

TA00

Land Transfer

Environmental Restoration Project



Los Alamos National Laboratory  
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Phone (505) 667-0808  
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From: <u>Paul Schumann</u>	Date: <u>1-25-01</u>
Phone: <u>667-5840</u>	Fax Number: <u>665-4747</u>

To: DARLENE GOERING FAX Number: 827-1544  
 Phone Number: \_\_\_\_\_ Organization: NMRO-OB

To: \_\_\_\_\_ FAX Number: \_\_\_\_\_  
 Phone Number: \_\_\_\_\_ Organization: \_\_\_\_\_

To: \_\_\_\_\_ FAX Number: \_\_\_\_\_  
 Phone Number: \_\_\_\_\_ Organization: \_\_\_\_\_

To: \_\_\_\_\_ FAX Number: \_\_\_\_\_  
 Phone Number: \_\_\_\_\_ Organization: \_\_\_\_\_

Number of Pages (excluding cover): \_\_\_\_\_

Comments: \_\_\_\_\_

Darlene,  
 Sorry I wasn't able to meet w/ you  
 & Terry today. Here is a little info on  
 the request for LA County to get land  
 for contractor laydown. Please call (I will  
 respond) & we can meet and/or discuss.

Thanks!  
Paul Schumann

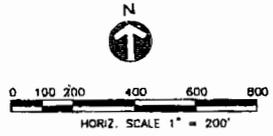
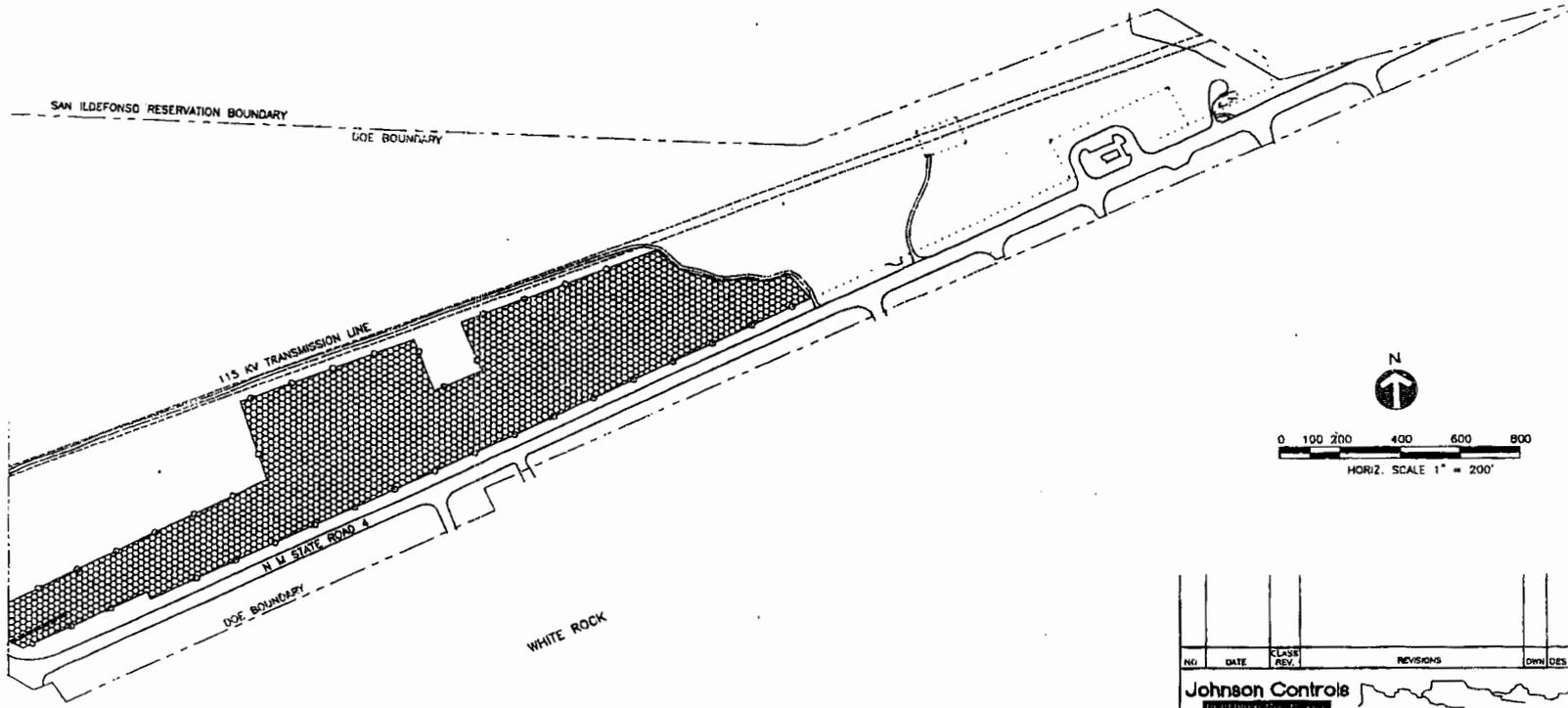
PAGER: 665-9800, PIN# 104-1029



