 27: PRSs 18-001(a-c), 18-007, 27-001,27-003	1/25/95
27-002	Firing sites (inactive)		Yes		RFI Report	RFI Report Addendum for PRSs 18-002(a), 18-002(b), 18-003(a), 18-003(b), 18-003(c), 18-003(d), 18-003(e), 18-003(f), 18-003(g), 18-003(h), 18-004(a), 18-004(b), 18-005(a), 18-008, 18-010(b), 18-010(c), 18-010(d), 18-010(e), 18-010(f), 18-011, 18-012(a), 1	4/15/96
27-003	Bazooka impact area		Yes		RFI Report	RFI RPT TA 18, 27: PRSs 18-001(a-c), 18-007, 27-001,27-003	1/25/95
31-001	Outfall from sanitary Septic system		Yes	Yes	VCA Plan	VCA Plan for SWMU 31-001	9/15/95
32-001	Incinerator (former location)		Yes		VCA Plan	Voluntary Corrective Action Plan TA 32: PRSs 32-001, 32-003	3/15/96
32-002(a)	Septic tank (former location); drainlines		Yes		VCA Plan	Voluntary Corrective Action Plan TA 32: PRSs 32-002(a,b), 32-004	4/4/96
32-002(b)	Septic system		Yes		VCA Plan	Voluntary Corrective Action Plan TA 32: PRSs 32-002(a,b), 32-004	4/4/96
33-004(b)	Septic system		Yes		RFI Report	RFI RPT TA 33: PRSs 33-004(b,c,j,m), 33-006(a,b), 33-007(a,b), 33-010(a-d,g,h), 33-011(b,c), 33-014	12/22/95
33-004(c)	Septic system		Yes		RFI Report	RFI RPT TA 33: PRSs 33-004(b,c,j,m), 33-006(a,b), 33-007(a,b), 33-010(a-d,g,h), 33-011(b,c), 33-014	12/22/95
33-004(d)	Septic system		Yes		RFI Report	RFI RPT TA 33: PRSs 33-004(d,g,h,i), 33-005(a,b,c), 33-007(c), 33-010(e,f), 33-011(a,e), 33-012(a), 33-015	1/26/95
33-004(k)	Outfall		No		RFI Report	RFI RPT TA 33: PRSs: 33-002(b,c), 33-003(b), 33-004(k), 33-006(a), 33-008(a,b), 33-011(d), 33-013, 33-017	9/26/97
33-004(m)	Septic system		Yes		RFI Report	RFI RPT TA 33: PRSs 33-004(b,c,j,m), 33-006(a,b), 33-007(a,b), 33-010(a-d,g,h), 33-011(b,c), 33-014	12/22/95
33-009	Surface disposal - PCB only site		Yes		RFI Report	RFI RPT TA 33: MDA K PRSs 33-003(a), 33-004(a), 33-007(c), 33-009, 33-011(d), 33-013, 33-016, 33-017	9/29/95
33-010(b)	Surface disposal		Yes		RFI Report	RFI RPT TA 33: PRSs 33-004(b,c,j,m), 33-006(a,b), 33-007(a,b), 33-010(a-d,g,h), 33-011(b,c), 33-014	12/22/95
33-010(d)	Surface disposal		Yes		VCA Report	Voluntary Corrective Action Report TA 33: PRSs 33-010(a,d,g), 33-011(b)	6/13/96
33-010(g)	Surface disposal		Yes		VCA Report	Voluntary Corrective Action Report TA 33: PRSs 33-010(a,d,g), 33-011(b)	6/13/96
33-011(e)	Drum storage		Yes		RFI Report	RFI RPT TA 33: PRSs 33-004(d,g,h,i), 33-005(a,b,c), 33-007(c), 33-010(e,f), 33-011(a,e), 33-012(a), 33-015	1/26/95

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**NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
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PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
33-012(a)	Drum storage - PCB only site		Yes		RFI Report	RFI RPT TA 33: PRSs 33-004(d,g,h,i), 33-005(a,b,c), 33-007(c), 33-010(e,f), 33-011(a,e), 33-012(a), 33-015	1/26/95
33-013	Storage area		Yes		RFI Report	RFI RPT TA 33: PRSs: 33-002(b,c), 33-003(b), 33-004(k), 33-006(a), 33-008(a,b), 33-011(d), 33-013, 33-017	9/26/97
33-016	Sump		Yes	Yes	VCA Report	Final Voluntary Correction Action Report HSWA: 33-016	4/19/96
35-002	Material disposal area (MDA X)		No		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
35-004(a)	Storage areas		Yes		RFI Report	RFI RPT TA 35: PRS 35-004(a,b,g,h), 35-009(e), 35-016(e,f,i), 35-014(e2) 35-014(e2) counted as NFA in FY97 (addendum)	9/29/97
35-004(b)	Storage areas		Yes		RFI Report	RFI RPT TA 35, Aggregates D, E, F, H, I, U (No Further Action Proposals)	12/5/97
35-004(e)	Container storage area	April 2000 Permit Mod. Request	No		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
35-004(h)	Container storage area		No		RFI Report	RFI RPT TA 35: PRS 35-004(a,b,g,h), 35-009(e), 35-016(e,f,i), 35-014(e2) 35-014(e2) counted as NFA in FY97 (addendum)	9/29/97
35-006	Surface Impoundment	April 2000 Permit Mod. Request	Yes		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
35-009(a)	Septic system		Yes		RFI Report	RFI RPT TA 35, Aggregates D, E, F, H, I, U (No Further Action Proposals)	12/5/97
35-009(c)	Septic system		Yes		RFI Report	RFI RPT TA 35, Aggregates D, E, F, H, I, U (No Further Action Proposals)	12/5/97
35-009(d)	Septic system		Yes		RFI Report	RFI RPT TA 35, Aggregates D, E, F, H, I, U (No Further Action Proposals)	12/5/97
35-009(e)	Septic system		Yes		RFI Report	RFI RPT TA 35: PRS 35-004(a,b,g,h), 35-009(e), 35-016(e,f,i), 35-014(e2) 35-014(e2) counted as NFA in FY97 (addendum)	9/29/97
35-011(a)	Underground storage tank	April 2000 Permit Mod. Request	No		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
35-013(a)	Sump		No		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
35-013(b)	Sump		No		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
35-013(c)	Sump		No		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
35-013(d)	Floor Drains	April 2000 Permit Mod. Request	No		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
35-014(a)	Operational release		Yes		RFI Report	RFI RPT TA 35, Aggregates D, E, F, H, I, U (No Further Action Proposals)	12/5/97
35-015(a)	Soil contamination		Yes		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
35-016(m)	Drains and outfalls		Yes		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
35-016(o)	Drains and outfalls		Yes		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94

