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RON CURRY
SECRETARY

FACT SHEET/STATEMENT OF BASIS
October 26, 2006

**Notice of Intent to Approve a Permit Modification for No Further Action to Remove
Twenty Three Solid Waste Management Units (SWMUs) from
RCRA Permit No. NM0890010515
U.S. Department of Energy/Los Alamos National Laboratory
Los Alamos, New Mexico**

The New Mexico Environment Department (NMED) has made a determination to approve U.S. Department of Energy/Los Alamos National Laboratory (the Permittees) request to remove twenty-three solid waste management units (SWMUs) from the Hazardous and Solid Waste Amendments (HSWA) Corrective Action Module (Module VIII). This module is part of the Permittee's Resource Conservation and Recovery Act (RCRA) Permit.

A. FACILITY DESCRIPTION

Los Alamos National Laboratory (LANL) is a federal facility comprised of approximately 40 square miles and is located adjacent to the town of Los Alamos, New Mexico. LANL is surrounded by the Pueblo of San Ildefonso, Los Alamos County, Bandelier National Monument, Santa Fe National Forest, Santa Fe County, and Bureau of Land Management lands. The facility is located on a mesa and canyon landscape with relief up to approximately 300 feet from the tops of the mesa to the canyon bottoms. The majority of the buildings and technical areas (TAs) are located on the mesa tops. LANL has been in operation since the early 1940s. It is owned by the U.S. Department of Energy and co-operated by the Los Alamos National Security, LLC (LANS). The LANL facility was the site of research and development of the first atomic bomb. Throughout its history, the LANL facility has conducted experimental research on nuclear weapons and explosive materials. Disposal activities started in the early 1940's and continue to present day.

B. HISTORY OF INVESTIGATION

The U.S. Environmental Protection Agency (EPA) issued a Hazardous and Solid Waste Amendment (HSWA) Module VIII to the RCRA Hazardous Waste Facility permit on March 8, 1990. The effective date for the permit module was May 23, 1990. The original RCRA permit required investigation of 603 SWMUs. Additional SWMUs have been added to the RCRA permit through subsequent permit modifications comprising a total of approximately 1000 SWMUs requiring investigation under the RCRA corrective action process. On January 2, 1996, NMED

received authorization for Corrective Action and is consequently the regulatory authority for this action.

Permittees have previously, through five submittals, to date, through five Class III Permit Modifications, NMED has removed total of 146 SWMUs from the Permit. In February 2002, the Permittees withdrew 51 SWMUs from no further action (NFA) consideration because these SWMUs needed further investigation. Subsequently, the Permittees submitted supplemental information for two SWMUs that, upon review, were deemed appropriate for NFA and are included in this permit modification to remove from the Permit. The remaining 9 SWMUs will be the subject of further study and or investigation.

NMED received a permit modification request, dated June 1, 2001 to remove 25 SWMUs from the Module VIII of the Permit. Subsequently, the Permittees withdrew one SWMU from the NFA request, and one SWMU that was included in this request has already been removed from the Permit during a previous Class III Permit Modification (September 5, 2003). NMED has reviewed the request and has determined that at this time, eighteen of the twenty-three SWMUs are appropriate for an NFA determination and removal from the Permit. The remaining five SWMUs require further study and/or investigation.

NMED received another permit modification request, dated August 5, 2005 to remove three SWMUs from the Module VIII of the Permit. NMED has conducted a review of the document and determined that these three SWMUs are appropriate for NFA and for removal from the permit.

C. INVESTIGATION RESULTS

During investigation, it was determined that certain sites identified as SWMUs never managed hazardous waste including hazardous constituents regulated under RCRA or the sites never existed. Some of the sites never released any hazardous wastes or constituents to the environment. Some of the sites were remediated in accordance with state and/or federal regulations. Five NFA criteria were developed and utilized during the SWMU investigations. At this time, NMED has identified twenty-two of these SWMUs as appropriate for a NFA determination, and have categorized them based on these criteria. Brief descriptions of each of the SWMUs proposed for NFA approval are included in Section I. A more detailed description can be found in the related RCRA Facility Investigation (RFI) Work Plans, Voluntary Corrective Action (VCA) Work Plans, VCA Completion Reports and RFI Reports as referenced in the Permit Modification Requests. References are provided in Section J, Supporting Documentation.