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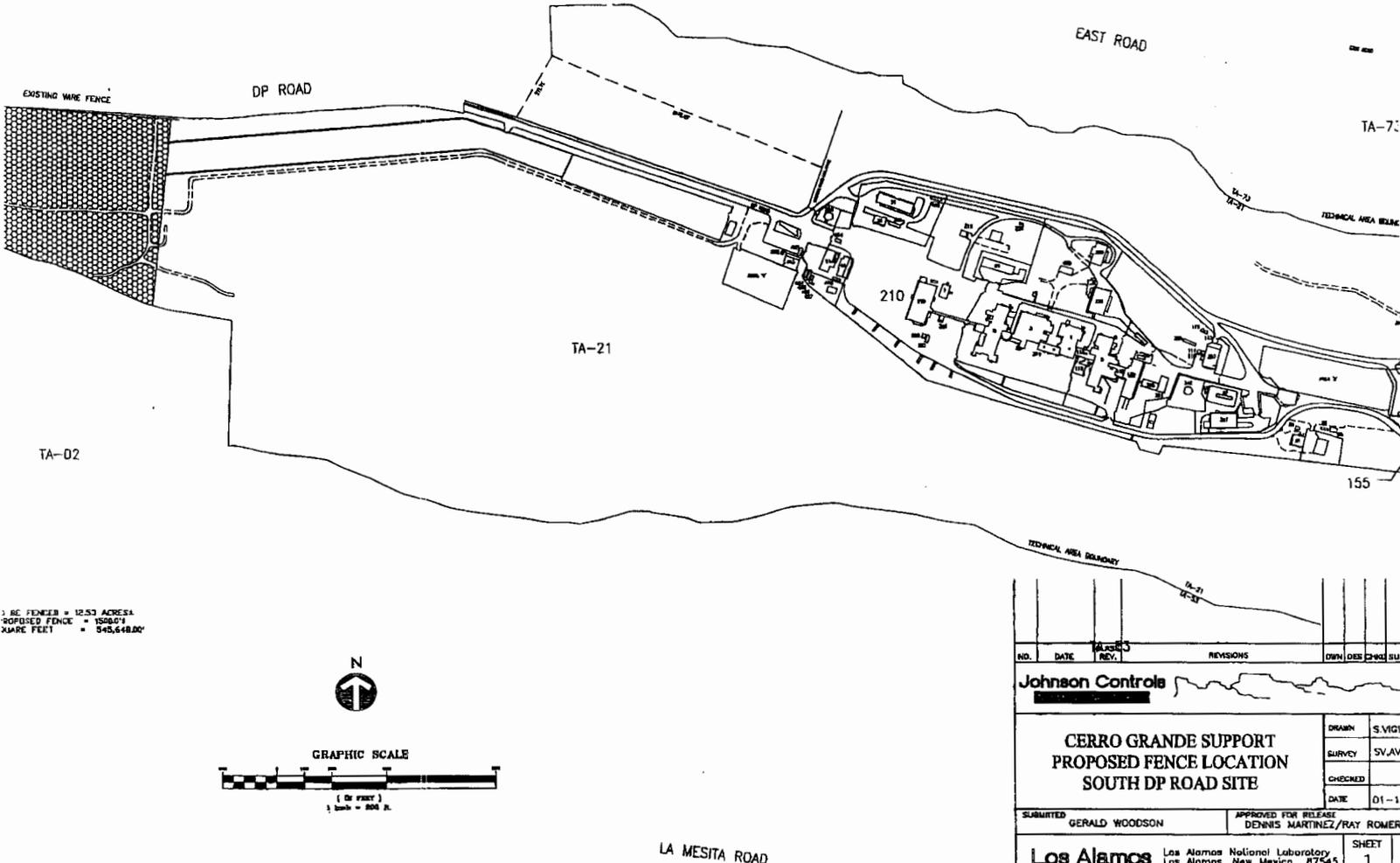
- POWER LINE
- 13 BUILDING/STRUCTURE
- ===== PAVED ROAD
- GRAVEL/DIRT ROAD
- SECURITY FENCE
- INDUSTRIAL FENCE
- GATES
- DOE/TECHNICAL AREA BOUNDARY

SAN ILDEFONSO RESERVATION SACRED LANDS

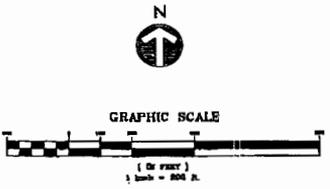



 TOTAL AREA TO BE FENCED = 20.07 ACRES  
 LINEAR FEET PROPOSED FENCE = 995.97'  
 TOTAL AREA SQUARE FEET = 874,372.00'

NO.	DATE	CLASS. REV.	REVISIONS	OWN.	DES.
<p><b>Johnson Controls</b></p> <p><b>CERRO GRANDE SUPPORT PROPOSED FENCE LOCATION WHITE ROCK SITE</b></p>					
SUBMITTED BY: GERALD WOODSON			APPROVED FOR RELEASE: DENNIS MARTINEZ/RAY		
<p><b>Los Alamos</b> Los Alamos National Laboratory Los Alamos, New Mexico 87545</p>					SHI 1
CLASSIFICATION		REVIEWER		DATE	
PROJECT #:			DRAWING NO.		



