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THIS FORM IS SUBJECT TO CHANGE. CONTACT THE RPF FOR LATEST VERSION. (JUNE 1997)

40

Los Alamos National Laboratory

UNIVERSITY OF CALIFORNIA

Environmental Restoration Project
MS M992
Los Alamos, New Mexico 87545
505-667-0808/FAX 505-665-4747

Date: September 16, 1998
Refer to: EM/ER:98-361

Received by ER-RPF
OCT 16 1998

Mr. Ted Taylor
US Department of Energy
Los Alamos Area Office, MS A316
Los Alamos, NM 87545

SUBJECT: RECOMMENDATION FOR NFA FOR THE SATELLITE ACCUMULATION AREAS: PRSs 40-007(a), 40-007(b), 40-007(c), 40-007(d), 40-007(e), 39-002(d), 39-002(e), AND 39-002(f) TO FULFILL PM FOR FUNCTIONAL AREA A.1.

Dear Ted:

Enclosed are two copies of an Resource Conservation and Recovery Act Facility Investigation (RFI) Report submitted for inclusion as No Further Actions (NFAs) under Functional Area A.1. The facility types are Satellite Accumulation Areas (SAA) (active or inactive) which are regulated by 40 CFR 262, Standards Applicable to Generators of Hazardous Waste. These SAAs include the Potential Release Sites (PRSs) 40-007(a), 40-007(b), 40-007(c), 40-007(d), 40-007(e), 39-002(d), 39-002(e) and 39-002(f). There is no evidence of any release having occurred at these locations (LANL 1993,26068; LANL 1993 15316). The RFI Report is complete and submitted to the Department of Energy-Los Alamos Area Office (DOE-LAAO) in satisfaction of Appendix F Performance Measures negotiated with DOE-LAAO dated April 3, 1998, and revised May 14, 1998.

This RFI Report is being submitted in fulfillment of the requirement for Performance Measure for Functional Area A.1, NFA Recommendations for Work Performed in Fiscal Year (FY98) (Enclosure 1), which requires submittal of the request document to DOE for review and approval. By way of this letter we are transmitting 8 additional PRSs for NFA. These PRSs, in addition to the 27 PRSs proposed in six transmittal letters and reports submitted earlier this month, represent a total of 35 A.1 Performance Measure PRSs submitted for NFA. This represents a performance rating of "outstanding". In accordance with Environmental Restoration (ER) Project procedures, this RFI Report has undergone internal peer review.

As required by the performance measure, this RFI report has addressed both human health and ecological risk in accordance with all ER procedures and report outline guidance. If you have any questions or comments, please contact Dave McInroy at 667-0819.

Sincerely,

Julie A. Canepa, Program Manager
Environmental Restoration Project

JC/TG/se

Enclosure(s): (1) NFA Recommendations for Work Performed in FY98
(2) Two copies of the RFI Report for Satellite Accumulation Areas: PRSs 40-007(a), 40-007(b), 40-007(c), 40-007(d), 40-007(e), 39-002(d), 39-002(e), and 39-002(f).

Cy (w/encs.):
J. Newlin, CST-7, MS M992
A. Pratt, EES-13, MS M992
RPF, MS M707, Record Package 306

Cy (w/o encs.):
T. Baca, EM, MS M992
D. Boak, TSA-1, MS M992
A. Dorries, TSA-11, MS M992
V. George, EM/ER, MS M992
J. Mose, LAAO, MS A316
D. Hickmott, EES-1, MS D462
R. Hutton, SAIC, MS J521
H. Orr, EM/ER, MS M992
EM/ER CT #C284 File, MS M992
EM/ER File, MS M992

Part A. Quantitative Measures

Functional Area A.1. No Further Action (NFA) recommendations for work performed in FY98. Weight 15%

Unsatisfactory	Submit fewer than 19 potential release sites (PRSs) for NFA recommendation.
Marginal	Submit 19 PRSs for NFA recommendation in FY98.
Good	Submit 24 PRSs for NFA recommendation in FY98.
Excellent	Submit 29 PRSs for NFA recommendation in FY98.
Outstanding	Submit 34 PRSs for NFA recommendation in FY98.

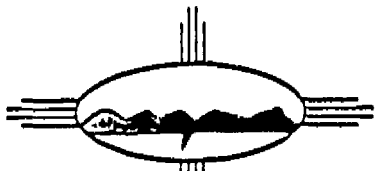
Assumptions

1. The number of NFA recommendations to obtain a "good" rating is based on the number in the ER Project Baseline (see General Assumption 1) and a delta of (20% from "good" for the other ratings.

2. The work performed in FY98 for NFA recommendations will include an evaluation of each PRS for human health risk, surface water [following the ER Project Administrative Procedure (AP) 4.5, *Evaluation of Potential Surface Water Concerns at Environmental Restoration Sites*], other applicable regulations and standards [following guidance received from the New Mexico Environment Department (NMED) regarding acceptance of NFA recommendations (Letter from Ed Kelley, Director Water and Waste Management Decisions to T.J. Taylor, DOE-LAAO and J. Jansen, LANL, Re: No Further Action Determinations Los Alamos National Laboratory NM0980010515, dated March 10, 1997], and an ecological risk evaluation [following Environmental Protection Agency Guidance (*Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments.* Interim Final Draft. USEPA 1997]. The human health risk assessment, surface water assessment, ecological risk evaluation, and applicable regulations and standards assessment will all lead to a no further action recommendation.

3. The NFA recommendations will follow the *Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Report Framework* Project Consistency Team (PCT) Policy (EM/ER:96-PCT-014), dated August 19, 1996, or as amended to reflect requirements as stated in (2) above, and documented in conjunction with DOE approval, or the *Final Reports for Voluntary Corrective Actions and Expedited Cleanups* PCT Policy (EM/ER:95-PCT-029, Rev.1) dated April 12, 1996, or as amended to reflect requirements as stated in (2) above, and documented in conjunction with DOE approval.

4. Credit for completion will be obtained when the NFA recommendation is submitted to the NMED for those PRSs listed in the Hazardous and Solid Waste Amendments (HSWA) Module to the Laboratory's RCRA Operating Permit. For those PRSs not listed in the HSWA Module, the NFA recommendation will be considered complete when the final report is submitted to and accepted by (following General Assumption 5) DOE-Los Alamos Area Office (LAAO). The report containing the NFA recommendation will be developed in conjunction with members of UC, contract personnel and members of DOE-LAAO. For those reports submitted to NMED, the report must receive approval from DOE-LAAO prior to submittal to NMED. The reports submitted to NMED will be submitted to DOE-LAAO at least ten working days before it is due to NMED (as documented in the ER Project Baseline dated September 26, 1997, or as amended and documented through a BCP). Those reports submitted only to DOE-LAAO will be submitted based on the schedule as documented in the ER Project Baseline dated September 26, 1997, or as amended and documented through a BCP.



LA-UR-98-4104
September 1998

RFI Report for Satellite Accumulation Areas

PRS 39-002(d)
39-002(e)
39-002(f)
40-007(a)
40-007(b)
40-007(c)
40-007(d)
40-007(e)

Environmental Restoration Project
A Department of Energy Environmental Cleanup Program

Los Alamos
NATIONAL LABORATORY
Los Alamos, NM 87545

Executive Summary

Eight satellite accumulation areas (SAAs) located in technical areas (TAs) 39 and 40 at Los Alamos National Laboratory (LANL) are recommended for no further action (NFA): potential release sites (PRSs) 39-002(d)-(f), and 40-007(a)-(e). This report presents a description of the operating practices and institutional controls employed at active and inactive satellite accumulation areas in support of the recommendations for no further action.

TA-39 is located in the southern portion of LANL and is bordered by Bandelier National Monument along New Mexico (NM) State Road 4 to the south and east. TA-40 is located in the central area of LANL and is bounded entirely by other TAs. TAs 39 and 40 historically have been used for high explosives research and testing. The five PRSs at TA 40 are used, and have been used since their inception in the 1950s, to store high explosive (HE)- contaminated wastes and HE product. They have been managed as SAAs under 40 CFR 262.34 since the inception of Resource Conservation and Recovery Act (RCRA) regulations. There is no documented or visible evidence of a release having occurred at any of these PRSs. The three PRSs at TA 39 were established in the 1980s as RCRA-regulated SAAs, and there is no documented or visible evidence of release having occurred at those three PRSs.

Each of the PRSs presented in Table ES-1 is currently or, in the case of areas administratively closed by LANL, has previously been a SAA, subject to administrative controls as defined by RCRA in 40 CFR §262.34. A generic description of basic operational activities and administrative controls that apply to SAAs is presented in the discussion following this table. The table itself describes the location and summarizes the operational history of each PRS.

TABLE ES-1

PRS DESCRIPTION AND OPERATIONAL HISTORY

PRS No.	Status	TA	Building	Former OU	Current/ Future Operations	Current/Future Land Use
40-007(a)	Active	40	3	1111	Firing sites	Industrial/Laboratory Operations
40-007(b)	Active	40	6	1111	Firing sites	Industrial/Laboratory Operations
40-007[c]	Active	40	11	1111	Firing sites	Industrial/Laboratory Operations
40-007(d)	Removed as SAA	40	14	1111	Firing sites	Industrial/Laboratory Operations
40-007(e)	Active	40	41	1111	Firing sites	Industrial/Laboratory Operations
39-002(d)	Removed as SAA	39	57	1132	Firing sites	Industrial/Laboratory Operations
39-002(e)	Removed as SAA	39	69	1132	Firing sites	Industrial/Laboratory Operations
39-002(f)	Removed as SAA	39	88	1132	Firing sites	Industrial/Laboratory Operations

The remainder of the executive summary describes the operational controls that apply to SAAs regulated under 40 CFR §262.34. This discussion is very detailed in the interest of fully illustrating why the PRSs proposed for NFA have no potential to become historical release sites.