**TABLE D-1  
NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
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PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
35-016(p)	Outfall		Yes		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
36-001	Material disposal area (MDA AA)		Yes		Interim Action Rep	Interim Action Report TA 36: PRS 36-001, MDA AA Activities Approved 9/23/97 HSWA	8/15/96
36-002	Sump		Yes		RFI Report	RFI RPT TA 36: PRS 36-002	7/14/95
36-003(a)	Septic system		Yes	Yes	RFI Report	RFI RPT TA 36: PRSs 36-003(a), 36-003(b), 36-005, C-36-003	9/29/95
36-003(b)	Septic system, I-J site		Yes	Yes	VCA Report	Voluntary Corrective Action Report TA 36: PRS 36-003(b)	10/7/96
36-004(d)	Firing site (Lower Slabovia, Skunk works, Burn pit) - active		Yes		RFI Report	RFI RPT TA 36: PRSs 36-001, 36-004(d), 36-006 Denial 10/16/97 NMED Extension Approval received 8/25/98. Ph II SAP addressing deficiencies in TA-36 RFI Report now due 11/30/99.	6/21/96
36-005	Surface disposal site		Yes		RFI Report	RFI RPT TA 36: PRS 36-005 (Addendum)	9/30/97
39-001(a)	Landfill		Yes		RFI Report	RFI RPT TA 39: PRSs 39-001(a,b), 39-004(a-e), and 39-008	3/6/97
39-002(a)	Storage area		Yes		EC Plan	Expedited Cleanup Plan for SWMU 39-002(a)	6/1/95
39-004(a)	Firing site - active		Yes		RFI Report	RFI RPT TA 39: PRSs 39-001(a,b), 39-004(a-e), and 39-008	3/6/97
39-004(b)	Firing site - active		Yes		RFI Report	RFI RPT TA 39: PRSs 39-001(a,b), 39-004(a-e), and 39-008	3/6/97
39-004(c)	Active Firing site - TA-39-6 (Open Detonation) - RCRA Unit	Aug. 2000, Class 1 Permit Mod. Request	Yes		RFI Report	RFI RPT TA 39: PRSs 39-001(a,b), 39-004(a-e), and 39-008	3/6/97
39-004(d)	Active Firing site - TA-39-57 (Open Detonation) - RCRA Unit	Aug. 2000, Class 1 Permit Mod. Request	Yes		RFI Report	RFI RPT TA 39: PRSs 39-001(a,b), 39-004(a-e), and 39-008	3/6/97
39-004(e)	Firing site - active		Yes	Yes	RFI Report	RFI RPT TA 39: PRSs 39-001(a,b), 39-004(a-e), and 39-008	3/6/97
39-005	Seepage pit		Yes		RFI Report	RFI RPT TA 39: PRSs 39-002(a-f), 39-005, 39-006(a), 39-007(a,d)	4/28/95
39-006(a)	Septic system		Yes	Yes	RFI Report	RFI RPT TA 39: PRSs 39-002(a-f), 39-005, 39-006(a), 39-007(a,d)	4/28/95
39-007(a)	Storage area		Yes	Yes	VCA Report	Final Voluntary Corrective Action Report HSWA: 39-007(a)	4/19/96
40-001(b)	Septic system		Yes		RFI Work Plan	RFI Work Plan for OU 1111	6/30/93
40-001(c)	Septic system		Yes		RFI Work Plan	RFI Work Plan for OU 1111	6/30/93
40-003(a)	Scrap Detonation Site and Burn Area - Completed RCRA Closure	June 2000 Permit Mod. Request	No		Letter	NMED-HRMB Letter from E. Kelley, August 24, 1995. Approval of TA-40 scrap detonation final clean closure. (NMED 1995, 65408)	6/30/93
40-004	Operational release		No		RFI Work Plan	RFI Work Plan for OU 1111	6/30/93
40-005	Sump		Yes		RFI Report	RFI RPT TA 06,7,8,22,40: 6-001(a,b), 6-003(a,c,f,g), 6-007(g), 6-008, 7-001(a,b,c,d), 8-002, 22-010(a,b), 22-014(a,b), 22-016, 40-005, C-6-019	9/29/97
40-006(a)	Firing site (active)		Yes		RFI Work Plan	RFI Work Plan for OU 1111	6/30/93
40-006(b)	Firing site (active)		No		RFI Work Plan	RFI Work Plan for OU 1111	6/30/93
40-006(c)	Firing site (active)		No		RFI Work Plan	RFI Work Plan for OU 1111	6/30/93

T/ D-1  
**NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)**

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
40-009	Landfill		Yes		RFI Work Plan	RFI Work Plan for OU 1111	6/30/93
40-010	Surface disposal site		Yes		RFI Work Plan	RFI Work Plan for OU 1111	6/30/93
41-001	Septic system		Yes		RFI Work Plan	RFI Work Plan for Operable Unit (OU) 1098	6/4/93
43-001(a1)	Waste lines (Pre 1981)		No		RFI Work Plan	RFI Work Plan for OU 1136	5/23/94
43-002	Solid Waste Incinerator		No		RFI Work Plan	RFI Work Plan for OU 1136	5/23/94
46-002	Surface impoundment		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-003(a)	Septic system		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-003(b)	Septic system		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-003(c)	Septic system		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-003(d)	Septic system		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-003(e)	Septic system		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-003(f)	Septic system		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-003(g)	Septic system		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-003(h)	Operational release		Yes	Yes	RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-004(a)	Waste line		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-004(a2)	Outfall		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-004(b)	Operational release		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-004(b2)	Operational release		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-004(c)	Sump		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-004(c2)	Outfall		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-004(f)	Outfall		Yes		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-004(m)	Outfall		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-004(p)	Sump		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-004(q)	Outfall		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96

**TABLE D-1  
NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)**

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
46-004(r)	Outfall		Yes		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-004(s)	Outfall		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-004(t)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-004(u)	Outfall		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-004(v)	Outfall		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-004(w)	Outfall		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-004(x)	Outfall		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-004(y)	Outfall		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-004(z)	Outfall		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-005	Surface impoundment		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-006(a)	Operational release		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-006(b)	Operational release		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-006(c)	Operational release		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-006(d)	Operational release		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96

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**NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
 AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)**