D. ADMINISTRATIVE RECORD

The Administrative Record for this proposed action consists of the LANL Permit Modification Request, Fact Sheet/Statement of Basis, the Public Notice, the Proposed Revised Tables A and C, and the referenced supporting documentation. The Administrative Record may be reviewed at the following locations during the public comment period:

NMED – Hazardous Waste Bureau	LANL Community Relations Reading Room
2905 Rodeo Park Drive East, Building. 1	1619 Central Avenue
Santa Fe, New Mexico 87505-6303	Los Alamos, New Mexico 87545
(505) 428-2500	(505) 665-4400
<i>Monday – Friday from 8:00 a.m. to 5:00 p.m.</i>	<i>Monday - Friday from 8:00 a.m. to 5:00 p.m.</i>

A copy of Fact Sheet/Statement of Basis, the Public Notice, and the Proposed Revised Tables A and C are also available on the NMED website at www.nmenv.state.nm.us/HWB/lanlperm.html under No Further Action. To obtain a copy of the Administrative Record or a portion thereof, in addition to further information please contact Ms. Pam Allen at (505) 428-2531, or at the address given above. NMED will provide copies, or portions thereof, of the administrative record at a cost to the requestor.

E. NO FURTHER ACTION DETERMINATION

NMED’s determination that NFA is appropriate at these SWMUs is based on sampling and analytical data, field surveys, historical records, aerial photographs, and employee interviews that indicate that no or insignificant release(s) of hazardous wastes to the environment or residual contamination at concentrations less than acceptable risk-based levels. The determination is based on the following five NFA criteria:

1. The site does not exist; is a duplicate of another site; cannot be located; or is located within another site and, has been or will be, investigated as part of that site.
2. The site was never used for the management (that is, generation, treatment, storage or disposal) of RCRA solid or hazardous wastes and/or constituents.
3. The SWMU is not known or suspected of releasing RCRA solid or hazardous wastes and/or constituents to the environment. The term “release” means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous constituents) into the environment.

4. The SWMU is regulated under another state and/or federal authority. If the SWMU is known or suspected of releasing RCRA solid or hazardous wastes and/or constituents to the environment, it has been or will be investigated and/or remediated in accordance with the applicable state and/or federal regulation.
5. The SWMU was characterized or remediated in accordance with applicable state and/or federal regulations, and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use.

Each site proposed for NFA is described under the applicable NFA criteria in Section I.

F. PUBLIC PARTICIPATION

Public notification is required by the New Mexico Hazardous Waste Management Regulations, 20.4.1.901 NMAC. Upon submittal of a request for permit modification, a facility is required to publish a notice in a local newspaper and send notices to all persons on the facility mailing list maintained by NMED. The facility's notice announces a 60-day comment period for the request for permit modification and indicates the time, date, and place where a public meeting is to be held. Comments made during the public comment period are addressed to NMED for consideration during the review process. Upon review of the request for permit modification by NMED, a list of SWMUs that are deemed appropriate for NFA must be published in a local newspaper and public notices must be sent to all persons on the facility mailing list. As part of this process, the public may make comments to and/or request additional information from NMED during a 60-day public comment period.

As required by the New Mexico Hazardous Waste Management Regulations, 20.4.1.900 NMAC, the Permittees held public meetings on September 13, 2005, July 18, 2001; and May 9, 1995 to meet the requirements of public participation on the various sites.

NMED issued a public notice on **October 26, 2006**, to announce the beginning of a 60-day comment period that will end at **5:00 p.m. on December 26, 2006**. Any person who wishes to comment on this action or request a public hearing should submit written or electronic mail (e-mail) comment(s) with the commenter's name and address to the address below. Only comments and/or requests received on or before **5:00 p.m. December 26, 2006** will be considered.

