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RC/HZ/TE
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Rec'd
 JUL 19 2001



Date: July 3, 2001
 Refer to: ER2001-0528

Doris Garvey
 Los Alamos National Laboratory
 ESH-MS M389
 Los Alamos, NM 87545

1063
 TA-46

**SUBJECT: ER COMPREHENSIVE ENVIRONMENTAL RESPONSE
 COMPENSATION AND LIABILITY ACT (CERCLA) 120(h)
 INFORMATION FOR POTENTIAL RELEASE SITES (PRS) SITUATED
 WITHIN THE BOUNDARIES OF THE PROPOSED ICON FACILITY
 LEASE AT TA-46-88**

Dear Ms. Garvey:

The purpose of this document is to transmit information pertaining to the CERCLA 120(h) report for the property surrounding Los Alamos National Laboratory (LANL), Building TA-46-88, ICON facility formerly used to generate stable isotopes of carbon, oxygen and nitrogen. The Department of Energy (DOE) is considering leasing this facility to a private enterprise. The Laboratory has been requested to provide requisite information in support of a CERCLA 120(h) notice to accompany the proposed lease of the facility. The CERCLA notice requires the identification of hazardous substances, as defined in 40CFR302.4, which have been stored for more than one year in quantities that are greater than either 1000 kg or the Reportable Quantity (RQ), whichever is greater, or which have been released or disposed of on the property in quantities greater than the RQ for release or disposal.

Attached are the summaries of the information required for a CERCLA 120(h) for two potential release sites (PRSs) at TA-46-88. The primary source of information presented in these two summaries is the RFI Workplan for Operable Unit 1140, LANL, 1993. In addition, the LANL Environmental Restoration (ER) Project provided information on the current regulatory status of the two PRSs. Please be advised that neither of the two PRSs in question have undergone field-oriented RCRA Facilities Investigations (RFI); the attached summaries are based only on available information on the historical storage and disposal of hazardous substances at these PRSs. The Facility for Information Management and Display (FIMAD) provided information on the location of the PRS. These locations were superimposed on a survey map prepared by Salvador I. Vigil, a registered professional surveyor, from JCNNM.



Ms. Doris Garvey
ER2001-0528

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July 3, 2001

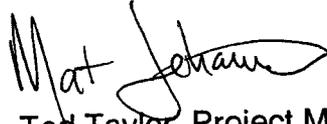
If you have any questions, please call Virginia Smith at (505) 667-2805 or (505) 920-4150. Ms. Smith is addressing ER-related land transfer issues during the absence of Paul Schumann, our Deputy Focus Area Leader for Regulatory Compliance.

Sincerely,



Julie A. Canepa, Program Manager
Environmental Restoration Project
Los Alamos National Laboratory

Sincerely,



Ted Taylor, Project Manager
Department of Energy
Los Alamos Area Office

JC/TT/VS/vn

Enclosure: 1) PRS Information Sheets
2) Map of PRSs within the Boundaries of the Property Proposed for Lease

Cy (w/enc.):

D. Hickmott, EES-6, MS M992
M. Kirsch, E/ER, MS M992
G. Lopez-Escobedo, E/ET, MS M992
D. Neleigh, US EPA (2 copies)
P. Schumann, E/ER, MS M992
V. Smith, E/ER, MS M992
G. Turner, LAAO, MS A316
E/ER File, MS M992
RPF, MS M707

Cy (w/o enc.):

J. Canepa, E/ER, MS M992
D. McInroy, E/ER, MS M992

Potential Release Site (PRS): 46-001

Location: Technical Area 46
Description: Inactive storage area

History: PRS 46-001 is the site of a decommissioned acid waste tank, which in 1993 was listed on the Laboratory's EM-8 database as an inactive, less-than-90 day waste accumulation area. One of two unbermed tanks released hazardous waste (at least 5 gallons of 6-7 Molar nitric acid) in 1987. The tanks were subsequently bermed, emptied and cleaned, and by 1990 no longer contained any hazardous waste. The activities in the adjacent building (TA-46-88) at that time involved the production of non-radioactive isotopes of carbon, oxygen, and nitrogen (ICON). When the program ended in 1989, much care was devoted to cleanup and neutralization. Researchers indicated that the ICON process involved the reaction of sulfur dioxide and nitric acid to produce only sulfuric acid and oxides of nitrogen. Nitric and sulfuric acids were the only wastes produced; no regulated hazardous wastes were generated by these activities. Although concentrated acids are corrosive, they pose no hazards after dilution and neutralization in the environment (RFI Work Plan for OU 1140, August 1993).