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
46-006(f)	Storage area		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-006(g)	Operational Release		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-007	Operational Release		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-008(a)	Storage area		Yes		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-008(b)	Storage area		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
46-008(d)	Storage area		Yes		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-008(e)	Storage area		Yes		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-008(f)	Storage area		Yes		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-008(g)	Storage area		Yes		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-009(a)	Surface disposal		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-009(b)	Surface disposal		No		RFI Work Plan	RFI Work Plan for OU 1140	8/19/93
46-010(d)	Operation release SAA		Yes		RFI Report	RFI RPT TA 46: PRSs 46-003(h), 46-004(b,g,h,m,q,s,u,v,x,y,z,a2,b2,c2,d2,e2,f2), 46-006(a-d,f,g), 46-007, 46-008(b), 46-010(d), C-46-002, C-46-003	6/25/96
48-002(a)	Container storage area		Yes		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
48-002(b)	Container storage area		Yes		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
48-003	Septic system		Yes		RFI Report	RFI RPT TA 48: PRSs 48-001, 48-002(e), 48-003, 48-005, 48-007(a-d, f), 48-010	11/1/95
48-005	Waste lines		Yes		RFI Report	RFI RPT TA 48: PRSs 48-001, 48-002(e), 48-003, 48-005, 48-007(a-d, f), 48-010	11/1/95
48-007(b)	Drains and outfalls		Yes		RFI Report	RFI RPT TA48: PRS 48-002(e), 48-007(b,c,f)48-002(e) was counted as NFA in FY96 (addendum)	9/22/97
48-007(c)	Drains and outfalls		Yes		RFI Report	RFI RPT TA48: PRS 48-002(e), 48-007(b,c,f)48-002(e) was counted as NFA in FY96 (addendum)	9/22/97
48-007(f)	Drains and outfalls		Yes		RFI Report	RFI RPT TA48: PRS 48-002(e), 48-007(b,c,f)48-002(e) was counted as NFA in FY96 (addendum)	9/22/97
49-003	Leach field(Area 11 Radchem and small shot area)		Yes		RFI Report	RFI RPT TA 49: PRSs 49-002, 49-003, 49-004, 49-005(a,b), 49-006, 49-008(a,b,c)	8/25/97
49-004	Burn site and landfill (Area 6)		Yes		RFI Report	RFI RPT TA 49: PRSs 49-002, 49-003, 49-004, 49-005(a,b), 49-006, 49-008(a,b,c)	8/25/97
49-005(a)	Landfill (east of Area 10)		Yes		RFI Report	RFI RPT TA 49: PRSs 49-002, 49-003, 49-004, 49-005(a,b), 49-006, 49-008(a,b,c)	8/25/97

TABLE D-1  
 NON-CONSOLIDATED HAZARDOUS AND SOLID WASTE AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
 AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
49-006	Sump (Area 5)		Yes		RFI Report	RFI RPT TA 49: PRSs 49-002, 49-003, 49-004, 49-005(a,b), 49-006, 49-008(a,b,c)	8/25/97
50-001(a)	Active Waste treatment facility TA-50-1 - RCRA Unit	Aug. 2000, Class 1 Permit Mod. Request	Yes		RFI Work Plan	RFI Work Plan for OU 1147	5/20/92
50-002(a)	Underground tanks		Yes		RFI Work Plan	RFI Work Plan for OU 1147	5/20/92
50-006(a)	Operational release		Yes		RFI Report	RFI RPT TA 50: PRSs 50-006(a), 50-006(c), 50-007, 50-008	10/13/95
50-006(c)	Operational release		Yes		RFI Report	RFI RPT TA 50: PRSs 50-006(a), 50-006(c), 50-007, 50-008	10/13/95
50-006(d)	Effluent discharge		Yes		RFI Work Plan	RFI Work Plan for OU 1147	5/20/92
50-009	Material disposal area (MDA C)		Yes		RFI Work Plan	RFI Work Plan for OU 1147	5/20/92
50-011(a)	Septic system		Yes		RFI Work Plan	RFI Work Plan for OU 1147	5/20/92
52-001(d)	UHTREX equip.		No		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
52-002(a)	Septic system		Yes		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
53-001(a)	Storage area - PCB only site		Yes	Yes	RFI Report	RFI RPT TAs 20, 53, 72 : PRSs 20-001(a-c), 20-002(a-d), 20-003(b,c), 20-004, 20-005, 53-001(a,b,e,g), 53-002(a), 53-008, 53-010, 53-012(e), 72-001	3/18/96
53-001(b)	Storage area		Yes		RFI Report	RFI RPT TAs 20, 53, 72 : PRSs 20-001(a-c), 20-002(a-d), 20-003(b,c), 20-004, 20-005, 53-001(a,b,e,g), 53-002(a), 53-008, 53-010, 53-012(e), 72-001	3/18/96
53-005	Disposal pit		Yes		RFI Report	RFI RPT TAs 20, 53, 72 : PRSs 20-001(a-c), 20-002(a-d), 20-003(b,c), 20-004, 20-005, 53-001(a,b,e,g), 53-002(a), 53-008, 53-010, 53-012(e), 72-001	3/18/96
53-006(f)	Underground tank		No		RFI Work Plan	RFI Work Plan for OU 1100	5/25/94
53-007(a)	Aboveground neutralizer tank		No		RFI Work Plan	RFI Work Plan for OU 1100	5/25/94
54-001(a)	Storage area		Yes		RFI Report	RFI RPT TA 54: Channels from MDAs G,H, J, L (See Sed RFI RPT) PRSs 54-001(a,c,f), 54-002, 54-004, 54-005, 54-006, 54-007(a, c-e), 54-010, 54-012(a), 54-013(a,b), 54-014(b-d), 54-015(a, c-h, j, k.), 54-016(a), 54-017, 54-018, 54-019, 54-020, 54-021, C-51	2/27/96
54-004	Material disposal area (MDA H) except shaft 9		Yes		RFI Report	RFI Report for Material Disposal Areas G, H, and L at Technical Area 54	3/21/00
54-005	Material disposal area (MDA J) (Pits 1-5, Shafts 1-4)		Yes		RFI Report	RFI RPT TA 54: Channels from MDAs G,H, J, L (See Sed RFI RPT) PRSs 54-001(a,c,f), 54-002, 54-004, 54-005, 54-006, 54-007(a, c-e), 54-010, 54-012(a), 54-013(a,b), 54-014(b-d), 54-015(a, c-h, j, k.), 54-016(a), 54-017, 54-018, 54-019, 54-020, 54-021, C-51	2/27/96
54-006	Material disposal area (MDA L) (All subsurface units such as Pit A, SI B,C,D Shafts 1-28, 29-34)		Yes		RFI Report	RFI Report for Material Disposal Areas G, H, and L at Technical Area 54	3/21/00

NON-CONSOLIDATED HAZARDOUS AND SOLID W. AMENDMENTS POTENTIAL RELEASE SITES (PRS)  
AND MOST RECENT ASSOCIATED LOS ALAMOS NATIONAL LABORATORY DOCUMENT(S)