A SAA is an accumulation area for hazardous or mixed waste located to serve a process, a room, or a suite of rooms where waste is generated. A SAA

- must be under control of the operator of the process generating the waste,
- may not serve waste generators on a different floor of a building,
- must have physical controls (for example, door or cabinet locks) in place if the area is located outside, and
- must have administrative and/ physical controls in place.

Administrative controls include, but are not limited to, consultation with a waste management coordinator, posting of the name and phone number of the SAA's primary contact, and the establishment of a list of authorized users.

A SAA may accumulate a total of 55 gallons of hazardous or mixed waste or 1 quart of acutely hazardous or mixed waste. If the volume limit is exceeded, the operator or generator marks the containers that caused the volume limit to be exceeded with the date the excess began. The SAA operator has 72 hours to transfer the waste to a less than 90-day storage area or to a treatment, storage, or disposal facility.

All containers holding hazardous or mixed wastes are marked with the words "HAZARDOUS WASTE" and the major constituents are listed. The container label may not have chemical formulas or abbreviations; the complete chemical names (common names) are placed on the container label. If the container holds mixed waste, it is also labeled "RADIOACTIVE". If the container is too small for a hazardous waste label to fit, then the label is placed on the tray or box the container is placed in. Small containers must indicate their contents so that proper segregation of incompatibles can be verified.

All containers are kept closed (in the manner intended by the manufacturer) at all times except when adding or removing waste from the container. Containers must be in good condition and compatible with the waste they are holding. Deteriorated or damaged containers must replaced immediately. It is not acceptable to package liquid and solid wastes together.

The SAA must be identified by a prominently posted sign that states "HAZARDOUS WASTE SATTELITE ACCUMULATION AREA" or "HAZARDOUS WASTE SATTELITE STORAGE AREA". If mixed waste is stored, appropriate radiological postings must also be placed.

All leaks or spills of hazardous or mixed waste must be cleaned up immediately, and the contaminated clean-up material must be managed as hazardous or mixed waste.

The SAA must be free of obstacles or deterioration that could cause a spill or accident or prevent access by emergency personnel and equipment. If ignitable hazardous waste is stored, the area must also be free of possible ignition sources. Containers that are stored out of doors are placed in a dry, preferably sheltered location, out of traffic patterns, on pallets, with drum covers in place to prevent damage to the containers. Containers stored outdoors are equipped with physical controls, such as locks, to prevent unauthorized addition or removal of their contents.

All waste containers are segregated according to the compatibility of the types of waste they hold (for example, acids and bases or acids and organics). Containers holding liquids must have

secondary containment such as a dike, berm, tray, etc. If nonhazardous waste and hazardous waste are stored in the same SAA, they are separately identified and physically segregated by means of a dike, berm, wall, separate secondary containment unit, separate shelf, or other device.

Additionally, owner/operators of SAAs are required to take, at a minimum, the Waste Generation Overview course. This course presents materials related to the management of SAAs and required administrative controls for the operation of SAAs.

In summary, SWMUs 39-002(d), (e), and (f), and 40-007(a)-(e) are recommended for NFA because they are SAAs that are either inactive or active and, in either case, they have been and continue to be regulated under 40 CFR §262, Standards Applicable to Generators of Hazardous Waste. The Laboratory conducts training classes for the operation of these areas, inspects, and has institutional controls governing the operation and closure of these units. The New Mexico Environment Department (NMED) also performs annual inspections.

There is no evidence of release having occurred at any of these SAAs (LANL 1993, 26068; LANL 1993, 15316). If a release were to occur at one of the active SAAs, it would be cleaned up immediately in accordance with the Laboratory's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or administrative requirements. Because any release from an active SAA would be cleaned up immediately, these units do not have the potential to become historical release sites. Therefore, the active SAAs will continue to be regulated under 3004(a) of RCRA, and not 3004(u), the Hazardous and Solid Waste Amendments.

The eight SAAs recommended here for NFA, and summarized in the table below, are not listed in Module VIII of the Laboratory's Hazardous Waste Facility Permit.

TABLE ES-2

SUMMARY OF PROPOSED ACTIONS

PRS No.	PRS Description	HSWA[1]	Radionuclide Component[2]	Proposed Action	Rationale for Recommendation	Section Number
39-002(d)	SAA	No	No	NFA, Criterion 4[3]	No historical release known to have occurred, and regulated under another authority (3004(a) of RCRA)	2.0
39-002(e)	SAA	No	No	NFA, Criterion 4	No historical release known to have occurred, and regulated under another authority (3004(a) of RCRA)	3.0
39-002(f)	SAA	No	No	NFA, Criterion 4	No historical release known to have occurred, and regulated under another authority (3004(a) of RCRA)	4.0
40-007(a)	SAA	No	No	NFA, Criterion 4	No historical release known to have occurred, and regulated under another authority (3004(a) of RCRA)	5.0
40-007(b)	SAA	No	No	NFA, Criterion 4	No historical release known to have occurred, and regulated under another authority (3004(a) of RCRA)	6.0
40-007(c)	SAA	No	No	NFA, Criterion 4	No historical release known to have occurred, and regulated under another authority (3004(a) of RCRA)	7.0
40-007(d)	SAA	No	No	NFA, Criterion 4	No historical release known to have occurred, and regulated under another authority (3004(a) of RCRA)	8.0
40-007(e)	SAA	No	No	NFA, Criterion 4	No historical release known to have occurred, and regulated under another authority (3004(a) of RCRA)	9.0

[1] If the site is listed in Module VIII of the Laboratory's Hazardous Waste Facility Permit, then "yes" applies. Otherwise, "no" applies.
[2] If a release has occurred at the PRS and radionuclides are associated with the release, then "yes" applies. Otherwise, "no" applies.
[3] NFA Criteria are listed in Section II.B.4.a.(4).(b), "No Further Action (NFA) Proposals Criteria," in the *NMED RCRA Permits Management Program Document Requirement Guide* (NMED 1098, ER ID 57897).

1.0 INTRODUCTION

Los Alamos National Laboratory (LANL or the Laboratory) is a multi-disciplinary research facility owned by the Department of Energy (DOE) and managed by the University of California. The Laboratory is located in north-central New Mexico approximately 60 miles northeast of Albuquerque and 20 miles northwest of Santa Fe. The Laboratory site covers 43 square miles of the Pajarito Plateau, which consists of a series of fingerlike mesas separated by deep canyons containing ephemeral and intermittent streams that run from west to east. Mesa tops range in elevation from approximately 6,200 ft to 7,800 ft. The eastern portion of the plateau stands 300 to 900 ft above the Rio Grande.

The Laboratory's Environmental Restoration (ER) Project is involved in a national effort by the DOE to clean up facilities that were formerly involved in weapons production. The goal of the ER Project is to ensure that DOE's past operations do not threaten human or environmental health and safety in and around Los Alamos County, New Mexico. To achieve that goal, the ER Project is currently investigating sites potentially contaminated by past Laboratory operations.

The eight sites that are the topic of this report are PRSs, which are not listed on Module VIII of the Laboratory's Hazardous Waste Facility Permit. The ER Project conducted only a review of historical information for these PRSs. No field investigations were conducted because there is no evidence, either historical or visual, that releases occurred at any of them. The recommendation for NFA for these sites is predicted on the fact that they are currently regulated under 40 CFR §262.34.

The PRSs included in this report are all satellite accumulation areas (SAAs) located at Technical Areas (TAs) 39 and 40. Specifically, they are PRSs 39-002(d)-(f) and 40-007(a)-(e). Figures 1.0-1 and 1.0-2 provide an overview of the Laboratory and illustrates the locations of these two TAs. Sections 2.0 – 9.0 present for each of the PRSs the specific information necessary to justify the recommendation for NFA. Because there is no evidence of release from these PRSs, many of the subsections addressed in a typical RCRA Facilities Investigation (RFI) report are not applicable. For consistency, all subsection headings are included and, if the contents of the subsection are not applicable, it is so stated. None of the appendices that are typically included in a RFI report are included in this document, because all of the applicable information is presented in the body of the report.