1 AC FENCE = 1053 ACRES  
 PROPOSED FENCE = 1500'±  
 SQUARE FEET = 545,448.00'



NO.	DATE	REVISIONS	OWN	DES	CHKD	DATE
<b>Johnson Controls</b>						
<b>CERRO GRANDE SUPPORT PROPOSED FENCE LOCATION SOUTH DP ROAD SITE</b>						DRAWN S.VIGIL
						SURVEY SV.AV.
						CHECKED
						DATE 01-12
SUBMITTED GERALD WOODSON			APPROVED FOR RELEASE DENNIS MARTINEZ/RAY ROMERO			
<b>Los Alamos</b> Los Alamos National Laboratory Los Alamos, New Mexico 87545						SHEET 1
CLASSIFICATION	REVIEWER	DATE				

LA MESITA ROAD

# Los Alamos

NATIONAL LABORATORY

## memorandum

Environmental Science and Waste Technology (E)  
Environmental Restoration  
E/ER

To/MS: Doris Garvey, ESH-EIS, MS M889  
Thru/MS: Dave McInroy, E/ER, MS M992  
From/MS: Julie A. Canepa, E/ER, MS M992  
Phone/FAX: 7-0808/5-4747  
Date: November 27, 2000  
Symbol: ER2000-0691

**SUBJECT: STATUS OF ENVIRONMENTAL RESTORATION (ER) PROJECT ACTIVITIES ON LAND PARCELS PROPOSED BY LOS ALAMOS COUNTY (LAC) FOR TEMPORARY ACCESS AS OF FEBRUARY 2001**

This memo responds to your November 14, 2000 request. You had asked that the ER Project provide you with a status report on ER Project work remaining to be completed on several land parcels for which LAC has requested to be granted temporary access (by special use permit or other mechanism) by February 2001. As identified on maps in your office on November 14, 2000, these parcels include:

- The eastern portion of the Airport parcel, north of State Road 502;
- The southern portion of the Airport parcel, south of State Road 502 (also known as contractor's row);
- The DP Road parcel on the south side of DP Road, excluding the archives building, the Johnson Controls (JCNNM) machine shop and the Sixth Street Warehouses;
- The mesa-top portion of the DP Road parcel on the north side of DP Road;
- The northwest corner of the TA-21 parcel; and
- The portion of the White Rock parcel that is adjacent to State Highway 4.

LAC proposes to use any available parcels as contractor laydown yards to support the residential rebuilding efforts in Los Alamos, and estimates that it will require access to such properties for at least two years. LAC further proposes that, since all of the requested parcels are portions of lands ultimately slated for conveyance under Public Law 105-119, the period of the special use permit should extend from February 2001 until the lands are formally conveyed, if possible.

The DOE has requested LANL's input in responding to the County's request. The information specifically requested of the ER Project was:

- A Potential Release Site (PRS)-by-PRS status report on whether remaining ER Project activities within each subparcel can be completed, including concurrence by the Administrative Authority on "no further action" recommendations, by February 2001;
- A description of where PRSs requiring ER Project action beyond February 2001 could be fenced off, effectively eliminating them from access by LAC; and
- Specific recommendations on use restrictions that would be imposed on the remaining areas, if necessary.

The attached table and supporting fact sheets summarize the information you requested. ER Project activities pose no barrier to the immediate conveyance of the eastern Airport subparcel and the White Rock subparcel. Minimal ER Project activities (and/or New Mexico Environment Department approval) will be required prior to the conveyance of the DP Road south subparcel, the DP Road north subparcel, and southern Airport subparcel. The eastern Airport subparcel contains no PRSs and, therefore, neither ER activity nor an ER portion of a CERCLA 120(h) report is required prior to conveyance of this subparcel to Los Alamos County. The White Rock subparcel was recently characterized by ER Project staff, and

Doris Garvey  
ER2000-0691

-2-

November 27, 2000

results show no contamination detected at levels exceeding background; these findings will be documented in the ER Project's CERCLA 120(h) report, which will be provided to you by next week.

The DP Road South subparcel contains the leachfield portion of septic system PRS 00-030(b); all components of PRS 00-030(b) were sampled during Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) activities. A RFI Report summarizing the activities and recommending the PRS for NFA (based on a human health evaluation) was submitted to NMED. NMED has not concurred with the NFA proposal. The existing data requires evaluation in accordance with the current human health and ecological risk process, and will likely need to be supplemented with additional data. As a result, the ER Project will be conducting confirmatory sampling at the leachfield portion of PRS 00-030(b). This field activity is currently scheduled in the April-May 2001 time frame, and will consist of collecting surface and near-surface samples from the leachfield area. LAC access could be provided for the subparcel as long as ER Project staff has access to the leachfield area for the spring 2001 sampling effort. The resulting data will be evaluated, along with previously collected data for the leachfield and other components of the PRS 00-030(b) septic system, to support the no further action (NFA) recommendation for the site.

