



This RCRA Facility Investigation (RFI) Report includes Potential Release Site (PRS) 09-002, an inactive burn site, and PRS 09-011(b), a former temporary equipment storage area.

### **Recommendations**

Phase I investigations were performed at both sites according to the approved RFI Work Plan for Operable Unit 1157. Because no hazardous constituents were found above background or detection limits at PRS 09-011(b), NMED recommends No Further Action (NFA) at PRS 09-011(b). This recommendation is consistent with NFA Criterion 3, which states, "No release to the environment has occurred or is likely to occur in the future from the SWMU/AOC."

NMED requests that LANL submit additional information which will confirm that samples have been taken from the exact location of PRS 09-002, as described by the property appraisal form referenced in §2.2.2 of the RFI Report. Please see the comments which follow.

| PRS       | LANL'S PROPOSED ACTION | DOES AA CONCUR? | AA RATIONALE                |
|-----------|------------------------|-----------------|-----------------------------|
| 09-002    | NFA                    | No              | See PRS-specific comments   |
| 09-011(b) | NFA                    | Yes             | See Recommendation comments |

### **Comments**

At the time of Administrative Authority (AA) approval, the RFI Work Plan for operable Unit 1157 made no mention of the property appraisal form referenced in §2.2.2 or to the uncertainties associated with the exact location of PRS 09-002. For this reason, an investigation methodology was approved for a location which NMED now has reason to question.

Although "...the site investigated as the burn pit was independently located by two other retired LANL employees who worked at TA-9 (page 8)," the property appraisal form describes a burn pit which was "approximately 10ft. wide by 40 ft. long and 3ft. in depth...(page 8)." The size of the current pit, 10 ft by 13 ft, is considerably smaller than the pit described in the property appraisal form. Furthermore, no trace amounts of ash or burned materials were found at the sampled location. NMED requests that LANL submit any information regarding ash disposal or backfilling which was conducted at the burn pit in question.

LANL has provided employee interviews and memorandums regarding PRS 09-002. However, NMED requests that LANL submit the property appraisal form and any information available which would confirm that the sampled site is the only former burn pit area in TA-9. Historical photographs may also be of assistance. It is possible that the burn pit described in the property appraisal has actually been backfilled to grade.