John E. Kieling, Program Manager
Hazardous Waste Bureau - New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303
Or via e-mail: john.kieling@state.nm.us
Ref: Los Alamos National Laboratory – 23 NFA (October 26, 2006)

Written comments must be based on the information available for review. Documents in the administrative record need not be re-submitted if expressly referenced by the commenter. Requests for a public hearing shall provide: (1) a clear and concise factual statement of the nature and scope of the interest of the person requesting the hearing; (2) the name and address of all persons whom the requestor represents; (3) a statement of any objections to the proposed Permit, Modification; and (4) a statement of the issues which the commenter proposes to raise for consideration at the hearing. The NMED will provide a thirty (30) day notice of a public hearing, if scheduled.

G. FINAL DECISION

The NMED must ensure that the approved draft Permit is consistent with the New Mexico Hazardous Waste Management Regulations. All written comments submitted on the draft Permit will become part of the administrative record, be considered in formulating a final decision, and may cause the draft Permit to be modified. NMED will briefly describe and respond to all comments received during the public comment period, the response will specify which provisions, if any, of the draft Permit have been changed in the final Permit decision, and the reasons for the change. This response will also be posted on the NMED website in addition to being provided to all persons presenting written comments.

After consideration of all the written public comments received, the NMED will issue, or modify and issue the Permit. If the NMED modifies and issues the Permit, the Permittees shall be provided by mail a copy of the modified Permit and a detailed written statement of reasons for the modifications. The NMED Secretary will make the final Permit decision publicly available and shall notify the Permittees by certified mail. The Secretary's decision shall constitute a final agency decision and may be appealed as provided by the Hazardous Waste Act. All persons on the mailing list, or presenting written comments, or who requested notification in writing, will be notified of the final decision by mail.

The final decision will become effective thirty days after service of the decision, unless a later date is specified or review is requested under the New Mexico Hazardous Waste Management Regulations, 20.4.1 NMAC, Section 901.E., *Hearings*.

H. CONTACT PERSON FOR ADDITIONAL INFORMATION

John E. Kieling
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505
(505) 428-2500

I. DESCRIPTION OF SWMUs PROPOSED FOR NO FURTHER ACTION

SWMUs proposed for removal from the Permit

NFA Criterion 2. The site was never used for the management (that is, generation, treatment, storage or disposal) of RCRA solid or hazardous wastes and/or constituents.

2-1 SWMU 3-009(d), Surface Disposal Area:

SWMU 3-009(d) was proposed for NFA in a Request for Permit Modification submitted to EPA in September 1995. It is approximately 20 x 40 feet construction debris disposal site, small piles of cured asphalt, pieces of concrete and rebar, tree branches, empty wooden cable reels etc. were discarded. The disposal area is near a wooded area southwest of transportable Building TA-3-1572 on the edge of Two Mile Canyon. A culvert empties between the two debris piles, resulting in a large erosion gully. The asphalt may have been discarded after paving the nearby parking lot. Based on the archival photographs, the asphalt appears to have been deposited there in 1950s. There is no evidence or documentation of hazardous waste disposal at the site. No radioactivity above background levels was detected at the site using screening instruments. The Laboratory, NMED, DOE Surface Water Assessment Team inspected the site in February of 1999. As a result of this assessment, debris was removed from the drainage and a gabion was installed in August of 1999 to control erosion. NMED personnel conducted a site tour on June 13, 2002. The erosion controls seem to be functioning successfully. SWMU 3-009(d) is appropriate for NFA under Criterion 2 because it was never used for the management of RCRA hazardous waste and/or constituents.

2-2 SWMU 15-010(c), Active Storm Drainline and Outfall:

SWMU 15-010(c) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 15-010(c) consists of an active storm drainline that collects only storm water from the exterior of Building TA-15-92 and channels it towards an outfall at the edge of Water Canyon. The steel drainline has been in place from the time of the construction of Building TA-15-92, the camera firing point. The drain line was mistakenly identified as a sanitary sewer line in the Comprehensive Environmental Assessment Response Program Report and in the 1990 SWMU Report. The "NOTES" section of the 1990 SWMU Report that identified the site as sanitary sewer line stated that new information on SWMU 15-010(c) suggests that this unit is actually a storm drain and should not be considered a SWMU. The SWMU report also stated that, based on the interviews with operating group members, the information appears to be incorrect and the drain may actually be a storm drain. In 1993-94, Santa Fe Engineering conducted a study to identify building drain piping, locate outfalls and characterize wastewater flows and sources that existed at the time of the study. Drain piping was verified by dye checking. The study concluded that Building TA-15-92 contains no drains of any kind. NMED and

Environmental Protection Agency (EPA) personnel conducted a site tour on August 9, 2001 and found no evidence of the drainline and outfall being associated with management of the hazardous waste and/or constituents. SWMU 15-010(c) is appropriate for NFA under NFA Criterion 2 because it was misidentified and was never used for the management of RCRA hazardous waste and/or constituents.