The DP Road North subparcel contains the DP tank farm, which has been subject to extensive investigation in the past by the ER Project. Remaining investigative work is expected to consist only of monitoring contaminant seepage into DP Canyon. The NMED concurs with this investigative approach, and therefore the ER Project should not require access to the mesa-top portion of this subparcel, making it available for LAC use. Please note, however, that should the soil be disturbed, some potential exists for encountering portions of abandoned fuel lines or stray patches of diesel-contaminated soil that may have been inadvertently left behind during previous excavation efforts. Therefore, with this and other subparcels, the ER Project requests that a clause be written in the special use permit requiring that ER Project staff be present on-site during any grading or excavation activities that LAC may undertake, so that any such material can be identified and managed appropriately.

The Airport South subparcel contains eight PRSs that have been consolidated into one unit, 73-005-99, as part of previous annual unit audit (AUA) efforts. As consolidated PRS 73-005-99, all eight individual PRSs have been characterized (including some limited remediation) in accordance with current applicable regulations. The resulting data indicate that any residual contaminants of concern pose an acceptable level of risk for unrestricted future use of this site. The investigation, data, and evaluation supporting this result are summarized in the "RFI Report for Consolidated PRS 73-005-99," which was submitted to NMED in July 2000. NMED approval of this report and NFA proposal is pending.

At the TA-21 West subparcel, ongoing ER Project activities are extensive enough to preclude its conveyance transfer by February 2001. Subsurface investigation is still required within the subparcel, where the ER Project still must complete characterization and remediation of two of the PRSs (PRSs 21-024(f) and C-21-015). This work is currently slated to be completed in FY04, although it could be accelerated so that the parcel is ready for transfer by February 2002. These two PRSs are located at the eastern end of the subparcel and can be fenced to restrict access until remediation is complete, while making the remainder of the subparcel, which includes PRSs 21-013(d and e), available for LAC use.

Voluntary corrective action (VCA) activities were completed at PRSs 21-013(d and e), which are also located within the TA-21 West subparcel. These two PRSs were consolidated into

Doris Garvey  
ER2000-0691

-2-

November 27, 2000

one unit, 21-013(d)-99, as part of previous AUA efforts. A VCA completion report summarizing the activities and recommending the PRSs for NFA (based on a human health evaluation) was submitted to NMED. While the data requires evaluation in accordance with the current human health and ecological risk process, the ER Project believes that no further data collection via sampling is necessary to complete that process. Therefore, access could be provided in the interim while awaiting NMED approval of the revised NFA recommendation.

The ER Project strongly recommends that the following restriction be incorporated into any special use permit or other land use agreement that DOE enters into with Los Alamos County: that the storage of any liquids (as defined by RCRA) containing one or more hazardous constituents be prohibited in all of the subparcels. It is neither in the best interest of LANL nor DOE to allow any activities onsite that could result in the recontamination of areas formerly containing PRSs. If storage of liquids must take place at one of these sites, the ER Project recommends the use of the eastern Airport subparcel or the White Rock. Further, we would caution that any temporary use agreements would be discussed with NMED well in advance of February 2001, to ensure that they concur with DOE's proposed approach in all areas where NFA approvals may still be pending.

If you have any additional questions or wish to discuss this matter in more detail, please call Paul Schumann at (505) 667-5840.

JC/VS/vn

Attachment: ER Project Status in Subparcels Proposed for Transfer by  
February 2001

Cy (w. attach.):

M. Buksa, E/ET, MS M992  
J. Canepa, ER, MS M992  
J. Hopkins, EES-13, MS M992  
W. Neff, E/ET, MS M992  
J. Pope, Adelante, MS M992  
A. Pratt, EES-13, MS M992  
P. Schumann, E/ER, MS M992  
V. Smith, Adelante, MS M992  
T. Taylor, LAAO, MS A316  
T. Trujillo, DOE/AL, MS A906  
E/ER C&O Reading File, MS M992  
E/ER File, MS M992  
RPF, MS M707

**Subparcel of TA-21 West  
Potential Release Sites (PRSs) - 21-024(f) and C-21-015**

**Location:** TA-21 Site

**Description and History:** PRS 21-024(f) is an abandoned septic system and outfall that received sewage from building TA-21-45, through septic tank TA-21-124. The liquid then discharged into a shallow outlet pit approximately 3 ft x 3 ft x 2 ft on the south edge of DP Mesa. PRS C-15-021, described as former building TA-21-45, housed safety-training operations in the mid-1940s. Archival research conducted following the completion of the TA-21 Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Work Plan indicated that the Laboratory's Industrial Waste Studies Group converted the building for use as a laboratory in 1949 where methods to recover radionuclides and metals from waste streams generated at TA-21 were studied. Only a concrete sump and drain line remain where the building was located. The sump and drain line were installed as part of the building conversion in 1949.

PRS 21-024(f) was sampled in 1988, 1992, and 1993. Contaminants of potential concern (COPCs) include cesium-137, tritium, plutonium-239, americium-241, strontium-90, mercury, and cadmium all detected above background levels but below screening action levels (SALs) in the outfall drainage channel. Investigations in 1992 and 1993 (boreholes at the septic tank and outlet pit) showed concentrations of radionuclides and inorganic analytes below upper tolerance limits (UTLs). No organic analytes were detected. PRS C-21-015 has not been the subject of an RFI investigation to date. Based on RFI results for PRS 21-024(f) and the archival information describing the change in use of Building TA-21-45, a Voluntary Corrective Action (VCA) plan proposing the removal of both PRSs was prepared and submitted to the New Mexico Environment Department (NMED) in July 1999. Waste characterization samples were collected from the septic tank (PRS 21-024(f)) and sump (PRS C-15-021) in June 1999. Results indicate that the sump contents will be managed as low level waste (LLW), while the septic tank contents may be considered mixed-LLW. The VCA was halted temporarily by the Environmental Restoration (ER) Project in September 1999 due to a reprioritization of work.