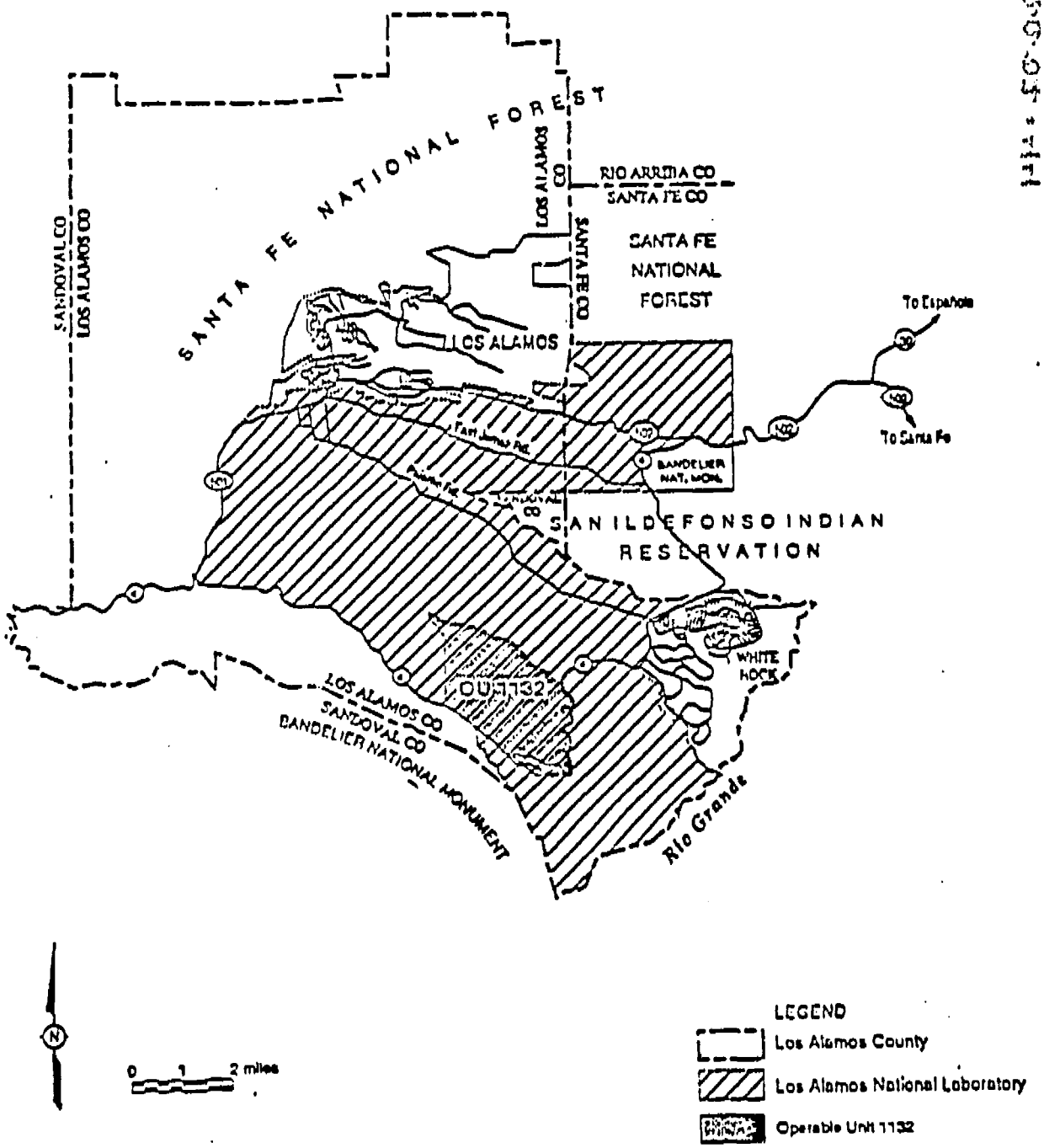


Figure 1.0-1. Location of former Operable Unit 1132 (which contains TA-39) with respect to Laboratory technical areas and surrounding land holdings.

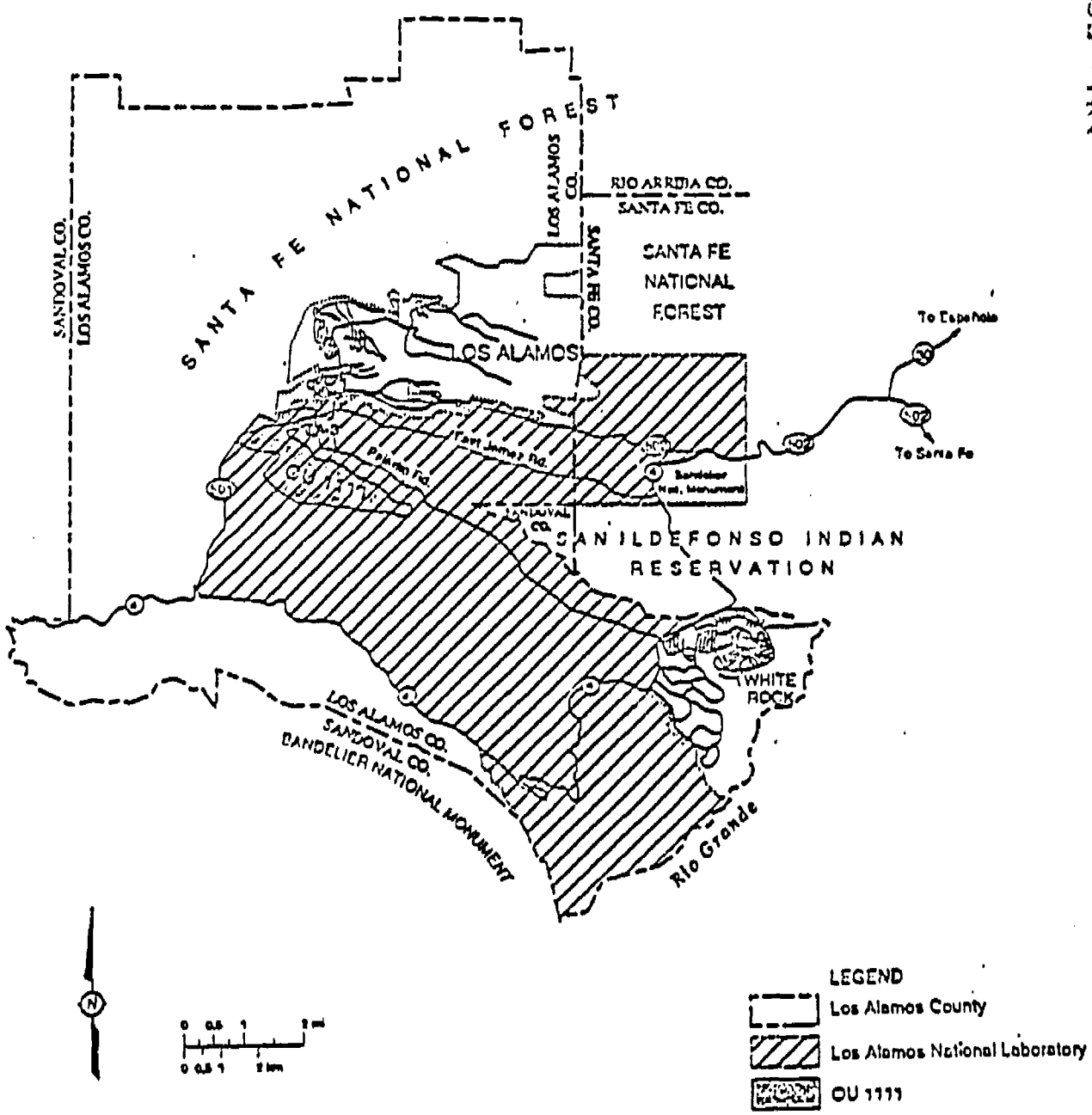


Figure 1.0-2. Location of former Operable Unit 1111 (which contains TA-40) with respect to Laboratory technical areas and surrounding land holdings.

2.0 PRS 39-002(d)

2.1 Summary

PRS 39-002(d) is a former SAA located on a gravel pad on the outside corner of building (TA-39-57) in Ancho Canyon. Building 39-57, is located at the northwest end of TA-39, which is located in the southeastern portion of the Laboratory and is bordered on the south by Bandelier National Monument. The TA was established in the 1950s as an area for the open-air testing of high explosives for the shock wave physics group. The PRS was used since the 1980s for the storage of photographic (Polaroid) wastes and cloth and paper contaminated with various substances such as acetone, ethanol, transformer oil, trichloroethane, vacuum grease, and copper sulfate.

2.2 Description and Operational History

2.2.1 Site Description

PRS 39-002(d) is a formerly active SAA located at TA-39 outside of Building 57. This PRS was an administratively controlled area subject to the requirements specified by RCRA in 40 CFR 262.34. This PRS was actively managed under the requirements detailed in the Executive Summary.

PRS 39-002(d) wastes were associated with photographic operations undertaken to document the propagation of HE detonations. Figure 2.2-1 shows the physical location of the site. PRS 39-002(d) is not listed in Module VIII of the Laboratory's Hazardous Waste Facility Permit.

Current Land Use

TA-39 was established as a remote, high-explosives test site. Experiments are conducted at the site to support research on equations-of-state, shock wave phenomena, development of implosion systems, development and application of explosively produced pulses of electrical power, and production of high magnetic fields.

Future Land Use

LANL does not anticipate any change from the current industrial use for the operational life of the Laboratory (LANL 1995, ER ID 57224).