Is there any record of a hazardous substance having been on site?

Yes. The acid waste tanks were used as accumulation areas for waste nitric and sulfuric acids.

Was the amount stored greater than or equal to 1,000 kg or the RQ, whichever is greater?

Yes. There were a total of six tanks used at the PRS to store acid. Four 220 gallon tanks for storage of waste sulfuric acid and two tanks, one 5,000 gallon and one 1,000 gallon, used to store nitric acid (Grieggs, June 20, 2001). The combined capacity of the six tanks is 6,880 gallons. The RQs for nitric and sulfuric acid are both 1000 lbs, the weight of slightly less than 120 gallons.

Was the waste amount disposed of or released greater than or equal to the RQ?

Unknown. There are no records or other documentation to suggest that a single release or a series of combined releases, throughout the history of operation at this facility, exceeded either of the RQs.

Current Regulatory Status: PRS 46-001 is on the Hazardous and Solid Waste Amendment (HSWA) module of LANL's Hazardous Waste Facility Permit. It was recommended for no further action (NFA) by the ER Project in the RCRA Facility Investigation (RFI) Work Plan submitted to the Environmental Protection Agency in August 1993 (reference below), on the basis of the fact that it is a waste accumulation area regulated under RCRA, and is not a historic release site.

Future Actions Required: No additional sampling is proposed at this time; however, such sampling could become necessary if the New Mexico Environment Department (NMED) determines that additional information is necessary to evaluate the recommendation for NFA. No remediation is proposed at this PRS.

References: "RFI Work Plan for OU 1140," Environmental Restoration Project, August 1993, LA-UR-93-1940.

"Re: Acid Waste Tank at TA-46", Tony Grieggs, June 20, 2001, email correspondence with Virginia Smith.

Potential Release Site (PRS): 46-008(a)

Location: Technical Area 46
Description: Inactive storage area.

History: PRS 46-008(a) is a 20-ft-square paved area to the east of TA-46-88. During a March 1988 CEARP survey, the inspector noted 28 very rusty, nitric acid drums. One drum, marked "waste", was leaking. The inspector in 1986 also noted that, to the east, were 30 very rusty nitric acid containers and a junk pile.

Is there any record of a hazardous substance having been on site?
Yes. Nitric acid is a CERCLA hazardous substances.

Was the amount stored greater than or equal to 1,000 kg or the RQ, whichever is greater?
Probably. The 1,000 lb RQ for nitric acid would be reached with 120 gallons, or 4 55-gallon drums of nitric acid.

Was the amount disposed of or released greater than or equal to the RQ?
Unknown. There are no records or other documentation to suggest that a single release or a series of combined releases, throughout the history of operation at this facility, exceeded either of the RQs.

Current Regulatory Status: This PRS is on the Hazardous and Solid Waste Amendment (HSWA) module of LANL's Hazardous Waste Facility Permit. It was recommended for Phase 1 sampling by the ER Project in the RCRA Facility Investigation (RFI) Work Plan submitted to the Environmental Protection Agency in August 1993 (reference below), on the basis of the fact that a visual inspection in 1986 indicated that there had been a surface release of a hazardous substance.

Future Actions Required: The RFI Work Plan (reference below) proposed the collection of two surface soil samples at this PRS, one located south and one located northeast of the asphalt pavement. These points receive runoff from the paved PRS surface. These samples were not yet collected as of June 2001, and will be collected at some point in the future, in accordance with the DOE/ER Project prioritization criteria for investigation and cleanup work. On the basis of such sampling, the ER Project will make a recommendation to the New Mexico Environment Department (NMED) based on human health and ecological risk, for either no further action, for remediation, or for additional characterization.

References: "RFI Work Plan for OU 1140," Environmental Restoration Project, August 1993, LA-UR-93-1940.