**Current Regulatory Status:** PRS 21-024(f) is on the Hazardous and Solid Waste Amendments (HSWA) Module and was proposed for no further action (NFA) solely on the basis of human health risk. NMED did not concur with the recommendation for NFA. PRS C-21-015 is not on the HSWA Module and was proposed for NFA in the RFI work plan prior to the discovery of information related to the change in the use of the building in 1949. DOE did concur with the NFA, but was unaware of the 1949 change in building operations. In June 1999, NMED agreed that the continued investigation and remediation of these PRSs may be undertaken as a VCA.

**Proposed Remedy:** Completion of VCA by removal of structures and residual contamination, if any, followed by confirmation sampling and data evaluation.

**Actions Required for LAC Access:** No LAC access (to this portion of the subparcel only) by 2/01. Reprioritize work, ensure path forward for waste, restart contractors, and implement VCA including confirmation sampling and data evaluation. Conduct additional characterization sampling, remove structures/equipment and residual contamination (if any), and conduct confirmatory sampling to support a recommendation of integrated NFA. Work is not currently scheduled for completion until FY03-05.

**Recommendations/Limitations for LAC Access:** The location of PRSs 21-024(f) and C-21-015 (the easternmost end of the subparcel) should be fenced to prevent LAC access and allow for ER Project completion of the VCA without impeding LAC access to the remainder of this subparcel.

**Actions Required Prior to Final Transfer:** Reprioritize work, ensure path forward for waste, restart contractors, and implement VCA including confirmation sampling and data evaluation. Conduct additional characterization sampling, remove structures/equipment and residual contamination (if any), and conduct confirmatory sampling to support a recommendation of integrated NFA.

**Subparcel of DP North  
Potential Release Site (PRS) - 21-029**

**Location:** DP Road Site

**Description and History:** PRS 21-029, DP Tank Farm, is the former location of 15 fuel storage tanks and two fill stations located on the north side and at the west end of DP Road. All tanks and structures were decommissioned and removed in 1988. The tanks stored only petroleum hydrocarbon products (primarily diesel fuels, and small quantities of gasoline and kerosene). Of the 15 tanks, only one was found to have leaked. As a result, approximately 4 cubic yards of soil contaminated with diesel fuel were removed during the 1988 decommissioning of the site. Initial results from the 1994 Phase I Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) indicated that a release at one of the fill stations had not been fully addressed in 1988. The total petroleum hydrocarbons (TPH) levels did not exceed New Mexico Underground Storage Tank (UST) clean-up levels; however, a cleanup was performed as a best management practice. In addition, a small area of TPH contamination was identified in the adjacent canyon bottom. The contamination in the canyon bottom has been identified as weathered diesel fuel and analytical fingerprint results confirm DP Tank Farm as the source. In June 1998, the New Mexico Environment Department (NMED) issued a compliance order requiring preparation of a Phase II RFI work plan to further investigate the site; this work plan was drafted and submitted in October 1998. The work plan was substantially rewritten and submitted to NMED as part of a negotiated response to a Request for Supplemental Information (RSI) in December 1999. The revised work plan was implemented during Spring and Summer 2000 and preliminary analytical results indicate only low levels of residual hydrocarbon contamination (< 35 parts per million (ppm) TPH) remaining primarily at depth (40' below ground surface (bgs)) in fractures at a few locations in the northwest portion of the site.

**Current Regulatory Status:** This PRS is on the Hazardous and Solid Waste Amendments (HSWA) Module and the RFI of the site is basically complete. The Environmental Restoration (ER) Project is awaiting final analytical data from the Phase II RFI.

**Proposed Remedy:** No further action (NFA) will be recommended in the RFI report to be prepared and submitted to NMED in FY01.

**Actions Required for LAC Access:** Receipt and review of outstanding analytical data from subsurface sample locations on the mesa top. In order to accelerate the temporary use of the DP Tank Farm parcel by Los Alamos County, NMED staff have indicated that they may issue a letter stating that there is no further environmental concern associated with the parcel, if the outstanding analytical results are consistent with those already received.

Access to DP Canyon is required for routine monitoring and periodic sampling by the Canyons Focus Area to monitor the hydrocarbon seep(s) in the canyon bottom originating from historic releases at the former DP Tank Farm. To date, surface water and sediment samples collected from the stream channel in the canyon bottom show no detectable hydrocarbon contamination in surface water and low levels of contamination throughout the stream channel attributed to runoff from the Los Alamos town site.