2-3 SWMU 16-026(a2), Active Storm Outfall and Associated Drainline:

SWMU 16-026(a2) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 16-026(a2) is an active storm outfall and associated drainline from the roof drains of Building TA-16-200. The Building TA-16-200 was built in 1951-52 and became operational in 1953. It has been used as an administrative office building from the time of its construction and was never used for management of hazardous waste or constituents. The building is located outside of the fenced (High Explosives) HE processing area. As-built engineering drawings show that the drainline and associated outfall were built to collect rainwater and disperse it from the roof of Building TA-16-200. All roof drains from the Building TA-16-200 tie into a storm drainline and all floor drains tie into a sanitary sewer line. NMED and EPA personnel conducted a site tour on August 9, 2001 and concurred with the Permittees that drainline and outfall were associated with an administrative building and were indeed associated with storm water. SWMU 16-026(a2) is appropriate for NFA under Criterion 2 because it was never used for the management of RCRA hazardous waste and/or constituents.

2-4 SWMU 16-026(d2), Outfall and Associated Drainline:

SWMU 16-026(d2) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 16-026(d2) is an outfall and its associated drainline that serves floor drain of the utility room of HE rest house, TA-16-435. The outfall was constructed to receive steam condensate from equipment used to heat the building associated with the outfall. A rest house is an auxiliary building used for intermediate storage of HE materials before HE was assembled, processed and machined. The rest house is constructed of reinforced concrete and concrete floors. Metal double doors open to an exterior loading dock in the front of the building. The building has no windows and the rear of the building is connected to the HE processing building through an enclosed passageway. The rest house is physically remote from other buildings and is surrounded on three sides by an earthen berm. The rest house has a separate 4-feet by 8-feet utility room equipped with one steam pump and one small compressor that are used to heat and ventilate the building. The utility room can only be accessed from outside and is not accessible from the rest house. The utility room has a single floor drain that discharges steam condensate through a vitrified clay pipe to an outfall located away from the utility room. The floor drain in the utility room was plugged in 1992 and was unplugged in 1997 as a safety precaution to prevent accumulated moisture from shorting out the electrical equipment. On August 9, 2001, NMED and EPA personnel conducted a tour of the rest house and the utility room. The rest houses are located in the high security,

restricted access double-fenced area. SWMU 16-026(d2) is appropriate for NFA under Criterion 2 because it has never managed RCRA hazardous waste and/or constituents.

2-5 SWMU 16-026(e2), Outfall and Associated Drainline:

SWMU 16-026(e2) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 16-026(e2) is an outfall and its associated drainline that serves floor drain of the utility room of HE rest house, TA-16-415. The outfall was constructed to receive steam condensate from equipment used to heat the building associated with the outfall. A rest house is an auxiliary building used for intermediate storage of HE materials before HE was assembled, processed and machined. The rest house is constructed of reinforced concrete and concrete floors. Metal double doors open to an exterior loading dock in the front of the building. The building has no windows and the rear of the building is connected to the HE processing building through an enclosed passageway. The rest houses were physically remote from other buildings and were usually surrounded on three sides by an earthen berm. The rest house has a separate 4-foot by 8-foot utility room equipped with one steam pump and one small compressor that are used to heat and ventilate the building. The utility room can only be accessed from outside and is not accessible from the rest house. The utility room has a single floor drain that discharges steam condensate through a vitrified clay pipe to an outfall located away from the utility room. The floor drain in the utility room was plugged in 1992. On August 9, 2001, NMED and EPA personnel conducted a tour of the rest house and the utility room. The rest houses are located in the high security, restricted access double-fenced area. SWMU 16-026(e2) is appropriate for NFA under Criterion 2 because it has never managed RCRA hazardous waste and/or constituents.