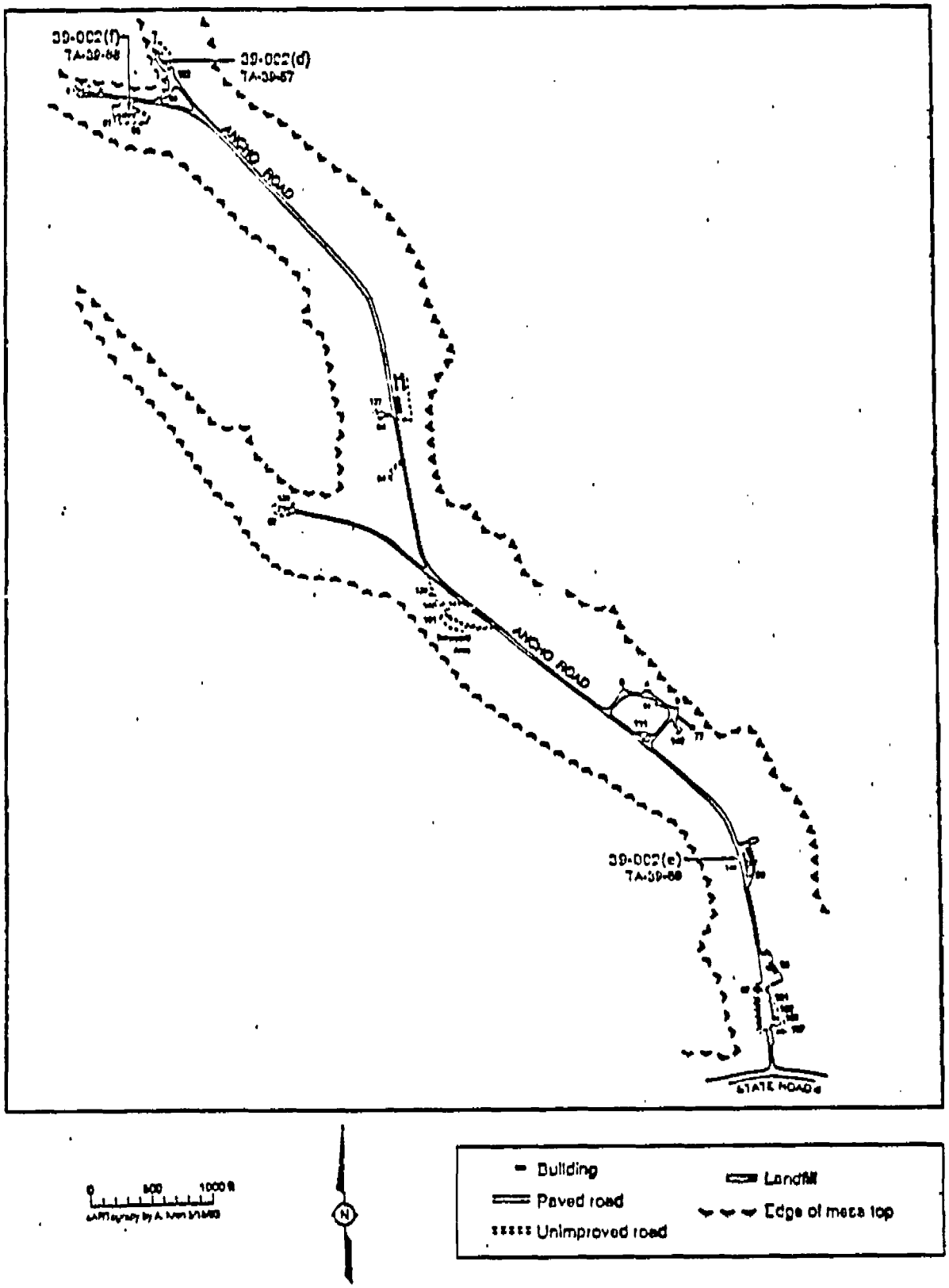


Figure 2.2-1. Location of PRSs 39-002(d, e, f) and associated physical features near TA-39.

2.2.2 Operational History

Building 57 at TA-39 was built in the 1950s for explosives testing. PRS 39-002(d) was a SAA established in the 1980s for wastes associated with the photographic documentation of such testing.

2.3 Investigatory Activities

2.3.1 Summary

The following discussion of the investigation activities for PRS 39-002(d) is based non-sampling data collection. Because PRS 39-002(d) is regulated under a separate authority (3004(a) of RCRA), data collection for this PRS consisted of a review of all waste management records associated with the PRS. Specifically, internal compliance auditing records for the SAA, conducted by the Hazardous and Solid Waste group (ESH-19), were reviewed for evidence of noncompliance with 40 CFR §262.34.

2.3.2 Previous Investigations

Previous historical research for this PRS, including the 1990 SWMU Reports (LANL 1990 ER ID 0145) and additional research conducted during the development of the RFI Workplan (LANL 1993 ER ID 15316, p. 5-18), indicate that no evidence of spills or leaks are visible or have ever been documented at this site.

Recent records related to the PRS date back to 1992, at which time the Laboratory instituted self-reporting and compliance auditing to verify compliance with RCRA regulations governing the operation of the SAA. Typical wastes consisted of Polaroid photographic wastes, and cloth and paper contaminated with common laboratory organics and copper sulfate. The SAA has not required any corrective action as a result of the operation of the area.

2.3.3 Preliminary Conceptual Model

A conceptual model is not applicable to this evaluation because no release from the PRS is known to have occurred.

2.3.4 Field Investigation and Data Evaluation

Sampling data were not collected at PRS 39-002(d).

2.3.5 Revised Site Conceptual Model

A conceptual model is not applicable to this evaluation because no release from the PRS is known to have occurred.

2.4 Site Assessment

No screening or risk assessments were performed for PRS 39-002(d).

2.5 Results and Conclusions

PRS 39-002(d) is a former SAA, outside Building 57 at TA-39 and was subject to requirements for active SAAs specified in 40 CFR 262.34. This PRS was originally identified in the 1990 SWMU Report, and that report states that there was no historical record or visual indication of a release at the site.

PRS 39-002(d) is recommended for NFA based on Criterion 4 even though no release is known to have occurred, because the site was subject to regulation under Section 3004(a), and not Section 3004(u), of RCRA.

3.0 PRS 39-002(e)

3.1 Summary

PRS 39-002(e) is a former SAA located on a covered concrete breezeway outside of building (TA-39-69) in Ancho Canyon. Building 39-69, located at the southern end of TA-39, is approximately a quarter mile north of state road 4. TA-39 is located in the southeastern portion of the Laboratory and is bordered on the south by Bandelier National Monument. The TA was established in 1953 as an area for the open-air testing of high explosives for the shock wave physics group. The PRS was used from 1980 to approximately 1992 for the storage of waste associated with propellant gun experiments.

3.2 Description and Operational History

3.2.1 Site Description

PRS 39-002(e) is a formerly active SAA located at TA-39 outside of Building 69. This PRS was an administratively controlled area subject to the requirements specified by RCRA in 40 CFR 262.34. This PRS was actively managed under the requirements detailed in the Executive Summary.

PRS 39-002(e) wastes are associated with the single-stage gas gun experiment and typically consisted of rags contaminated with Fantastik®; carbon dust; nylon; spent propellant cans; polaroid film; and metal. A total of about 60 gal of waste were generated per year (LANL 1993 ER ID 15316, pp. 5-18). Figure 2.2-1 shows the physical location of the site. PRS 39-002(e) is not listed in Module VIII of the Laboratory's Hazardous Waste Facility Permit.

Current Land Use

TA-39 was established as a remote, high-explosives test site. Experiments are conducted at the site to support research on equations-of-state, shock wave phenomena, development of implosion systems, development and application of explosively produced pulses of electrical power, and production of high magnetic fields.

Future Land Use

LANL does not anticipate any change from the current industrial use for the operational life of the Laboratory (LANL 1995, ER ID 57224).

3.2.2 Operational History

Building 69 at TA-39 was built in 1953 for explosives testing related to research and development of a two-stage gas gun. PRS 39-002(e) was a SAA established in the 1980s for wastes associated with the gas gun. This SAA, when operational, stored an estimated 4.5 gallons of waste per month.

3.3 Investigatory Activities

3.3.1 Summary

The following discussion of the investigation activities for PRS 39-002(e) is based non-sampling data collection. Because PRS 39-002(e) has been regulated under a separate authority, data collection for this PRS consisted of a review of all waste management records associated with the PRS. Specifically, internal compliance auditing records for the SAA, conducted by the Hazardous and Solid Waste group (ESH-19), were reviewed for evidences of noncompliance with 40 CFR §262.34.

3.3.2 Previous Investigations

Previous historical research for this PRS, including the 1990 SWMU Reports (LANL 1990 ER ID 0145) and additional research conducted during the development of the RFI Workplan (LANL 1993 ER ID 15316, pp. 5-18), indicate that no evidence of spills or leaks are visible or have ever been documented at this site.

Recent records related to the PRS date back to 1992, at which time the Laboratory instituted self-reporting and compliance auditing to verify compliance with RCRA regulations governing the operation of the SAA. Typical waste volumes were 4.5 gallons per month of wastes consisting of rags contaminated with Fantastik®, spent propellant cans, and metals. The SAA has had no corrective actions associated with the operation of the area.

3.3.3 Preliminary Conceptual Model

A conceptual model is not applicable to this evaluation.

3.3.4 Field Investigation and Data Evaluation

Sampling data were not collected at PRS 39-002(e).

3.3.5 Revised Site Conceptual Model

A conceptual model is not applicable to this evaluation.

3.4 Site Assessment

No screening or risk assessments were performed for PRS 39-002(e)

3.5 Results and Conclusions

PRS 39-002(e) is a former SAA, outside Building 69 at TA-39 and was subject to requirements for active SAAs specified in 40 CFR §262.34. Although this PRS was originally identified in the 1990 SWMU Report, there was no historical record or visual indications of a release at this site.

PRS 39-002(e) is recommended for NFA based on Criterion 4, because this site was subject to regulation under Section 3004(a), not Section 3004(u) of RCRA.

\4.0 PRS 39-002(f)

4.1 Summary

PRS 39-002(f) is a former SAA located on the asphalt driveway outside the northeast corner of building (TA-39-88) in Ancho Canyon. Building 39-88, is located at the northwest end of TA-39, which is located in the southeastern portion of the Laboratory and is bordered on the south by Bandelier National Monument. The TA was established in the 1950s as an area for the open-air testing of high explosives for the shock wave physics group. The PRS was used since the 1980s for the storage of photographic (Polaroid) wastes and cloth and paper contaminated with various substances such as acetone, ethanol, transformer oil, trichloroethane, vacuum grease, and copper sulfate.