PRS Number	PRS Name	Status	Sampled?	Remedial Action Conducted?	Doc Type	Document Title	Date To NMED
54-007(a)	Septic system(tank and seepage trench)		No		RFI Report	RFI RPT TA 54: Channels from MDAs G,H, J, L (See Sed RFI RPT) PRSs 54-001(a,c,f), 54-002, 54-004, 54-005, 54-006, 54-007(a, c-e), 54-010, 54-012(a), 54-013(a,b), 54-014(b-d), 54-015(a, c-h, j, k.), 54-016(a), 54-017, 54-018, 54-019, 54-020, 54-021, C-51	2/27/96
54-007(b)	Septic system	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan for OU 1148	5/23/93
54-012(b)	Reduction site		No		RFI Work Plan	RFI Work Plan for OU 1148	5/23/93
54-015(h)	Storage area (drums)	April 2000 Permit Mod. Request	No		RFI Report	RFI RPT TA 54: Channels from MDAs G,H, J, L (See Sed RFI RPT) PRSs 54-001(a,c,f), 54-002, 54-004, 54-005, 54-006, 54-007(a, c-e), 54-010, 54-012(a), 54-013(a,b), 54-014(b-d), 54-015(a, c-h, j, k.), 54-016(a), 54-017, 54-018, 54-019, 54-020, 54-021, C-51	2/27/96
55-008	Sumps and tanks		No		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
55-009	Sumps and tanks		Yes		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
59-001	Septic system	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan Submittal OU 1114	7/7/93
60-002	Storage area		No		RFI Work Plan	RFI Work Plan Submittal OU 1114	7/7/93
60-005(a)	Surface impoundment -formerly 3-029(a)		Yes		RFI Report	RFI RPT for 53 PRSs in TAs 3,59,60,61	2/29/96
60-006(a)	Septic tank		Yes		RFI Report	RFI RPT for 53 PRSs in TAs 3,59,60,61	2/29/96
60-007(a)	Systematic or intent. prod. release		Yes		RFI Report	RFI RPT for 53 PRSs in TAs 3,59,60,61	2/29/96
60-007(b)	Systematic or intent. prod. release		Yes		RFI Report	RFI RPT for 53 PRSs in TAs 3,59,60,61	2/29/96
61-002	Transformer storage area - PCB only site		Yes		RFI Report	RFI RPT for 53 PRSs in TAs 3,59,60,61	2/29/96
61-004(a)	Septic tank	April 2000 Permit Mod. Request	No		RFI Work Plan	RFI Work Plan Submittal OU 1114	7/7/93
61-005	Landfill (LA County Municipal)		No		RFI Work Plan	RFI Work Plan Submittal OU 1114	7/7/93
61-006	Waste oil tank		No		RFI Work Plan	RFI Work Plan Submittal OU 1114	7/7/93
61-007	Transformer site - systematic leak - PCB only site		No		RFI Work Plan	RFI Work Plan Submittal OU 1114	7/7/93
63-001(a)	Septic system		Yes		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
63-001(b)	Septic system		No		RFI Work Plan	Addendum to OU 1129 RCRA RFI Work Plan	6/13/94
69-001	Solid Waste Incinerator and assoc. equip.		Yes	Yes	VCA Plan	VCA Plan PRSs C-9-001, 69-0019/23/1997	8/18/95
73-004(c)	Septic tank		Yes		RFI Report	NFA RPT TA 00, 73: PRS 0-034(a,b), 73-001(b), 73-004(c,d)	9/30/97
C-08-010	Building		Yes		RFI Report	RFI RPT TAs 8, 9: PRSs 8-004(d), 8-009(d,e), C-8-010, 9-001(a,b,d), 9-003(g-i), 9-005(a,d), 9-008(b), 9-009	3/15/96
C-09-001	Soil contamination		Yes	Yes	VCA Report	Final Voluntary Correction Action Report HSWA: C-9-001, 69-001	4/19/96
C-36-003	Storm drainages		Yes		RFI Report	RFI RPT TA 36: PRSs 36-003(a), 36-003(b), 36-005, C-36-003	9/29/95

**ATTACHMENT E**

**PROGRAMMATIC AGREEMENT FOR THE MANAGEMENT  
OF HISTORIC PROPERTIES AT  
LOS ALAMOS NATIONAL LABORATORY, NM**

**Advisory  
Council On  
Historic  
Preservation**

*Don  
Sie*

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The Old Post Office Building  
1100 Pennsylvania Avenue, NW, #809  
Washington, DC 20004

Reply to: 12136 West Bayaud Avenue, #330  
Lakewood, Colorado 80226

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April 26, 2000

David A. Gurule, P.E.  
Area Manager  
Department of Energy  
Albuquerque Operations Office  
Los Alamos Area Office  
Los Alamos, NM 87544

REF: *Programmatic Agreement for the management of historic properties at Los Alamos  
National Laboratory, NM*

Dear Mr. Gurule:

The enclosed Programmatic Agreement (PA) regarding the referenced project has been executed by the Council. This action constitutes the comments of the Council required by Section 106 of the National Historic Preservation Act and the Council's regulations. Please provide a copy of the fully-executed PA to the other signatories and your Federal Preservation Officer.

The Council appreciates your cooperation in reaching a satisfactory resolution of this matter. Should you have any questions, contact me at (303) 969-5110.

Sincerely,

*Jane M. Crisler*

Jane M. Crisler  
Historic Preservation Specialist  
Office of Planning and Review

Enclosure

**Programmatic Agreement  
MOU DE-GM32-00AL77152**

**Between**

**The U.S. Department of Energy Los Alamos Area Office,**

**And**

**The New Mexico State Historic Preservation Office  
Concerning Management of the Historic Properties of  
Los Alamos National Laboratory, New Mexico**

**WHEREAS**, the U.S. Department of Energy, Los Alamos Area Office (DOE-LAAO) has responsibility for the management of all historic properties at Los Alamos National Laboratory (LANL) that have either been determined eligible for listing in the National Register of Historic Places (Register) or are awaiting eligibility assessments, pursuant to Section 110 of the National Historic Preservation Act (NHPA) as amended, and must assess the effect of any Federal undertaking upon historic properties included in or eligible for the Register pursuant to Section 106 of NHPA, and

**WHEREAS**, DOE-LAAO has determined that the mission of LANL as a scientific laboratory, with its associated operation, maintenance, research, development, waste management, and decontamination/decommissioning activities, may have both direct and indirect effects on historic properties included in or eligible for the Register, and

**WHEREAS**, DOE-LAAO has consulted with the New Mexico State Historic Preservation Officer (SHPO) in accordance with the Substitution Agreement between the Advisory Council on Historic Preservation (Council) and the SHPO Under 36 CFR Part 800.7 (Substitution Agreement),

**NOW, THEREFORE**, DOE-LAAO, the SHPO, and the Council agree that LANL activities that have the potential to affect historic properties included in or eligible for the Register shall be administered in accordance with this Programmatic Agreement (PA) to satisfy DOE-LAAO's responsibilities under Sections 106 and 110 of the National Historic Preservation Act. For purposes of this PA, the term "including" shall mean, "including but not limited to."

**I. Duration of PA**

This PA will be effective for five years for the date of signature by all parties, or until the LANL Cultural Resource Management Plan (CRMP) is accepted by the SHPO and the Council and is effective, whichever occurs first. If After 5 years a CRMP is not so accepted, this PA may be extended by mutual written agreement of the Parties.