**Recommendations/Limitations for LAC Access:** The DP Tank Farm parcel (PRS 21-029) is recommended for temporary use as a material laydown area and for future land transfer. The site is fenced with easy access from DP Road and would require only minimal leveling of surface soils for use as a materials lay down area. Limitations should include the following: 1) no storage of chemicals, tars, petroleum products or equipment containing any of these materials; 2) unrestricted LANL/DOE access to the DP Canyon stream channel for routine monitoring and

periodic sampling events; and 3) LANL ER Project oversight of site leveling activities to address the potential of uncovering hydrocarbon-contaminated soils and/or any remaining piping from the former petroleum storage tanks.

**Actions Required Prior to Final Transfer:** Evaluate data from FY00 RFI and submit report proposing NFA for the site. This will require demonstrating that the site does not impact human health, the environment, and ground water or surface water quality. Field screening (by immunoassay test kits) and preliminary analytical results indicate that residual hydrocarbon contamination is at low levels and primarily at depth in a few locations in the northwest portion of the site. Excavated soils with residual hydrocarbon contamination would be removed from the site immediately upon discovery. County work would be stopped until removal or final disposition of the residual material was completed.

**Subparcel of TA-21 West  
Potential Release Sites (PRSs) – 21-013(d & e)**

**Location:** TA-21 Site

**Description and History:** PRSs 21-013 (d and e) are former surface disposal areas.

**Note:** PRS 21-013(c) is located at the eastern end of DP mesa near Material Disposal Area (MDA) U and is therefore not included in the land parcels proposed by Los Alamos County for temporary use by February 2001.

PRS 21-013(d) is believed to have been a disposal site for nonradioactive waste chemicals or materials and was referred to as the "cold dump." PRS 21-013(e) is the former disposal site for building debris, such as excess concrete, demolished foundations, etc. and is located northwest of PRS 21-013(d). Each of the PRSs was investigated during a 1994 Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI). In 1995, corrective action activities were conducted at each of the sites. Because the locations of the former disposal sites were indefinite, the area of investigation used during the 1995 Voluntary Corrective Action (VCA) was greatly enlarged and the sites are now contiguous areas. As a result, the PRSs were consolidated during the FY99 Annual Unit Audit (AUA) into PRS 21-013(d)-99.

**Current Regulatory Status:** This consolidated PRS is on the Hazardous and Solid Waste Amendments (HSWA) Module and was proposed for no further action (NFA) solely on the basis on human health risk in the 1995 VCA Report. LANL responded to the subsequent New Mexico Environment Department (NMED) Request for Supplemental Information (RSI) on the VCA report in July 1998. The NMED has not yet concurred with the recommendation for NFA.

**Proposed Remedy:** No additional remedial action is anticipated to be necessary.

**Actions Required for LAC Access:** Subparcel can be used for contractor laydown yard; however the Environmental Restoration (ER) Project must continue to have access to the area comprising these PRSs (the entire site) for potential additional screening/sampling.

**Recommendations/Limitations for LAC Access:** The western portion of the TA-21 West parcel (PRSs 21-013(d & e) is recommended for temporary use as a material lay down area and for future land transfer. The site is easily accessed from DP Road and would require leveling of surface soils and possible removal of trees and shrubs for use as a material lay down area. Limitations should include the following: 1) no storage of chemicals, tars, petroleum products or equipment containing any of these materials; 2) installation of a fence along the eastern boundary to separate this parcel from the parcel consisting of PRSs 21-024(f) and C-21-015; and 3) LANL ER Project oversight of site leveling activities to address the potential of uncovering of any remaining debris from the former disposal areas.

**Actions Required Prior to Final Transfer:** Confirmatory sampling analytical data from the VCA should be evaluated against current human health and ecological risk screening values. A supplemental radiation survey and possible collection of a few confirmatory samples (as necessary) may be required to support the recommendation of NFA.

**DP Road South Subparcel  
Potential Release Site (PRS) - 00-030(b)**

**Location:** DP Road Site

**Description and History:** The DP Road South Subparcel is the portion of the DP Road Parcel located on the south side of DP Road, excluding the archives building, the JCNNM machine shop, and the Sixth Street Warehouses area. Only the leachfield portion of PRS 00-030(b) lies within the DP Road South Subparcel.

PRS 00-030(b), also known as Septic System #1, is located east of the Sixth Street warehouses. The septic system is composed of four tanks, associated drainlines, and leachfield that served Sixth Street Warehouses 1 through 4, an office building, a cold storage plant, and the eastern portion of TA-1. The septic tanks discharged to a leach field located east of the Sixth Street warehouses and ultimately to an outfall to Los Alamos Canyon.

As part of 1995 Resource Conservation and Recovery Act (RCRA) facility investigation (RFI) activities, exploratory trenches were excavated to locate the central drainline and lateral branches of the leachfield. However, the majority of the leach filed lateral lines and the central drainline were not present. Samples were collected from and beneath the lateral branches of the leachfield. It is believed that terracing and re-contouring of the area prior to construction of a trailer park in the 1950s resulted in removal of the majority of the leachfield. This belief is supported by the numerous VCP fragments found across the field and current surveyed ground surface and manhole elevations that are up to six feet below those shown in a 1943 engineering drawing of the septic system.

**Current Regulatory Status:** This PRS is on the Hazardous and Solid Waste Amendments Module (HSWA) and was proposed for no further action (NFA) on the basis of human health risk alone. The New Mexico Environment Department (NMED) has not concurred with this recommendation.