4.2 Description and Operational History

4.2.1 Site Description

PRS 39-002(f) is a formerly active SAA located at TA-39 outside of Building 88. This PRS was an administratively controlled area subject to the requirements specified by RCRA in 40 CFR

§262.34. This PRS was actively managed under the requirements detailed in the Executive Summary.

PRS 39-002(f) wastes were associated with photographic operations undertaken to document the propagation of HE detonations. Figure 4.2-1 shows the physical location of the site. PRS 39-002(f) is not listed in Module VIII of the Laboratory's Hazardous Waste Facility Permit.

Current Land Use

TA-39 was established as a remote, high-explosives test site. Experiments are conducted at the site to support research on equations-of-state, shock wave phenomena, development of implosion systems, development and application of explosively produced pulses of electrical power, and production of high magnetic fields.

Future Land Use

LANL does not anticipate any change from the current industrial use for the operational life of the Laboratory (LANL 1995, ER ID 57224).

4.2.2 Operational History

Building 88 at TA-39 was built in the 1950s for explosives testing. PRS 39-002(f) was a SAA established in the 1980s for wastes associated with the photographic documentation of such testing.

4.3 Investigatory Activities

4.3.1 Summary

The following discussion of the investigation activities for PRS 39-002(f) is based non-sampling data collection. Because PRS 39-002(f) is regulated under a separate authority (3004(a) of RCRA), data collection for this PRS consisted of a review of all waste management records associated with the PRS. Specifically, internal compliance auditing records for the SAA, conducted by the Hazardous and Solid Waste group (ESH-19), were reviewed for evidence of noncompliance with 40 CFR §262.34.

4.3.2 Previous Investigations

Previous historical research for this PRS, including the 1990 SWMU Reports (LANL 1990 ER ID 0145) and additional research conducted during the development of the RFI Workplan (LANL 1993 ER ID 15316, p. 5-18), indicate that no evidence of spills or leaks are visible or have ever been documented at this site.

Recent records related to the PRS date back to 1992, at which time the Laboratory instituted self-reporting and compliance auditing to verify compliance with RCRA regulations governing the operation of the SAA. Typical wastes consisted of Polaroid photographic wastes, and cloth and paper contaminated with common laboratory organics and copper sulfate. The SAA has not required any corrective action as a result of the operation of the area.

4.3.3 Preliminary Conceptual Model

A conceptual model is not applicable to this evaluation because no release from the PRS is known to have occurred.

4.3.4 Field Investigation and Data Evaluation

Sampling data was not collected at PRS 39-002(f).

4.3.5 Revised Site Conceptual Model

A conceptual model is not applicable to this evaluation because no release from the PRS is known to have occurred.

4.4 Site Assessment

No screening or risk assessments were performed for PRS 39-002(f).

4.5 Results and Conclusions

PRS 39-002(f) is a former SAA, outside Building 88 at TA-39 and was subject to requirements for active SAAs specified in 40 CFR §262.34. This PRS was originally identified in the 1990 SWMU Report, and that report states that there was no historical record or visual indication of a release at the site.

PRS 39-002(f) is recommended for NFA based on Criterion 4 even though no release is known to have occurred, because the site was subject to regulation under Section 3004(a), and not Section 3004(u), of RCRA.

5.0 PRS 40-007(a)-Active Satellite Storage Area

5.1 Summary

PRS 40-007(a) is a SAA within a small building (TA-40-3) located at the southern end of TA-40. Building 40-3 is located on a gently sloping site approximately one hundred feet from the edge of Pajarito Canyon. This building has been used since 1950 for storage of waste contaminated by explosives (LANL 1990, 0145). The building is now used for both preparation of explosives tests at the TA-40 firing sites and waste storage. Customary housekeeping practices for explosives storage since TA-40 was built have been characterized by minimization of residues and accountability of material. As reported in the RFI Workplan for OU 1111 (LANL 1993, ER ID 26068), releases to the environment from this PRS are unlikely.

5.2 Description and Operational History

5.2.1 Site Description

PRS 40-007(a) is an active SAA located at TA-40 within Building 3. This PRS is an administratively controlled area subject to the requirements specified by RCRA in 40 CFR §262.34. These requirements are described in Executive Summary.

TA-40-3 is a small (~1000 sq. ft.) concrete block building that is currently used for HE detonator assembly and houses the SAA. Wastes accumulated in the SAA within Building 3, are associated with the HE detonator assembly and typically consist of rags contaminated with explosives. Figure 5.2-1 shows the physical location of the site. PRS 40-007(a) is not listed in Module VIII of the Laboratory's Hazardous Waste Facility Permit.

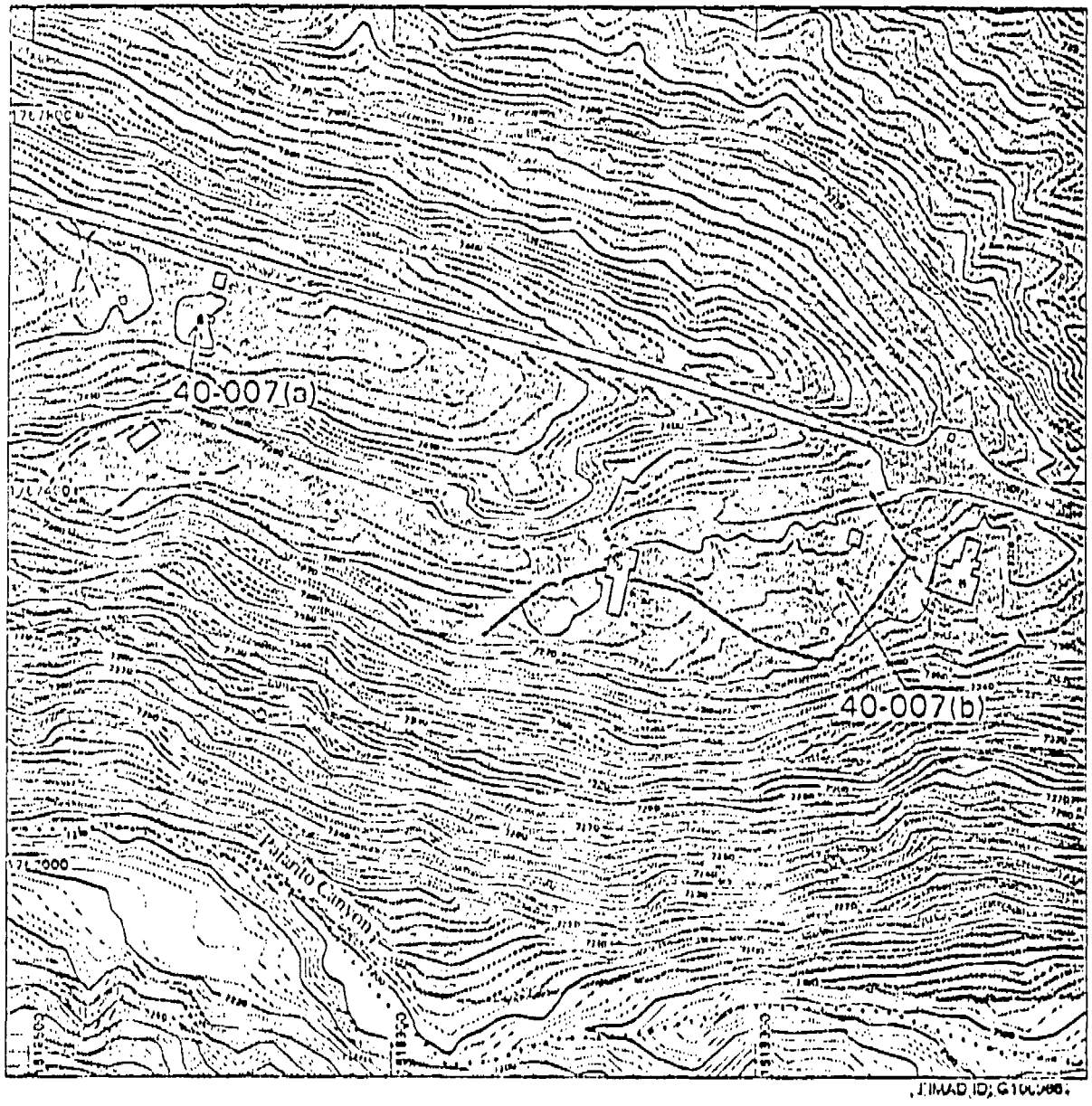


Figure 5.2-1. Location of PRSs 40-007(a, b) and associated physical features near TA-40.

Current Land Use

TA-40 is an industrial area containing six firing sites that have been used since 1950 for explosives testing related to research and development of detonators and other small explosives assemblies. TA-40 is a high-security area with restricted access. It is surrounded by chain link fence and has a gated entry. These security measures effectively eliminate the possibility of inadvertent site intrusion. No D&D activities are currently proposed for this site.

Future Land Use

LANL does not anticipate any change from the current industrial use for the operational life of the Laboratory (LANL 1995, ER ID 57224).

5.2.2 Operational History

TA-40, Detonator Firing Site, was built in 1950 for explosives testing related to research and development of detonators and other small explosives assemblies. Building 3, at TA-40, has traditionally (since 1950) been used for storage of high explosives (HE) and wastes associated with the detonator research. There are no floor drains or other routes to the environment from the SAA to the environment. This area is still active as a SAA, and typically generates 1-2 gallons of waste per month.

5.3 Investigatory Activities

5.3.1 Summary

The following discussion of the investigation activities for PRS 40-007(a) is based non-sampling data collection. PRS 40-007(a) is entirely contained within TA-40 Building 3; sampling data for this site was not collected.

