

# MEMO

To: Janice Archuleta, Environmental Specialist  
Thru: *MS* Robert S. (Stu) Dinwiddie, RPMP Manager  
From: *JK* John Kieling, RPMPs LANL Facility  
Subject: **Comments on the Potential Release Sites (PRSs) Regarding the "Predecisional Draft Environmental Assessment for Lease of Land for the Development of a Research Park at LANL."**  
Date: August 22, 1997

I have looked into the status of each of the PRSs in question regarding the land to be developed for the Research Park at LANL. The PRS which are not on the HSWA module of the LANL RCRA permit should also be considered by NMED for No Further Action (NFA) status. The PRSs not on the HSWA module may or may not be adequately addressed for NFA status. If any of these PRSs were not appropriately considered as a SWMU there is a reasonable chance that NMED may add these sites to the HSWA module.

If LANL is seriously considering to lease this area for development they should follow-up with the PRSs, not addressed, within a "No Further Action Proposal" through a class 3 permit modification. Any further land transactions, leases, etc. that LANL is anticipating the PRSs within these areas should be covered prior to the consideration of such proposals.

Following are comments regarding the status of each of the PRSs

PRS: Description: Comments:

### PRSs located within the boundaries of the proposed Research Park:

3-009(b) Surface Disposal	SWMU on HSWA module Table A. Proposed for NFA March 1995. Appears appropriate for removal from HSWA module. Class 3 Permit Modification has not been initiated by HRMB.
3-038(a) Acid Tank and associated Waste Lines	SWMU on HSWA module Table A. This SWMU has not been proposed for an NFA through a Class 3 Permit Modification.
3-038(b) Waste Retention Tank and associated Waste Lines	SWMU on HSWA module Table A. This SWMU has not been proposed for an NFA through a Class 3 Permit Modification.
3-055(c) Outfall	SWMU on HSWA module Table C - OU 1114. This SWMU was proposed for NFA within the OU 1114 WP. This SWMU has not been proposed for an NFA through a Class 3 Permit Modification. This site is also a potential surface water concern.
30-001 Landfill/Surface Disposal	SWMU not on HSWA module. SWMU proposed for NFA on March 1995 through a Class 3 Permit Modification. This SWMU has not been addressed by HRMB as an NFA (only HSWA SWMUs were considered at the time of review, the non-HSWA have not been formally reviewed by HRMB).



Memo - Janice Archuleta  
August 22, 1997  
Page 2 of 2

**PRs that are outside of, but close to, the boundaries of the land proposed for lease.**

3-001(m) Satellite Storage

SWMU not on HSWA module. Proposed for NFA in OU 1114 WP. Considered as an AOC by LANL and proposed for NFA, September 1995, under NFA criterion 3 (The PRS is regulated under a different authority which addresses corrective action). Class 3 Permit Modification has not been initiated by HRMB.

3-055(d) Outfall

SWMU on HSWA module Table C - OU 1114. Proposed for NFA, September 1996. Appears appropriate for removal from HSWA module. Class 3 Permit Modification will be initiated soon. This site is also a potential surface water concern.

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