2-6 SWMU 16-026(f2), Outfall and Associated Drainline:

SWMU 16-026(f2) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 16-026(f2) is an outfall and its associated drainline that serves floor drain of the utility room of HE rest house, TA-16-413. The outfall was constructed to receive steam condensate from equipment used to heat the building associated with the outfall. A rest house is an auxiliary building used for intermediate storage of HE materials before HE was assembled, processed and machined. The rest house is constructed of reinforced concrete and concrete floors. Metal double doors open to an exterior loading dock in the front of the building. The building has no windows and the rear of the building is connected to the HE processing building through an enclosed passageway. The rest house is physically remote from other buildings and is surrounded on three sides by an earthen berm. The rest house has a separate 4-foot by 8-foot utility room equipped with one steam pump and one small compressor that are used to heat and ventilate the building. The utility room can only be accessed from outside and is not accessible from the rest house. The utility room has a single floor drain that discharges steam condensate through a vitrified clay pipe to an outfall located away from the utility room. The floor drain in the utility room was plugged in 1992 and was unplugged in

1997 as a safety precaution to prevent accumulated moisture from shorting out the electrical equipment. On August 9, 2001, NMED and EPA personnel conducted a tour of the rest house and the utility room. The rest houses are located in the high security, restricted access double-fenced area. SWMU 16-026(f2) is appropriate for NFA under Criterion 2 because it has never managed RCRA hazardous waste and/or constituents.

2-7 SWMU 16-026(g2), Outfall and Associated Drainline:

SWMU 16-026(g2) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 16-026(g2) is an outfall and its associated drainline that serves floor drain of the utility room of HE rest house, TA-16-285. The outfall was constructed to receive steam condensate from equipment used to heat the building associated with the outfall. A rest house is an auxiliary building used for intermediate storage of HE materials before HE was assembled, processed and machined. The rest house is constructed of reinforced concrete and concrete floors. Metal double doors open to an exterior loading dock in the front of the building. The building has no windows and the rear of the building is connected to the HE processing building through an enclosed passageway. The rest house is physically remote from other buildings and is surrounded on three sides by an earthen berm. The rest house has a separate 4-foot by 8-foot utility room equipped with one steam pump and one small compressor that are used to heat and ventilate the building. The utility room can only be accessed from outside and is not accessible from the rest house. The utility room has a single floor drain that discharges steam condensate through a vitrified clay pipe to an outfall located away from the utility room. The floor drain in the utility room was plugged in 1992. Small areas of oil stain are present on the floor of the utility room that apparently resulted from small leaks of lubricating oil used for maintenance of compressors. On August 9, 2001, NMED and EPA personnel conducted a tour of the rest house and the utility room. The rest houses are located in the high security, restricted access double-fenced area. SWMU 16-026(g2) is appropriate for NFA under Criterion 2 because it has never managed RCRA hazardous waste and/or constituents.

2-8 SWMU 16-026(h), Outfall and Associated Drainline:

SWMU 16-026(h) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 16-026(h) is an outfall and its associated drainline that serves floor drain of the utility room of HE rest house, TA-16-281. The outfall was constructed to receive steam condensate from equipment used to heat the building associated with the outfall. A rest house is an auxiliary building used for intermediate storage of HE materials before HE was assembled, processed and machined. The rest house is constructed of reinforced concrete and concrete floors. Metal double doors open to an exterior loading dock in the front of the building. The building has no windows and the rear of the building is connected to the HE processing building through an enclosed passageway. The rest house is physically remote from other buildings and is surrounded on three sides by an earthen berm. The rest house has a separate 4-foot by 8-foot utility

room equipped with one steam pump and one small compressor that are used to heat and ventilate the building. The utility room can only be accessed from outside and is not accessible from the rest house. The utility room has a single floor drain that discharges steam condensate through a vitrified clay pipe to an outfall located away from the utility room. The floor drain in the utility room was plugged in 1992. On August 9, 2001, NMED and EPA personnel conducted a tour of the rest house and the utility room. The rest houses are located in the high security, restricted access double-fenced area. SWMU 16-026(h) is appropriate for NFA under Criterion 2 because it has never managed RCRA hazardous waste and/or constituents.