Because PRS 40-007(a) has been regulated under a separate authority, data collection for this PRS consisted of a review of all waste management records associated with the PRS. Specifically,, internal compliance auditing records for the SAA, conducted by the Hazardous and Solid Waste group (ESH-19), were reviewed for evidences of noncompliance with 40 CFR §262.34.

5.3.2 Previous Investigations

Previous historical research for this PRS, including the 1990 SWMU Reports (LANL 1990 ER ID 0145) and additional research conducted during the development of the RFI Workplan (LANL 1993 ER ID 26068, pp. 5-100), indicate that releases of contaminants to the environment from PRS 40-007(a) are unlikely. On the basis of this historical research, the site was recommended for deferred action until building decommissioning. This recommendation for deferral was subsequently approved by the NMED.

Recent records related to the PRS date back to 1992, at which time the Laboratory instituted self-reporting and compliance auditing to verify compliance with RCRA regulations governing the operation of the SAA. A compliance checklist was generated on four separate occasions, over a period of three years, for the PRS. Typical waste volumes were less than 2 gallons of explosives contaminated wastes primarily consisting of rags contaminated with explosives. The SAA has had no corrective actions associated with the operation of the area.

5.3.3 Preliminary Conceptual Model

A conceptual model is not applicable to this evaluation.

5.3.4 Field Investigation and Data Evaluation

Sampling data was not collected at PRS 40-007(a).

5.3.5 Revised Site Conceptual Model

A conceptual model is not applicable to this evaluation.

5.4 Site Assessment

No screening or risk assessments were performed for PRS 40-007(a) because there has been no evidence of contamination at this PRS.

5.5 Results and Conclusions

PRS 40-007(a) is an active SAA, inside Building 3 at TA-40 and is subject to requirements for active SAAs specified in 40 CFR §262.34. Although this PRS was originally identified in the 1990 SWMU Report, there was no historical record or visual indications of a release at this site.

PRS 40-007(a) is recommended for NFA based on Criterion 4, because this site is subject to regulation under Section 3004(a), not Section 3004(u) of the RCRA regulations.

6.0 PRS 40-007(b)

6.1 Summary

PRS 40-007(b) is a SAA within a small building (TA-40-6) located at the southern end of TA-40. Building 40-6 is located on a gently sloping site approximately seventy feet from the edge of Pajarito Canyon. This building has been used since1950 for storage of waste contaminated by explosives (LANL 1990, 0145) . The building is now used for the preparation of explosives tests at the TA-40 firing sites. Customary housekeeping practices for explosives storage since TA-40 was built have been characterized by minimization of residues and accountability of material. As reported in the RFI Workplan for OU 1111 (LANL 1993, ER ID 26068), releases to the environment from this PRS are unlikely.

6.2 Description and Operational History

6.2.1 Site Description

PRS 40-007(b) is an active SAA located at TA-40 within Building 6. This PRS is an administratively controlled area subject to the requirements specified by RCRA in 40 CFR §262.34. These requirements are detailed in the Executive Summary.

TA-40-6 is a small (~1000 sq. ft.) concrete block building that is currently used for HE detonator assembly and houses the SAA. Wastes accumulated in the SAA within Building 6, are associated with the HE detonator assembly and typically consist of detonators, subassemblies, and cleaning materials contaminated with HE. Figure 5.2.1 shows the physical location of the site. PRS 40-007(b) is a SWMU not listed in Module VIII of the Laboratory's Hazardous Waste Facility Permit

Current Land Use

TA-40 is an industrial area containing six firing sites that have been used since 1950 for explosives testing related to research and development of detonators and other small explosives assemblies. TA-40 is a high-security area with restricted access. It is surrounded by chain link fence and has a gated entry. These security measures effectively eliminate the possibility of inadvertent site intrusion. No D&D activities are currently proposed for this site.

Future Land Use

LANL does not anticipate any change from the current industrial use for the operational life of the Laboratory (LANL 1995, ER ID 57224).

6.2.2 Operational History

TA-40, Detonator Firing Site, was built in 1950 for explosives testing related to research and development of detonators and other small explosives assemblies. Building 6, at TA-40, has traditionally (since 1950) been used for storage of high explosives (HE) and wastes associated with the detonator research. There are no floor drains or other routes to the environment from the SAA to the environment. This area is still active as a SAA, and typically generates 1-2 gallons of waste per month.

6.3 Investigatory Activities

6.3.1 Summary

The following discussion of the investigation activities for PRS 40-007(b) is based non-sampling data collection. PRS 40-007(b) is entirely contained within TA-40 Building 6; sampling data for this site was not collected.

Because PRS 40-007(b) has been regulated under a separate authority, data collection for this PRS consisted of a review of all waste management records associated with the PRS. Specifically, internal compliance auditing records for the SAA, conducted by the Hazardous and Solid Waste group (ESH-19), were reviewed for evidences of noncompliance with 40 CFR §262.34.

6.3.2 Previous Investigations

Previous historical research for this PRS, including the 1990 SWMU Report (LANL 1990 ER ID 0145) and additional research conducted during the development of the RFI Workplan (LANL 1993 ER ID 26068, pp. 5-100), indicate that releases of contaminants to the environment from PRS 40-007(b) are unlikely. On the basis of this historical research, the site was recommended for deferred action until building decommissioning. This recommendation for deferral was subsequently approved by the NMED.

Recent records related to the PRS date back to 1992, at which time the Laboratory instituted self-reporting and compliance auditing to verify compliance with RCRA regulations governing the

operation of the SAA. Typical waste volumes are less than 2 gallons of explosives contaminated wastes primarily consisting of detonators, subassemblies, and cleaning materials contaminated with HE. The SAA had no corrective actions associated with the operation of the area.

6.3.3 Preliminary Conceptual Model

A conceptual model is not applicable to this evaluation.

6.3.4 Field Investigation and Data Evaluation

Sampling data were not collected at PRS 40-007(b).

6.3.5 Revised Site Conceptual Model

A conceptual model is not applicable to this evaluation.

6.4 Site Assessment

No screening or risk assessments were performed for PRS 40-007(b) because there has been on evidence of contamination at this PRS.

6.5 Results and Conclusions

PRS 40-007(b) is an active SAA, inside Building 6 at TA-40 and is subject to requirements for active SAAs specified in 40 CFR 262.34. Although this PRS was originally identified in the 1990 SWMU Report, there was no historical record or visual indications of a release at this site.

PRS 40-007(b) is recommended for NFA based on Criterion 4, because this site is subject to regulation under Section 3004(a), not Section 3004(u) of RCRA.

7.0 PRS 40-007(c)

7.1 Summary

PRS 40-007(c) is a SAA within a small building (TA-40-11) located at the southern end of TA-40. Building 40-11 rests on a gently sloping site approximately one hundred feet from the edge of Pajarito Canyon. This building has been used since 1950 for storage of waste contaminated by explosives (LANL 1990, 0145). The building is now used for both preparation of explosives tests at the TA-40 firing sites and waste storage. Customary housekeeping practices for explosives storage since TA-40 was built have been characterized by minimization of residues and accountability of material. As reported in the RFI Workplan for OU 1111 (LANL 1993, ER ID 26068), releases to the environment from this PRS are unlikely.

7.2 Description and Operational History

7.2.1 Site Description

PRS 40-007(c) is an active SAA located at TA-40 within Building 11. This PRS is an administratively controlled area subject to the requirements specified by RCRA in 40 CFR §262.34. *Those requirements* are detailed in the Executive Summary.

TA-40-11 is a small (~1000 sq. ft.) concrete block building that is currently used for HE detonator assembly and houses the SAA. Wastes accumulated in the SAA within Building 11, are associated with the HE detonator assembly and typically consist of rags contaminated with explosives. *Figure 7.2-1 shows the physical location of the site.* PRS 40-007(c) is not listed in Module VIII of the Laboratory's Hazardous Waste Facility Permit.