## **II. Development and Content for the CRMP**

- A. Within 5 years from the date of this Agreement, the DOE-LAAO will develop a CRMP to replace this PA. DOE-LAAO will follow *Environmental Guidelines for Development of Cultural Resource Management Plans* (August 1995, DOE/EH-0501), and in consultation with the Council and the SHPO.
- B. The DOE-LAAO will provide complete draft copies of the CRMP to the SHPO and the Council for review and acceptance, disagreements being resolved in accordance with dispute resolution procedures defined in the Substitution Agreement.
- C. Upon acceptance of the CRMP by the SHPO and the Council, the DOE-LAAO will implement it in lieu of this PA. This PA will expire upon such acceptance.
- D. The CRMP's scope will include:
  - 1. Development of appropriate historic context statements including, but not limited to a Manhattan Project and Early Cold War Context Statement (1943-1956);
  - 2. Development of an Oral History program;
  - 3. Development of public outreach/interpretation options;
  - 4. Completion of Native American Coordination and Consultation protocols;
  - 5. Development of an archaeological research design and significance criteria for the identification, evaluation and management of sites to be included in the National Register of Historic Places (NRHP);
  - 6. Continuation of a Laboratory-wide historic properties identification and evaluation effort, prioritized by risk to the historic resources from mission related activities. Evaluation efforts will focus on the Manhattan Project and Early Cold War properties (1943-1956) and those key facilities of exceptional importance to be identified in the CRMP such as the Los Alamos Neutron Science Center. Evaluation efforts will be based on the application of the criteria for eligibility established in 36 CFR Part 60 and concepts presented in the Council guidance, *Balancing Historic Preservation Needs with the Operation of Highly Technical or Scientific Facilities* (1991).
- E. The DOE-LAAO shall consult with the SHPO and the Council if DOE-LAAO proposes changes to the CRMP following its implementation.

## **III. Applicability**

- A. Pending development and implementation of the CRMP, the following review and reporting measures will be carried out in lieu of procedures set forth in 36 CFR Part 800 and in accordance with Section 106 of the National Historic Preservation Act, as stipulated in Subpart C, Program Alternatives (36 CFR Part 800.14).

- B. This PA addresses a subset of the historic properties present at LANL. Specifically it covers prehistoric and historic archaeological sites, and buildings and structures dating to the Manhattan Project and early Cold War (1943-1956). The use of the date of 1956, as the end of the early Cold War period, marks the completion of all fundamental nuclear weapons design at LANL. After 1956, LANL research focused on the engineering of nuclear weapons to fit specific delivery systems. Additionally, 1956 was the last year that the Los Alamos Atomic Energy Community was a closed facility. The identification, evaluation, and treatment of buildings predating 1943 at LANL, will be accomplished in compliance with Sections 800.4 through 800.6 of 36 CFR Part 800 and other applicable federal and state laws and regulations. Identification, evaluation, and treatment of properties constructed at LANL after 1956 will be handled pursuant to the regulations in effect at the time such properties are eligible for review (using existing guidelines, when a property reaches 50 years of age or when a property may be of exceptional historical significance). Prehistoric and historic archeological sites will be identified, evaluated and treated according to the stipulations contained in Appendix A of the Substitution Agreement unless modified below.
- C. Upon acceptance of the CRMP by the SHPO, DOE-LAAO will implement it in lieu of compliance procedures contained in this PA.

#### **IV. Identification, Inventory, and Evaluation**

- A. Employing the criteria for listing in the National Register of Historic Places (Register), as well as historic contexts and themes developed at LANL, DOE-LAAO will identify historic resources using standardized field survey forms developed by LANL and reviewed by Parties. DOE-LAAO will evaluate resources so identified for listing in the Register. These resources include, but are not limited to, buildings, structures, experimental areas, and discrete groupings of buildings, i.e., districts. Documentation for properties deemed eligible and ineligible for the Register will be provided to the SHPO for comment.
- B. Historic contexts and themes developed for the years 1943 through 1956 at LANL will be included in the CRMP under development. Pending completion of the CRMP, DOE-LAAO will identify and evaluate resources that were constructed between 1943 and 1963 (signing of the Limited Test Ban Treaty) for proposed undertakings. Resources less than 50 years of age may be eligible as exceptionally significant as defined in 36 CFR Part 60, Criteria A, Consideration G.
- C. Exemptions: Appendix A lists property types that are exempt from identification and evaluation for inclusion on the Register.

**V. Management, Protection and Reporting Requirements**

- A. Historic resources eligible for the Register (those that are at least 50 years old or that meet the exceptional significance criteria), or that have not yet received eligibility determinations will not be intentionally transferred, sold, demolished, substantially altered, or allowed to deteriorate significantly from their current condition from the date that this PA is signed.
- B. LANL undertakings will be reviewed by LANL in order to take into account effects, if any, to historic properties. This review will follow 36 CFR Parts 800.4-800.6 for buildings and structures, and Appendix A of the Substitution Agreement for historic and prehistoric archeological sites.
- C. While the CRMP is under development, LANL undertakings determined to have no direct or indirect effect on historic properties because no historic properties are present in the area of potential effect (APE) will be reported on a quarterly basis to the SHPO with documentation for review and comment. These “no property, no effect” projects will be allowed to proceed once the determination of no effect is made by an historic preservation professional as defined in the Secretary of Interior’s Standards and Guidelines for Archeology and Historic Preservation, documented and concurred with by DOE-LAAO.
- D. LANL undertakings, which are determined to have no direct or indirect effect on historic properties because all Register eligible properties will be avoided by project activities, will be reported on a project by project basis to the SHPO with documentation for review and comment. These projects may proceed once the determination of no effect is made by an historic preservation specialist, documented and concurred with by DOE-LAAO. The SHPO may submit comments within 30 days and DOE-LAAO will make a good faith effort to consider them. If the project has already been completed, the SHPO comments will be taken into consideration in the future when a similar “no effect through avoidance” project is proposed.
- E. LANL undertakings involving the remodeling or modification to interior rooms of administrative or support buildings built after 1945 will be considered to have “no adverse effect” and allowed to proceed. Documentation and supporting justification for the determination will be provided by DOE-LAAO to the SHPO on a quarterly basis. LANL undertakings involving non-administrative or support buildings will be evaluated through the application of 36 CFR part 800.5 - 800.6 Assessment and Resolution of Adverse Effects.
- F. For undertakings that may have an effect on historic and prehistoric archeological sites, DOE-LAAO will follow the procedures contained in Appendix A of the Substitution Agreement to reach a determination of “no adverse effect” and will be allowed to proceed.

- G. All LANL undertakings determined to have an adverse effect to Register eligible historic properties, regardless of the time period of significance, will follow the procedures described in 36CFR 800.6.
- H. Historically significant equipment and "artifacts" associated with historic properties will be identified prior to any removal or demolition action. These artifacts may have interpretive or educational value as exhibits within local, state, or national museums and will be curated if feasible, as appropriate, at LANL. Museums will be notified of the availability of artifacts.

#### **VI. Programmatic Exemptions for National Register Eligible Historic Properties**

The property types described in Appendix A are exempt from the requirements of identification and evaluation. The activities described in Appendix B, namely, emergency activities, routine maintenance and other activities, and undertakings relating to buildings and structures constructed since 1963, are exempt from Historic Preservation Review according to the terms of Appendix B.

#### **VII. American Indian Involvement in Consultation**

DOE-LAAO will consult with the governors of the pueblos of Cochiti, Jemez, San Ildefonso, and Santa Clara, and the President of the Mescalero Apache Tribe and all other Native American tribal organizations that express an interest to be consulted regarding identification of potential effects to archaeological and/or traditional cultural properties which may result from LANL undertakings such as ground disturbing activities, the demolition, substantial alteration, or deterioration of historic buildings and structures that are eligible for listing in the Register or issues of concern pertinent to such properties. DOE-LAAO will consider the concerns of the four pueblos and the Mescalero Apache in the implementation of this PA.