2-9 SWMU 16-026(k), Outfall and Associated Drainline:

SWMU 16-026(k) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 16-026(k) is an outfall and its associated drainline that serves floor drain of the utility room of HE rest house, TA-16-221. The outfall was constructed to receive steam condensate from equipment used to heat the building associated with the outfall. A rest house is an auxiliary building used for intermediate storage of HE materials before HE was assembled, processed and machined. The rest house is constructed of reinforced concrete and concrete floors. Metal double doors open to an exterior loading dock in the front of the building. The building has no windows and the rear of the building is connected to the HE processing building through an enclosed passageway. The rest house is physically remote from other buildings and is surrounded on three sides by an earthen berm. The rest house has a separate 4-feet by 8-feet utility room equipped with one steam pump and one small compressor that are used to heat and ventilate the building. The utility room can only be accessed from outside and is not accessible from the rest house. The utility room has a single floor drain that discharges steam condensate through a vitrified clay pipe to an outfall located away from the utility room. On August 9, 2001, NMED and EPA personnel conducted a tour of the rest house and the utility room. The rest houses are located in the high security, restricted access double-fenced area. SWMU 16-026(k) is appropriate for NFA under Criterion 2 because it has never managed RCRA hazardous waste and/or constituents.

2-10 SWMU 16-026(t), Active Outfall and Associated Drainline:

SWMU 16-026(t) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 16-026(t) is an active storm outfall and its associated drainline from the roof drains of Building TA-16-207. Building TA-16-207 was used as a warehouse until 1993, when it was converted to a nondestructive and noninvasive weapons test facility. Rainwater from 10 roof drains is channeled from the roof to a line that runs through the building and connects to a drainline beneath the concrete floor of the building as shown in the as-built Engineering Drawings of the building. The drainline exits the building and connects to an 8-in. underground storm drainline which discharges approximately at a distance of 80 feet from the building. The outfall and the Building TA-16-207 are located outside the double-fenced HE processing area.

Engineering drawings depict that all roof drains are tied into the building's storm drainline and all floor drains tie into the sanitary sewer line. NMED and EPA personnel conducted a site visit of Building TA-16-207 on August 9, 2001. SWMU 16-026(t) is appropriate for NFA under Criterion 2 because it has never managed RCRA hazardous waste and/or constituents.

2-11 SWMU 16-026(x), Outfall and Associated Drainline:

SWMU 16-026(x) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 16-026(x) is an outfall and its associated drainline that serves floor drain of the utility room of HE rest house, TA-16-437. The outfall was constructed to receive steam condensate from equipment used to heat the building associated with the outfall. A rest house is an auxiliary building used for intermediate storage of HE materials before HE was assembled, processed and machined. The rest house is constructed of reinforced concrete and concrete floors. Metal double doors open to an exterior loading dock in the front of the building. The building has no windows and the rear of the building is connected to the HE processing building through an enclosed passageway. The rest house is physically remote from other buildings and is surrounded on three sides by an earthen berm. The rest house has a separate 4-foot by 8-foot utility room equipped with one steam pump and one small compressor that are used to heat and ventilate the building. The utility room can only be accessed from outside and is not accessible from the rest house. The utility room has a single floor drain that discharges steam condensate through a vitrified clay pipe to an outfall located away from the utility room. The floor drain in the utility room was plugged in 1995 and was unplugged in 1997 as a safety precaution to prevent accumulated moisture from shorting out the electrical equipment. Small areas of oil stain are present on the floor of the utility room that apparently resulted from small leaks of lubricating oil used for maintenance of compressors. On August 9, 2001, NMED and EPA personnel conducted tour of the rest house and the utility room. The rest houses are located in the high security, restricted access double-fenced area. SWMU 16-026(x) is appropriate for NFA under Criterion 2 because it has never managed RCRA hazardous waste and/or constituents.