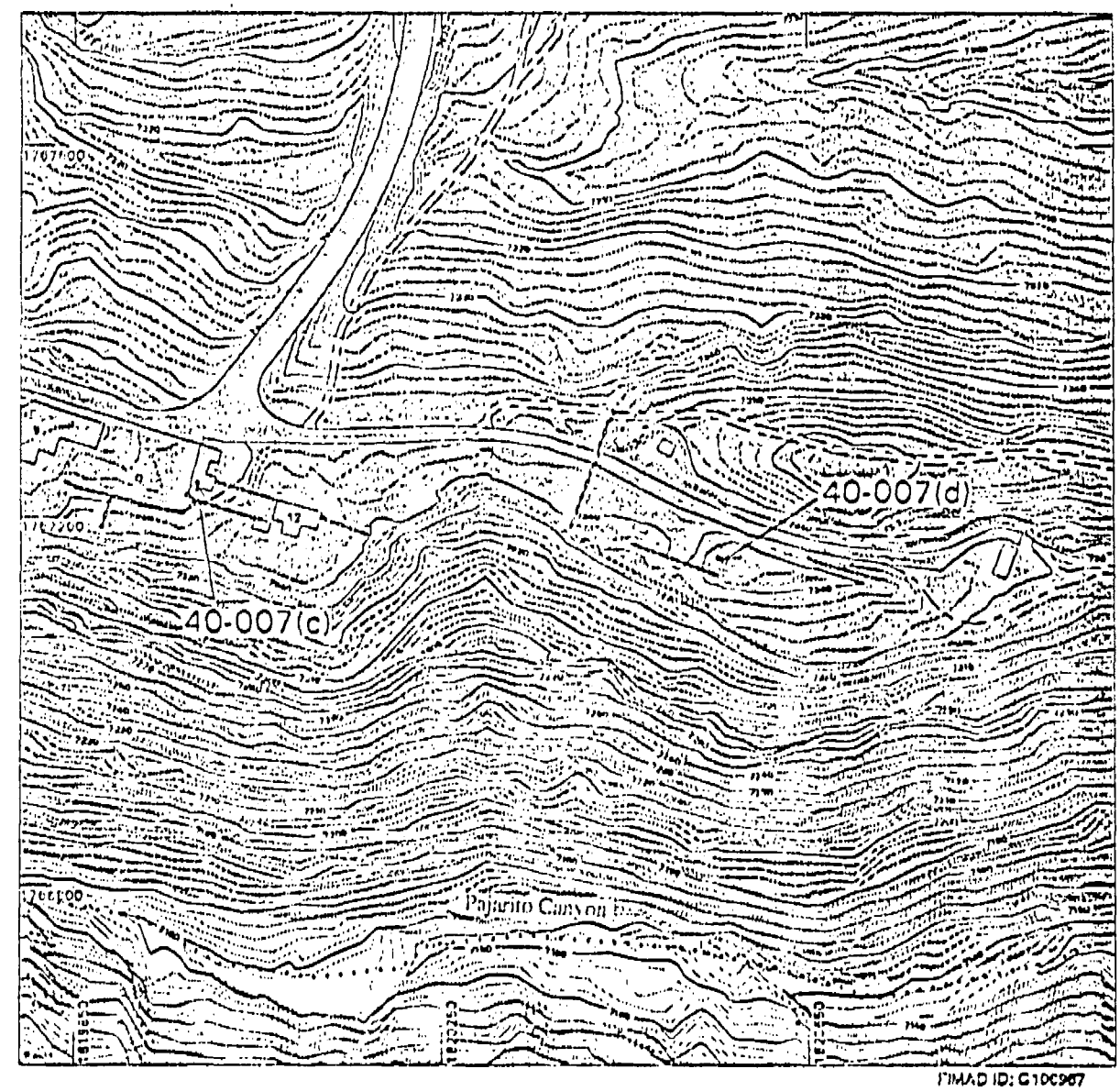


Figure 7.2-1. Location of PRSs 40-007(c, d) and associated physical features near TA-40.

Current Land Use

TA-40 is an industrial area containing six firing sites that have been used since 1950 for explosives testing related to research and development of detonators and other small explosives assemblies. TA-40 is a high-security area with restricted access. It is surrounded by chain link fence and has a gated entry. These security measures effectively eliminate the possibility of inadvertent site intrusion. No D&D activities are currently proposed for this site.

Future Land Use

LANL does not anticipate any change from the current industrial use for the operational life of the Laboratory (LANL 1995, ER ID 57224).

7.2.2 Operational History

TA-40, Detonator Firing Site, was built in 1950 for explosives testing related to research and development of detonators and other small explosives assemblies. Building 11, at TA-40, has traditionally (since 1950) been used for storage of high explosives (HE) and wastes associated with the detonator research. There are no floor drains or other routes to the environment from the SAA to the environment. This area is still active as a SAA, and typically generates 1-2 gallons of waste per month.

7.3 Investigatory Activities

7.3.1 Summary

The following discussion of the investigation activities for PRS 40-007(c) is based non-sampling data collection. PRS 40-007(c) is entirely contained within TA-40 Building 11; sampling data for this site was not collected.

Because PRS 40-007(c) has been regulated under a separate authority, data collection for this PRS consisted of a review of all waste management records associated with the PRS. Specifically, internal compliance auditing records for the SAA, conducted by the Hazardous and Solid Waste group (ESH-19), were reviewed for evidences of noncompliance with 40 CFR § 262.34.

7.3.2 Previous Investigations

Previous historical research for this PRS, including the 1990 SWMU Reports (LANL 1990 ER ID 0145) and additional research conducted during the development of the RFI Workplan (LANL 1993 ER ID 26068, pp. 5-100), indicate that releases of contaminants to the environment from PRS 40-007(c) are unlikely. On the basis of this historical research, the site was recommended for deferred action until building decommissioning. This recommendation for deferral was subsequently approved by the NMED.

Recent records related to the PRS date back to 1992, at which time the Laboratory instituted self-reporting and compliance auditing to verify compliance with RCRA regulations governing the operation of the SAA. A compliance checklist was generated on four separate occasions, over a period of three years, for the PRS. Typical waste volumes were less than 2 gallons of explosives contaminated wastes primarily consisting of rags contaminated with explosives. The SAA has had no corrective actions associated with the operation of the area.

7.3.3 Preliminary Conceptual Model

A conceptual model is not applicable to this evaluation.

7.3.4 Field Investigation and Data Evaluation

Sampling data were not collected at PRS 40-007(c).

7.3.5 Revised Site Conceptual Model

A conceptual model is not applicable to this evaluation.

7.4 Site Assessment

No screening or risk assessments were performed for PRS 40-007(c) because there has been on evidence of contamination at this PRS.

7.5 Results and Conclusions

PRS 40-007(c) is an active SAA, inside Building 11 at TA-40 and is subject to requirements for active SAAs specified in 40 CFR § 262.34. Although this PRS was originally identified in the 1990 SWMU Report, there was no historical record or visual indications of a release at this site.

PRS 40-007(c) is recommended for NFA based on NFA Criterion 4, because this site is subject to regulation under Section 3004(a), not Section 3004(u) of RCRA.

8.0 PRS 40-007(d)

8.1 Summary

PRS 40-007(d) is a SAA within a small building (TA-40-14) located at the southern end of TA-40. Building 40-14 rests on a gently sloping site approximately one hundred feet from the edge of Pajarito Canyon. This building has been used since 1950 for the storage of waste contaminated by explosives (LANL 1990, 0145). The building is now used for both preparation of explosives tests at the TA-40 firing sites and waste storage. Customary housekeeping practices for explosives storage since TA-40 was built have been characterized by minimization of residues and accountability of material. As reported in the RFI Workplan for OU 1111 (LANL 1993, ER ID 26068), releases to the environment from this PRS are unlikely.

8.2 Description and Operational History

8.2.1 Site Description

PRS 40-007(d) was a previously active SAA located at TA-40 within Building 14. This PRS was an administratively controlled area subject to the requirements specified by RCRA in 40 CFR 262.34. This PRS was actively managed under the requirements described in the Executive Summary, until 1993, when the SAA was removed from service.

TA-40-14 is a small (~1000 sq. ft.) concrete block building that is currently used for HE detonator assembly and houses the former SAA. Wastes accumulated in the SAA within Building 14, were associated with the HE detonator assembly and typically consisted of rags contaminated with explosives. Figure 7.2-1 shows the physical location of the site. PRS 40-007(d) is not listed in Module VIII of the Laboratory's Hazardous Waste Facility Permit.

Current Land Use

TA-40 is an industrial area containing six firing sites that have been used since 1950 for explosives testing related to research and development of detonators and other small explosives assemblies. TA-40 is a high-security area with restricted access. It is surrounded by chain link fence and has a gated entry. These security measures effectively eliminate the possibility of inadvertent site intrusion. No D&D activities are currently proposed for this site.

Future Land Use

LANL does not anticipate any change from the current industrial use for the operational life of the Laboratory (LANL 1995, ER ID 57224).

8.2.2 Operational History

TA-40, Detonator Firing Site, was built in 1950 for explosives testing related to research and development of detonators and other small explosives assemblies. Building 14, at TA-40, has traditionally (since 1950) been used for storage of high explosives (HE) and wastes associated with the detonator research. There are no floor drains or other routes to the environment from the former SAA to the environment. This area is no longer active as a SAA, but during operation typically generated 1-2 gallons of waste per month.

8.3 Investigatory Activities

8.3.1 Summary

The following discussion of the investigation activities for PRS 40-007(d) is based non-sampling data collection. PRS 40-007(d) was entirely contained within TA-40 Building 14; sampling data for this site was not collected.

Because PRS 40-007(d) has been regulated under a separate authority, data collection for this PRS consisted of a review of all waste management records associated with the PRS. Specifically, internal compliance auditing records for the SAA, conducted by the Hazardous and Solid Waste group (ESH-19), were reviewed for evidences of noncompliance with 40 CFR § 262.34.

8.3.2 Previous Investigations

Previous historical research for this PRS, including the 1990 SWMU Reports (LANL 1990 ER ID 0145) and additional research conducted during the development of the RFI Workplan (LANL 1993 ER ID 26068, pp. 5-100), indicate that releases of contaminants to the environment from PRS 40-007(d) are unlikely. On the basis of this historical research, the site was recommended for deferred action until building decommissioning. This recommendation for deferral was subsequently approved by the NMED.

Recent records related to the PRS date back to 1992, at which time the Laboratory instituted self-reporting and compliance auditing to verify compliance with RCRA regulations governing the operation of the SAA. A compliance checklist was generated on four separate occasions, over a period of three years, for the PRS. Typical waste volumes were less than 2 gallons of explosives contaminated wastes primarily consisting of rags contaminated with explosives. The SAA has had no corrective actions associated with the operation of the area.

8.3.3 Preliminary Conceptual Model

A conceptual model is not applicable to this evaluation.

8.3.4 Field Investigation and Data Evaluation

Sampling data were not collected at PRS 40-007(d).

8.3.5 Revised Site Conceptual Model

A conceptual model is not applicable to this evaluation.

8.4 Site Assessment

No screening or risk assessments were performed for PRS 40-007(d) because there has been no evidence of a release at this PRS.