#### **VIII. Interested Person Participation**

- A. DOE-LAAO will seek and consider views of the public in carrying out the terms of this PA in a manner consistent with 36 CFR Part 800.
- B. Information concerning proposed undertakings subject to the terms of this agreement shall be made available in LANL's Outreach Center in downtown Los Alamos, or disseminated to the Public in a way that is mutually acceptable to the parties.
- C. Nothing in this PA will be interpreted as limiting or otherwise hindering cooperative efforts regarding historic preservation between DOE-LAAO and other interested individuals or groups. All forms of cooperation are encouraged.

#### **IX. Agreement Review**

- A. Any party may request a review of this PA. The parties will consult concerning any proposed changes in a matter consistent with the Substitution Agreement. The parties may revise or amend this PA by written agreement of all parties.

B. The SHPO may monitor activities carried out pursuant to the PA, and the Advisory Council on Historic Preservation may review such activities if so requested in accordance with Appendix A, sec. 5 of the Substitution Agreement. DOE-LAAO will cooperate with the Advisory Council on Historic Preservation and the SHPO in carrying out their monitoring and review responsibilities.

**X. Termination**

Any party to this PA may terminate it by providing 60 days notice to the other party providing that both parties will consult during the period prior to termination to seek agreement on amendments or other actions that would avoid termination. In the event of termination, DOE-LAAO will comply with 36 CFR Part 800 until the CRMP is approved and in place.

**XI. Dispute Resolution**

The DOE-LAAO and the SHPO shall jointly attempt to resolve any disagreement arising from implementation of this PA. If the DOE-LAAO determines that the disagreement cannot be resolved, the DOE-LAAO shall request the further comments of the Advisory Council on Historic Preservation in accordance with Appendix A, sec. 6 of the Substitution Agreement.

Execution of this PA, and the implementation of its terms, evidences that DOE-LAAO has afforded the SHPO an opportunity to comment on the effects of its activities on historic properties as defined herein, and that DOE-LAAO has taken into account the effects of such undertakings on these historic properties.

NEW MEXICO STATE HISTORIC PRESERVATION OFFICER

By: Jan U Biella, Acting SHPO Date: 4/14/2000

U.S. DEPARTMENT OF ENERGY, LOS ALAMOS AREA OFFICE

By: David A. Gurulé Date: 8/17/00  
David A. Gurulé, P.E., Area Manager

THE ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: Alan W. Fowler Date: 4/24/08

**Appendix A**  
**Property types exempt from identification and evaluation requirements**

- A. Structures with minimal or no visible surface manifestations (i.e., pits, underground storage tanks, underground vaults, buried material disposal areas, septic tanks, underground pipelines, sewer lines, and steam, storm, water, acid, or electrical manholes).
- B. Above ground fuel tanks.
- C. Wells and bore holes
- D. Road-block barriers and siren poles
- E. Transformer and pressure relief valve stations
- F. Mobil trailers and modular buildings and enclosures- these structures are used either as mobile trailers that are moved on site, or premanufactured sides and roofs typically resting on poured concrete pads. They serve as temporary administrative support office space or storage facilities. Most have been brought on site over the last 25 years. Temporary structures dating to the period 1943-1956 will receive consideration under Stipulation II (A) above.

## Appendix B

### Activities exempt from Historic Preservation Review: emergency activities, routine maintenance activities, and buildings/structures constructed after 1963

- A. The following activities will not be subject to review pursuant to this PA:
1. Emergency or repair work to minimize hazards to human health or to the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous materials, hazardous waste, or hazardous constituents to air, soil, or surface water. Assessment and documentation of effects on eligible historic properties shall be performed when conditions allow for such investigation.
  2. In the event of declared disasters, emergencies, or national security treats, DOE-LAAO may base its actions on 36CFR800.12, which allows the waiver of NHPA requirements if a Federal agency head proposes emergency actions as an essential and immediate response to a major natural disaster or other catastrophe of similar severity, or imminent treat to nation security.
- B. The following undertakings will not be subject to review pursuant to this PA provided that (a) they do not affect those qualities that make a historic property eligible for the Register and, (b), that they do not involve ground disturbing activities as determined by qualified preservation professionals as defined by the Secretary of Interior's Professional Standards (36 CFR Part 61). If one of the following undertakings has the potential to affect the qualities that make a historic property eligible for the Register, the undertaking will be reviewed following the procedures set forth in paragraphs III-VIII.
1. General Equipment:  
Replacement or removal of equipment or facility components.
  2. Process and Lab Equipment:  
Installation, maintenance, repair, storage, relocation, removal, or replacement of process or laboratory equipment and associated systems.
  3. Water Systems:  
Siting, installation, maintenance, repair, removal, and operation of plant water systems including, but not limited to: water wells, cooling water systems, potable water systems, storm sewers, waste water treatment systems, plant drainage, and plumbing.
  4. Electrical Systems:  
Installation, maintenance, repair, removal, or replacement of plant and building electrical systems including, but not limited to: switchyards, building conduit,

wiring and lighting, emergency lighting, circuits and wiring, meters, transformers, utility poles, crossarms, and insulators and downed transmission lines.

5. Communications and Computer Systems:  
Siting, installation, maintenance, repair, removal, or replacement of communications and computer systems, microwave/radio systems, fiber optic cables, phone systems, and computers and peripheral systems including transmitters.
6. Routine Service Activities:  
Mowing and trimming grass, shrubs, or trees; moving and assembling furniture and equipment; snow removal; routine vegetation and erosion control activities; janitorial and housekeeping services; small scale use of pesticides; small scale road, sidewalk, and parking lot repair; maintenance and repair of vehicles and heavy equipment; maintenance of safe/vaults and locks; busing and transportation; maintenance and repair of fencing; maintenance, repair, or installation of indoor or outdoor signs; construction of scaffolding; and routine decontamination of tools, surfaces, and equipment.
7. Waste Treatment, Storage and Disposal Activities:  
Operation and maintenance of waste treatment, storage, and disposal facilities; maintenance of landfills; spill cleanup activities; maintenance, repair, or replacement of liquid retention tanks, dikes, and piping; and maintenance or repair of lagoons and small basins.
8. Repair and Maintenance of Buildings:  
Maintenance, repair, modification, or direct in kind replacement or refinishing associated with structures or buildings including: painting, siding, mounting and hanging wall items; ceiling, wall, window, floor, and floor covering repair/replacement; cabinet and shelf fabrication and installation; and elevator repair.
9. Occupational Safety and Health Act Regulations and Permit Compliance:  
Installation, maintenance, repair, or replacement of equipment used in current operations designed to maintain compliance with permits and Occupational Safety and Health Act regulations and Americans With Disabilities Act regulations.
10. Hazard Prevention:  
Installation and maintenance required for hazard prevention including: fabrication, removal, installation, and repair of safety railings, machine guards, hand rails, guard rails, ladders, frames, and fences; installation of nonskid surfaces and anchoring floor mats; and grounding of structures and equipment.

**11. Security Systems:**

Installation, maintenance, removal, and repair of security systems, including computer security, detection, monitoring, surveillance, and alarm systems.