2-12 SWMU 16-030(b), Outfall and Associated Drainline:

SWMU 16-030(b) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 16-030(b) is an outfall and its associated drainline that serves floor drain of the utility room of HE rest house, TA-16-343. The outfall was constructed to receive steam condensate from equipment used to heat the building associated with the outfall. A rest house is an auxiliary building used for intermediate storage of HE materials before HE was assembled, processed and machined. The rest house is constructed of reinforced concrete and concrete floors. Metal double doors open to an exterior loading dock in the front of the building. The building has no windows and the rear of the building is connected to the HE processing building through an enclosed passageway. The rest house is physically remote from other buildings and is surrounded

on three sides by an earthen berm. The rest house has a separate 4-feet by 8-feet utility room equipped with one steam pump and one small compressor that are used to heat and ventilate the building. The utility room can only be accessed from outside and is not accessible from the rest house. The utility room has a single floor drain that discharges steam condensate through a vitrified clay pipe to an outfall located away from the utility room. The floor drain in the utility room was plugged in 1993. On August 9, 2001, NMED and EPA personnel conducted a tour of the rest house and the utility room. The rest houses are located in the high security, restricted access double-fenced area. SWMU 16-030(b) is appropriate for NFA under Criterion 2 because it has never managed RCRA hazardous waste and/or constituents.

2-13 SWMU 16-030(e), Outfall and Associated Drainline:

SWMU 16-030(e) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 16-030(e) is an outfall and its associated drainline that serves floor drain of the utility room of HE rest house, TA-16-225. The outfall was constructed to receive steam condensate from equipment used to heat the building associated with the outfall. A rest house is an auxiliary building used for intermediate storage of HE materials before HE was assembled, processed and machined. The rest house is constructed of reinforced concrete and concrete floors. Metal double doors open to an exterior loading dock in the front of the building. The building has no windows and the rear of the building is connected to the HE processing building through an enclosed passageway. The rest house is physically remote from other buildings and is surrounded on three sides by an earthen berm. The rest house has a separate 4-feet by 8-feet utility room equipped with one steam pump and one small compressor that are used to heat and ventilate the building. The utility room can only be accessed from outside and is not accessible from the rest house. The utility room has a single floor drain that discharges steam condensate through a vitrified clay pipe to an outfall located away from the utility room. The floor drain in the utility room was plugged in 1993. On August 9, 2001, NMED and EPA personnel conducted a tour of the rest house and the utility room. The rest houses are located in the high security, restricted access double-fenced area. SWMU 16-030(e) is appropriate for NFA under Criterion 2 because it has never managed RCRA hazardous waste and/or constituents.

2-14 SWMU 16-030(f), Outfall and Associated Drainline:

SWMU 16-030(f) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 16-030(f) is an outfall and its associated drainline that serves floor drain of the utility room of HE rest house, TA-16-223. The outfall was constructed to receive steam condensate from equipment used to heat the building associated with the outfall. A rest house is an auxiliary building used for intermediate storage of HE materials before HE was assembled, processed and machined. The rest house is constructed of reinforced concrete and concrete floors. Metal double doors open

to an exterior loading dock in the front of the building. The building has no windows and the rear of the building is connected to the HE processing building through an enclosed passageway. The rest house is physically remote from other buildings and is surrounded on three sides by an earthen berm. The rest house has a separate 4-feet by 8-feet utility room equipped with one steam pump and one small compressor that are used to heat and ventilate the building. The utility room can only be accessed from outside and is not accessible from the rest house. The utility room has a single floor drain that discharges steam condensate through a vitrified clay pipe to an outfall located away from the utility room. On August 9, 2001, NMED and EPA personnel conducted a tour of the rest house and the utility room. The rest houses are located in the high security, restricted access double-fenced area. SWMU 16-030(f) is appropriate for NFA under Criterion 2 because it has never managed RCRA hazardous waste and/or constituents.