8.5 Results and Conclusions

PRS 40-007(d) is a previously active SAA, inside Building 14 at TA-40 and was subject to requirements for active SAAs specified in 40 CFR § 262.34. Although this PRS was originally identified in the 1990 SWMU Report, there was no historical record or visual indications of a release at this site.

PRS 40-007(d) is recommended for NFA based on NFA Criterion 4, because this site is subject to regulation under Section 3004(a), not Section 3004(u), of RCRA.

9.0 PRS 40-007(c)

9.1 Summary

PRS 40-007(c) is a SAA within a small building (TA-40-41) located at the southern end of TA-40. Building 40-41 rests on a gently sloping site approximately several hundred feet from the edge of Pajarito Canyon. This building has been used since 1950 for the storage of waste contaminated by explosives (LANL 1990, 0145). The building is now used for both preparation of explosives

tests at the TA-40 firing sites and waste storage. Customary housekeeping practices for explosives storage since TA-40 was built have been characterized by minimization of residues and accountability of material. As reported in the RFI Workplan for OU 1111 (LANL 1993, ER ID 26068), releases to the environment from this PRS are unlikely.

9.2 Description and Operational History

9.2.1 Site Description

PRS 40-007(e) is an active SAA located at TA-40 within Building 41. This PRS was an administratively controlled area subject to the requirements specified by RCRA in 40 CFR § 262.34. This PRS was actively managed under the requirements detailed in Section 1.0, Introduction.

TA-40-41 is a small (~1000 sq. ft.) concrete block building that is currently used for HE detonator assembly and houses the SAA. Wastes accumulated in the SAA within Building 41, are associated with the HE detonator assembly and typically consist of rags contaminated with explosives. Figure 9.2-1 shows the physical location of the site. PRS 40-007(e) is not listed in Module VIII of the Laboratory's Hazardous Waste Facility Permit.

Current Land Use

TA-40 is an industrial area containing six firing sites that have been used since 1950 for explosives testing related to research and development of detonators and other small explosives assemblies. TA-40 is a high-security area with restricted access. It is surrounded by chain link fence and has a gated entry. These security measures effectively eliminate the possibility of inadvertent site intrusion. No D&D activities are currently proposed for this site.

Future Land Use

LANL does not anticipate any change from the current industrial use for the operational life of the Laboratory (LANL 1995, ER ID 57224).

9.2.2 Operational History

TA-40, Detonator Firing Site, was built in 1950 for explosives testing related to research and development of detonators and other small explosives assemblies. Building 41, at TA-40, has

traditionally (since 1950) been used for storage of high explosives (HE) and wastes associated with the detonator research. There are no floor drains or other routes to the environment from the SAA to the environment. This area is an active SAA that typically generates 1-2 gallons of waste per month.

9.3 Investigatory Activities

9.3.1 Summary

The following discussion of the investigation activities for PRS 40-007(a) is based non-sampling data collection. PRS 40-007(a) was entirely contained within TA-40 Building 41; sampling data for this site was not collected.

Because PRS 40-007(a) has been regulated under a separate authority, data collection for this PRS consisted of a review of all waste management records associated with the PRS. Specifically, internal compliance auditing records for the SAA, conducted by the Hazardous and Solid Waste group (ESH-19), were reviewed for evidences of noncompliance with 40 CFR § 262.34.

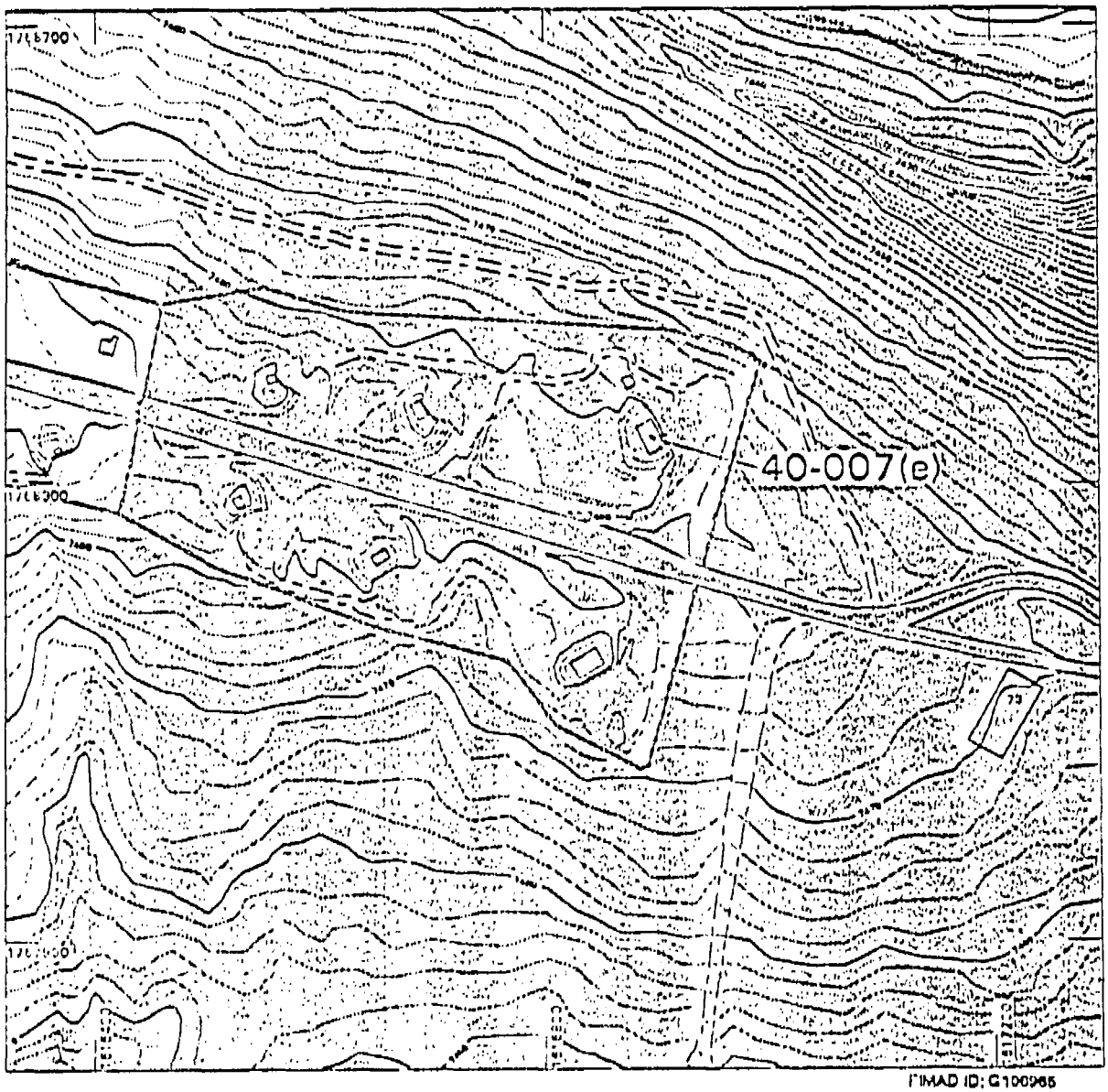


Figure 9.2-1. Location of PRS 40-007(e) and associated physical features near TA-40.

9.3.2 Previous Investigations

Previous historical research for this PRS, including the 1990 SWMU Reports (LANL 1990 ER ID 0145) and additional research conducted during the development of the RFI Workplan (LANL 1993 ER ID 26068, pp. 5-100), indicate that releases of contaminants to the environment from PRS 40-007(e) are unlikely. On the basis of this historical research, the site was recommended for deferred action until building decommissioning. This recommendation for deferral was subsequently approved by the NMED.

Recent records related to the PRS date back to 1992, at which time the Laboratory instituted self-reporting and compliance auditing to verify compliance with RCRA regulations governing the operation of the SAA. A compliance checklist was generated on four separate occasions, over a period of three years, for the PRS. Typical waste volumes are less than 2 gallons of explosives contaminated wastes primarily consisting of rags contaminated with explosives. The SAA has had no corrective actions associated with the operation of the area.

9.3.3 Preliminary Conceptual Model

A conceptual model is not applicable to this evaluation.

9.3.4 Field Investigation and Data Evaluation

Sampling data were not collected at PRS 40-007(e).

9.3.5 *Revised Site Conceptual Model*

A conceptual model is not applicable to this evaluation.

9.4 Site Assessment

No screening or risk assessments were performed for PRS 40-007(e) because there has been no evidence of a release at this PRS.

9.5 Results and Conclusions

PRS 40-007(e) is an active SAA, inside Building 41 at TA-40 and is subject to requirements for active SAAs specified in 40 CFR 262.34. 'Although this PRS was originally identified in the 1990 SWMU Report, there was no historical record or visual indications of a release at this site.

PRS 40-007(a) is recommended for NFA based on NFA Criterion 4 because this site is subject to regulation under Section 3004(a), not Section 3004(u), of RCRA.

10.0 References

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LANL (Los Alamos National Laboratory) 1995. "Site Development Plan, Annual Update 1995," Los Alamos National Laboratory Publication, LALP-95-113, Los Alamos, New Mexico. (LANL 1995, ER ID 57224)

LANL (Los Alamos National Laboratory) August 1993, "RFI Work Plan for Operable Unit 1111," Los Alamos National Laboratory LA-UR-93-2166, Los Alamos, New Mexico. (LANL 1993, ER ID 26068)

LANL (Los Alamos National Laboratory) 1990, "Solid Waste Management Unit Report," Los Alamos National Laboratory LA-UR-90-3400, Los Alamos, New Mexico. (LANL 1990, ER ID 0145)