**Proposed Remedy:** The subparcel can be used for contractor laydown yards as existing data indicates that there is acceptable human health risk based on a residential risk scenario. ER will need to retain access to the leachfield area to collect additional samples.

**Actions Required for LAC Access by 2/01:** None.

**Recommendations/Limitations for LAC Access:** Storage of liquids (as defined by RCRA) containing one or more hazardous constituents is prohibited. Also, ER staff should be present during any LAC grading/excavation activities and needs to retain access to the leachfield area any necessary future sampling.

**Actions Required Prior to Final Transfer:** The existing data for the septic tanks, associated drainlines, and the leachfield requires evaluation in accordance with the current human health and ecological risk process, and will likely need to be supplemented with additional data. The resulting data will be evaluated, along with previously collected data, to support the integrated no further action (NFA) recommendation for the PRS.

**Airport-Southern Subparcel  
Potential Release Sites (PRSs) - 73-005, 73-007, and C-73-005(a-f)**

**Location: Airport Site**

**Description and History:** The Airport-Southern Subparcel is located south of the Los Alamos Airport between State Road NM 502 and the north rim of DP Canyon. Eight PRSs (73-005, 73-007, and C-73-005(a-f)) are located within this subparcel in an area formerly known as Contractors' Row, which extended from near the west end of the airport runway to the east for approximately 2800 ft. The eight PRSs have been consolidated as PRS 73-005-99, as part of a previous annual unit audit (AUA) effort, because they are within the same general area and served the facilities at, or were the result of activities within, Contractors' Row.

PRS 73-005 is a surface disposal area that is roughly 400 ft long and 200 ft wide, extending from near the NM 502 right-of-way fence line to near the north rim of DP Canyon. The area contains scattered concentrations of concrete, asphalt, road aggregate, and metal debris. Samples were collected and two small areas were cleaned up during field activities.

PRS 73-007 is located within the boundary of PRS 73-005 and consists of a steel septic tank, riser pipes, and associated drainlines. It is assumed that this septic system served a facility formerly located in Contractor's Row. However, there is no historical information to document the identify or purpose of the facility, or the constituents of the waste discharged to this septic system. The tank and drainlines were removed and samples were collected during field activities.

PRSs C-73-005(a-f) are six unlined pits of various dimensions ranging from 3 to 6 ft x 5 to 12 ft x 2.5 to 6 ft that were excavated into tuff. It is believed, based on their physical appearance, that they received sanitary waste from facilities within the Contractors' Row area during the period of operation, from approximately 1947 to 1951. However, there are no records of pit construction or operation and no engineering drawings or other historical information that illustrate the location of a former facility or septic pit within this area. The drainlines associated with PRSs C-73-005(a and b) were removed and samples associated with PRSs C-73-005(a-f) were collected during field activities.

**Current Regulatory Status:** PRS 73-005 is listed in the Hazardous and Solid Waste Amendments (HSWA) Module and PRSs 73-007 and C-73-005(a-f) are not listed in the HSWA Module. Consolidated PRS 73-005-99, consisting of all eight individual PRSs, has been characterized, and some areas remediated, in accordance with current applicable regulations. As a result, it has been proposed for no further action (NFA). NFA approval from NMED is pending.

**Proposed Remedy:** None. Characterization, and remediation in some areas, is complete.

**Actions Required for LAC Access by 2/01:** None.

**Recommendations/Limitations for LAC Access:** Storage of liquids (as defined by RCRA) containing one or more hazardous constituents is prohibited and ER Project staff should be present during any LAC grading/excavation activities.