**12. Heating and Air Conditioning Systems:**

Installation, maintenance, removal, repair, or replacement of heating, ventilating, air conditioning systems, and high efficiency particulate air filters.

**13. Steam Condensate/Chemical Treatment Systems:**

Modification to steam/condensate systems including, but not limited to repair or replacement of associated piping, pumps, and condensers to maintain system integrity; extension of systems to accommodate new construction or building modification; and repair of any associated chemical treatment systems.

**14. Fire Protection Systems:**

Routine upgrades and modifications to fire protection systems including fire alarm systems, smoke detectors, and sprinkler systems.

**15. Removal of Asbestos:**

Asbestos removal and renovation activities, including cleanup, encapsulation, and removal and/or disposal of asbestos-containing materials from existing buildings and structures.

**16. Removal of Polychlorinated Biphenyl Contaminated Items:**

Removal of Polychlorinated Biphenyl contaminated items such as electrical transformers and capacitors possibly requiring temporary removal of walls, ceilings, fences, power lines, or other obstacles which would prevent forklift or crane access to the item targeted for removal.

**17. Personnel Safety:**

Installation or modification of personnel safety systems and devices including, but not limited to: safety showers, eye washes, emergency exit lighting systems, emergency ingress/egress routes; protective additions to electrical equipment; personnel accountability/assembly systems and stations; improvements to walking and working surfaces or areas; fabrication and installation of platforms, rails, shields and guards; and stairway modifications and installations.

- C. Undertakings in or associated with buildings and structures constructed after 1963 will not be reviewed pursuant to this PA, except for those properties built since that time that have been determined eligible for inclusion in the Register because of their "exceptional importance". Post-1956 properties eligible for the Register will be managed in the same way as the other eligible historic properties covered by this PA.**

**ATTACHMENT F**

**COPY OF LETTER FROM  
THE U.S. FISH AND WILDLIFE SERVICE**



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, New Mexico 87113  
Phone: (505) 346-2525 Fax: (505) 346-2542

February 12, 1999

Cons. #2-22-98-I-336

Cons. #2-22-95-I-108

David A. Gurule, Acting Area Manager  
Department of Energy  
Albuquerque Operations Office  
Los Alamos Area Office  
Los Alamos, New Mexico 87545

Dear Mr. Gurule:

This responds to your letter dated August 6, 1998, requesting our review and concurrence with the Threatened and Endangered Species Habitat Management Plan (HMP) for Los Alamos National Laboratory (LANL). The HMP was prepared by the LANL Ecology Group for the Department of Energy (DOE) as part of the Dual-Axis Radiographic Hydrodynamics Test Facility (DAHRT) Mitigation Action Plan. The U.S. Fish and Wildlife Service (Service) has worked closely with LANL in the development of the HMP. As a result of discussions and meetings following the August 6, 1998, submittal, additional information/clarification was provided via letters, updated Biological Evaluations/HMPs, and e-mail messages, dated September 8, October 20, November 25, and December 9, 1998, and January 4, January 22, and January 29, 1999. The purpose of the HMP is to provide for the protection of threatened and endangered species and their habitats on LANL. The HMP consists of three components that must be used together to assure proper management of the threatened and endangered species: an Overview Document, Site Plans, and Monitoring Plans. It was determined that if all the restrictions and protective measures outlined in the HMP are strictly followed, the implementation of this HMP may affect, but is not likely to adversely affect the Mexican spotted owl (owl), peregrine falcon (falcon), bald eagle (eagle), and southwestern willow flycatcher (flycatcher). The Biological Evaluation (BE) also considered potential impacts on the black-footed ferret, arctic peregrine falcon, and whooping crane. It was determined that there would be no effect on these species because of a lack of habitat.

Property at LANL varies from remote isolation to heavily developed and/or industrialized. The Service agrees, as stated in the Overview document, that a number of activities at LANL have the potential to adversely impact threatened and endangered species. Many of the industrial processes used at LANL have involved hazardous and radioactive materials. These materials as well as remediation of potential release sites may disturb

or reduce population viability of threatened and endangered species. In addition, other potential sources of disturbance or habitat alterations are possible as a result of the residential and commercial development in the LANL area. While the HMP identifies potential sources of adverse effects, this consultation does not necessarily cover all of those impacts. The Service does not anticipate that DOE will be able to plan all of its operations at LANL in accordance with this plan. The direct effects of most actions can be minimized through implementation of the HMP; however, a more thorough assessment is necessary to adequately evaluate the indirect and cumulative impacts of all actions that are funded, authorized, and permitted by DOE, as well as potential impacts from interrelated and interdependent actions. It was agreed (by Service, DOE, and LANL personnel) that consultation concerning ongoing LANL operations would be handled separately from the HMP, under the consultation on the Site-Wide EIS.

The Site Plans identify the particular areas of LANL where operations might impact known occupied or potential habitat for the flycatcher, eagle, falcon, and owl. Suitable habitat for these species, along with protective buffer areas surrounding their habitat, have been designated as Areas of Environmental Interest (AEIs). For the flycatcher, one AEI was established based on an observation of a migrant male flycatcher in 1997. The AEI is located in the Pajarito wetland area and includes the best available riparian habitat. For eagles, one AEI has been identified for wintering habitat that exists along the Rio Grande on the eastern edge of LANL. It is based on the locations of known and potential roost sites. For the falcon, four AEIs have been identified. They consist of the habitat previously identified under the 1985 interagency agreement. These areas are centered on deep canyons on the eastern side of LANL or on adjacent lands. LANL has agreed to implement the recommended management guidelines, which utilize four management zones (A through D) to protect nesting peregrine falcons from disturbance. For the owl, six AEIs have been identified, but only one of these sites is known to be occupied. These AEIs are based on and located in canyons that have been defined as suitable nest/roost habitat.

The AEI management section of each Site Plan provides guidelines for LANL operations to reduce or eliminate threats to each species. The primary threats on LANL property are (1) impacts on habitat quality from LANL operations and (2) disturbance of nesting or roosting birds. The site plans provide information on their location and guidelines for their management. The AEI Site Plans consist of a species description, descriptions of the AEIs for the species, descriptions of current impacts in the AEIs, management plans that describe allowable activities within core and buffer areas under the guidelines of the sites plan and protective measures. Activities discussed in the site plans include day to day activities, such as access into an AEI, as well as long-term projects, such as levels of habitat alteration in the buffer area of an AEI. Restrictions will be implemented on activities that could cause disturbance (people, vehicles and machinery, aircraft, light production, and noise) within occupied AEIs. The location of a potential disturbance activity within the AEI, the occupancy status of the AEI, and the type of activity all affect whether or not an activity is allowable. Habitat alterations are always restricted in core areas, but a limited amount of future development is allowed in currently undeveloped DOE-controlled buffer areas under the guidelines of this site plan as long

as it does not alter habitat in the undeveloped AEI (including light and noise guidelines). The purpose of buffer areas is to protect core areas from undue disturbance or habitat alteration or habitat degradation. Each AEI is specific to the situation or circumstances of the site it covers. According to the HMP, development beyond the cap established for each AEI, or greater than 2 hectares in size, including the developed-area border, requires independent review for ESA compliance.