**Actions Required Prior to Final Transfer:** None.

ER PROJECT STATUS IN SUBPARCELS PROPOSED FOR LAC ACCESS BY FEBRUARY 2001

Parcel	PRs	Field Work Status	NFA Concurrence Authority	NFA Status	ER-Related Barrier to LAC Access by 2/2001?	Proposed Actions to Enable LAC Access by 2/01	Further Action Required Prior to Final Transfer	Comments
Airport - Eastern subparcel	none	No ER field work is required in this subparcel.	Not applicable	Not applicable	No. There is no ER-related barrier to LAC access.	None required.	No	<ul style="list-style-type: none"> <li>None.</li> </ul>
Airport - Southern subparcel	73-005 73-007 C-73-005(a) C-73-005(b) C-73-005(c) C-73-005(d) C-73-005(e) C-73-005(f)	All ER characterization and cleanup work associated with consolidated unit 73-005-99, which includes all of these PRSs, is believed to be complete.	NMED NMED/DOE	Proposed to NMED in July for consolidated unit 73-005-99, which includes all of these PRSs. NMED approval is pending.	No. There is no ER-related barrier to LAC access. NFA approval for PRSs on this subparcel is pending.	None required.	No	<ul style="list-style-type: none"> <li>Recommend adding a rest special use permit that pre use or storage of any RCR that contain one or more h constituents.</li> <li>ER staff should be present grading/excavation activit</li> </ul>
DP South	00-030(b)	Confirmatory sampling to support existing NFA recommendation currently scheduled for April-May 2001.	NMED	Proposed to NMED in 1996; however, NMED did not concur with the NFA proposal.	No. Subparcel can be used for contractor laydown yards; however ER must retain access to the area comprising this PRS for potential additional sampling.	None required.	Yes. Re-evaluate existing data according to current standards, complete additional sampling (if necessary), and submit amended report proposing NFA for the site. The subparcel can be accessed by LAC prior to DOE and NMED approval of NFA proposal.	<ul style="list-style-type: none"> <li>Recommend adding a rest special use permit that pre use or storage of any RCR that contain one or more h constituents.</li> <li>ER staff should be present grading/excavation activit</li> <li>ER staff must retain acces sampling, if needed.</li> </ul>
DP North	00-027	Although long-term remediation will be required at this PRS, it will not impact the DP Road North subparcel.	NMED	Long-term remedial action is required prior to NFA.	No. This PRS is in the 50-foot buffer area around the DP Road parcel. It does not affect the parcel, itself.	None required.		<ul style="list-style-type: none"> <li>Recommend adding a rest special use permit that pre use or storage of any RCR that contain one or more l constituents.</li> </ul>
	21-029	Additional monitoring of contaminant seepage will be required in DP Canyon, but no additional investigation is anticipated to be required on the mesa top.	NMED	Will be proposed for NFA in RFI report to be submitted to NMED in FY01.	No. Continuing investigations are occurring in DP Caayon, but not on the mesa-top.	None required.	Yes. Evaluate data from FY00 RFI and submit report proposing NFA for the site. The subparcel can be accessed by LAC prior to DOE and NMED approval of NFA proposal.	<ul style="list-style-type: none"> <li>ER staff should be present grading/excavation activi</li> <li>Some provision for coniti access to the canyon area (but not mandatory).</li> </ul>

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LANL ER PROJECT

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Parcel	PRs	Field Work Status	NFA Concurrence Authority	NFA Status	ER-Related Barrier to LAC Access by 2/01?	Proposed Actions to Enable LAC Access by 2/01	Further Action Required Prior to Final Transfer	Comments
White Rock	Canada del Buey reach <sup>1</sup>	All ER characterization work believed to be complete. No VCA work required.	DOE	DOE concurrence is required.	No. Parcel can be transferred by 2/01.	None required.		<ul style="list-style-type: none"> <li>None.</li> </ul>
TA-21 West	21-013(d) & 21-013(e) <sup>1</sup>	All ER characterization and VCA work associated with consolidated unit 21-013(d)-99, which includes these 2 PRs, is believed to be complete	NMED	Proposed to NMED in 1996; however, NMED did not concur with the NFA proposal.	No. Subparcel can be used for contractor laydown yards; however ER must have access to the area comprising these PRs (the entire site) for potential additional screening/sampling.	None required (see comments).	Yes. Re-evaluate existing data according to current standards, complete additional sampling (if necessary), and submit amended report proposing NFA for the site. The subparcel can be accessed by LAC prior to DOE and NMED approval of NFA proposal. Work is not currently scheduled to complete data evaluation and potential screening/sampling.	<ul style="list-style-type: none"> <li>Recommend adding a restrict special use permit that prohibit use or storage of any RCRA- that contain one or more haza constituents.</li> <li>ER staff should be present du grading/excavation activities</li> <li>ER may want to perform a ra verification purposes prior to access.</li> <li>ER staff must retain access fo sampling, if necessary.</li> </ul>
TA-21 West	21-024(f) & C-21-015	Waste characterization samples collected as part of VCA; however, remaining VCA activities (removal of all remaining components of septic system and sump) were not completed due to re-prioritization of work.	DOENMED	NFA concurrence received from DOE for AOC C-21-015 for human health, but not for integrated NFA.	Yes. VCA plan involving remediation of both PRs should be implemented prior to LAC access or transfer. Work is currently scheduled for completion in FY03-05. Contract vehicle is in place to complete this work; however, no funding has been allocated.	No LAC access (to this part of the subparcel only) by 2/01. Reprioritize work, ensure path forward for waste, restart contractors, and implement VCA including confirmation sampling and data evaluation. <sup>3</sup>	Yes. VCA of PRs should be completed including remediation, confirmation sampling, data evaluation and report preparation and submittal. The subparcel can be accessed by LAC prior to DOE and NMED approval of NFA proposal. Work is currently scheduled for completion in FY03-05.	<ul style="list-style-type: none"> <li>The location of PRs 21-024-015 (the eastern end of the su be fenced to prevent LAC acc for ER Project completion of</li> <li>ER staff should be present du grading/excavation activities</li> </ul>

Global restriction on liquids storage should be imposed, along with a clause requiring LAC to report any spills to DOE and clean them up immediately.

This presence would include the authority to stop LAC work until LANL /DOE could remove any material found.

On the date of this table, the LANL canyons systems are still considered to be Areas of Concern to the NMED, and are not listed as PRs on the HSWA Module of LANL's Hazardous Waste Facility Permit.

L understands that NMED is contemplating adding add LANL canyons systems to the permit as PRs.

PRs 21-013(c) is located at the eastern end of DP Mesa and should not be included in the land parcels proposed by LAC for access by February 2001.

This re-prioritization would require prior DOE approval. This work is not included in the current version of the FY01 ER Project baseline.