Varying amounts of development and/or ongoing activities exist in the cores and buffers of each AEI. These developments may include residential, commercial, and light industrial areas, as well as roads and utility corridors. Existing/ongoing activities may include periodic scientific surveys, power line maintenance, recreational use, residential development, ER Program activities, and possible use of a firing site. Potential disturbance may be associated with automobile and truck traffic, construction activities, a live-fire range, explosives testing, and aircraft traffic at the County airport. Ongoing activities in developed areas constitute a baseline condition for the AEIs and are not restricted. New activities including further development within already existing developed areas are not restricted unless they impact undeveloped portions of an AEI core. If a proposed action within a developed area does not meet site plan guidelines, it must be individually reviewed for ESA compliance.

Some activities such as utility corridor maintenance, fuels management, and a limited amount of development are allowed in each AEI (as described in the HMP). The potential impacts of these activities are considered to be insignificant or discountable because they will occur in habitat that has been previously disturbed or is of poor quality due to its size or proximity to already developed areas. It is our understanding (based on the January 22, 1999, e-mail response from Terry Foxx) that the fuels management activities within the owl AEIs will only consist of ongoing and proposed fire protection activities around existing facilities (e.g. thinning around buildings) or those activities that are already covered under the Dome Fire Emergency BA. The other fire management activities mentioned in the HMP will go through the ESH-ID process and further consultation with the Service when a fire management plan is completed in the future.

In general, activities that detrimentally alter habitat in an AEI or would cause unacceptable disturbance to the species inhabiting the AEI are not allowed under the guidelines of a Site Plan. The Site Plans are designed to minimize impacts to threatened and endangered species and their habitat. The protective measures and restrictions outlined in the Site Plans were developed using the best available data, in cooperation with Service biologists.

The U.S. Fish and Wildlife Service concurs with DOE's determination that implementation of LANL's HMP may affect, but is not likely to adversely affect the Mexican spotted owl, American peregrine falcon, bald eagle, and southwestern willow flycatcher based on the protective measures described in the BA and HMP. If all the restrictions and protective measures outlined in the HMP are strictly followed, potential impacts on owls, falcons, eagles, and flycatchers are expected to be insignificant or

David A. Gurule, Acting Area Manager

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discountable for the following reasons: 1) appropriate seasonal restrictions will be implemented to avoid disturbance to potentially breeding flycatchers, peregrines, and owls and wintering eagles; 2) no nest or roost habitat for any listed species will be altered; 3) the total amount of potential foraging habitat that could be impacted within each species home ranges is expected to be insignificant compared to the amount of available foraging habitat throughout the area; 4) monitoring plans have been developed as an integral part of the HMP; and 5) a mechanism for incorporating necessary technical and regulatory changes and updating the HMP has been included (page 32 of the Overview Document).

In future communications regarding this project, please refer to Consultation #2-22-98-1-336. If we can be of further assistance, please contact Carol Torrez of my staff at (505) 346-2525, ext. 115.

Sincerely,



Jennifer Fowler-Propst  
Field Supervisor

cc:

Teralene Foxx, Project Manager, Ecology Group, Los Alamos National Laboratory,  
P.O. Box 1663, Mail Stop M887, Los Alamos, New Mexico 87545

Elizabeth Withers, U.S. Department of Energy, Los Alamos Area Office, 35<sup>th</sup> Street, Los  
Alamos, New Mexico

Field Supervisor, Ecological Services, U.S. Fish and Wildlife Service, Phoenix,  
Arizona

**ATTACHMENT G**

**TABLE OF INFORMATION SOURCES FOR SOLID WASTE  
MANAGEMENT UNITS**

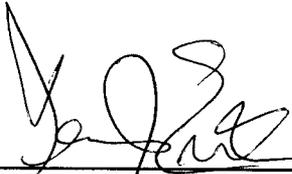
**TABLE G-1**

**INFORMATION SOURCES FOR SOLID WASTE MANAGEMENT UNITS**

<b>40 CFR §270.14(d) INFORMATION REQUIREMENTS FOR SOLID WASTE MANAGEMENT UNITS</b>	<b>DOCUMENT(S) WHERE INFORMATION FOUND</b>	<b>COMMENTS</b>
<i>(1)(i) The location of the unit on the topographic map required under paragraph (b)(19) of this section.</i>	SWMU Report RFI (Operable Unit) Work Plan VCA/VCM Report (if completed) RFI Report (if completed)	Each document type contains its own maps which, taken collectively, provide a more detailed SWMU location than if provided on a map submitted under paragraph (b)(19) of this section.
<i>(ii) Designation of type of unit.</i>	SWMU Report RFI (Operable Unit) Work Plan VCA/VCM Report (if completed) RFI Report (if completed)	Level of detail and information quality is highest in VCA/VCM/RFI (if available); medium in RFI Work Plan; limited in SWMU report.
<i>(iii) General dimensions and structural description (supply any available drawings).</i>	SWMU Report RFI (Operable Unit) Work Plan VCA/VCM Report (if completed) RFI Report (if completed)	Level of detail and information quality is highest in VCA/VCM/RFI (if available); medium in RFI Work Plan; limited in SWMU report.
<i>(iv) When the unit was operated.</i>	SWMU Report RFI (Operable Unit) Work Plan VCA/VCM Report (if completed) RFI Report (if completed)	Level of detail and information quality is highest in VCA/VCM/RFI (if available); medium in RFI Work Plan; limited in SWMU report.
<i>(v) Specification of all wastes that have been managed at the unit, to the extent available.</i>	SWMU Report RFI (Operable Unit) Work Plan VCA/VCM Report (if completed) RFI Report (if completed)	Level of detail and information quality is highest in VCA/VCM/RFI (if available); medium in RFI Work Plan; limited in SWMU report.
<i>(2) ... all available information pertaining to any release of hazardous wastes or hazardous constituents from such unit or units.</i>	SWMU Report RFI (Operable Unit) Work Plan VCA/VCM Report (if completed) RFI Report (if completed)	Level of detail and information quality is highest in VCA/VCM/RFI (if available); medium in RFI Work Plan; limited in SWMU report.
<i>(3) ... the results of sampling and analysis of groundwater, land surface, and subsurface strata, surface water, or air, which may include the installation of wells, where the Director ascertains it is necessary to complete a RCRA Facility Assessment that will determine if a more complete investigation is necessary.</i>	VCA Report (if completed) RFI Report (if completed)	In certain instances, limited preliminary or historical sampling data may be available in the RFI (Operable Unit) Work Plan

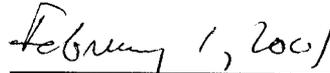
### CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



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Dennis J. Erickson  
Division Director for Environment, Safety, and  
Health Division  
Los Alamos National Laboratory  
Operator



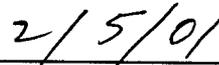
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Date Signed



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David A. Gurulé, P.E.  
Area Manager, Los Alamos Area Office  
U.S. Department of Energy  
Albuquerque Operations  
Owner/Operator



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Date Signed