2-15 SWMU 20-003(a), Former Firing Site Control Building:

SWMU 20-003(a) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 20-003(a), a former control building TA-20-2, was constructed in 1945 and was located in a technical area that no longer exists. The building was removed in 1948 when TA-20 was decontaminated and decommissioned to build a new access road. The control building was 20 x 10 x 7.5-ft building that was solely used for controlling the detonation of and observing firing tests. No hazardous waste or hazardous constituents were ever managed in the building. The building had wooden walls and an access door it was surrounded by an earthen berm on three sides. The engineering drawings show that there was no plumbing in the building. The former location of TA-20 lies within the current boundaries of TA-53 and TA-72, East Jemez Road runs through the center of former TA-20. NMED and EPA personnel conducted a site visit on August 9, 2001. SWMU 20-003(a) is appropriate for NFA under Criterion 2 because it has never been used to manage RCRA hazardous waste and/or constituents.

2-16 SWMU 55-009, Sumps and Tanks:

SWMU 55-009 was proposed for NFA in a Request for Permit Modification submitted to EPA in March 1995. SWMU 55-009 (structure number 55-263) is an inactive monitoring station that was housed in a concrete-lined pit. It was used to monitor sanitary waste liquids from Buildings 55-3 and 55-4 for radioactivity before they discharged to TA-35 sewage treatment lagoons (prior to 1992), and to the TA-46 Sanitary Waste System Consolidation treatment plant. Building 55-3 is a general support facility and contains a chemistry laboratory and Building 55-4 is the main plutonium-processing facility at TA-55. The monitoring equipment was installed sometime around 1975 at the time when the original TA-55 facilities were constructed. The monitoring equipment was installed as a security measure to prevent the theft of radioactive materials from the TA-55 complex via sewer pipes. However, the equipment never functioned properly and the use was discontinued in 1993. The monitoring equipment was removed in 1993 but the concrete lined pit was left in place. Site inspection showed no evidence of cracking,

staining or leakage. NMED staff inspected the site on September 18, 2001. Radiological screening conducted at that time did not detect any activity above background levels. Samples were collected to determine if there was any radioactive contamination in the pit, no alpha or beta activity above background was detected in any of the samples. SWMU 55-009 is appropriate for NFA under Criterion 2 because it has never been used to manage RCRA hazardous waste and/or constituents.

NFA Criterion 3. The SWMU is not known or suspected of releasing RCRA solid or hazardous wastes and/or constituents to the environment. The term “release” means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous constituents) into the environment.

3-1 SWMU 16-025(e2), Potential Soil Contamination from Former HE Storage Building:
SWMU 16-025(e2) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 16-025(e2) was identified as an area of possible contamination from a former HE storage building (magazine). The magazine, Structure TA-16-106 was a 6 x 6 x 7 feet wood frame building. It was constructed in 1944 for product storage and was removed in 1949. Packaged HE and other materials were stored in these building while awaiting transfer to a processing facility or for off-site transfer. No open or loose HE was stored in this building, no machining or shaping of HE was conducted in this building. Archival search did not produce any documented cases of release of materials stored in the magazine to the environment. The building was removed in preparation for the construction of State Highway 501. The former location of the building currently lies either under State Highway 501 or under disturbed soils adjacent to the road. The soils were disturbed heavily during the construction of highway and it is not possible to precisely locate the footprint of the former building. In addition, during the road construction, several feet of excavated soil and/or base course and asphalt was placed over the area. NMED and EPA personnel conducted a site visit on August 9, 2001. The SWMU 16-025(e2) is appropriate for NFA and removal from the Permit because it is not known or suspected that a release of RCRA solid or hazardous wastes and/or constituents to the environment occurred.

3-2 SWMU 16-025(f2), Potential Soil Contamination from Former HE Storage Building:
SWMU 16-025(f2) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 16-025(f2) was identified as an area of possible contamination from a former HE storage building (magazine). The magazine, Structure TA-16-107 was a 6 x 6 x 7 feet wood frame building. It was constructed in 1944 for product storage and was removed in 1950. Packaged HE and other materials were stored in these building while awaiting transfer to a processing facility or for off-site transfer. No open or loose HE was stored in this building, no machining or shaping of HE was conducted in this building. Archival search did not produce any documented cases of

release of materials stored in the magazine to the environment. The building was removed in preparation for the construction of State Highway 501. The former location of the building currently lies either under State Highway 501 or under disturbed soils adjacent to the road. The soils were disturbed heavily during the construction of highway and it is not possible to precisely locate the footprint of the former building. In addition, during the road construction several feet of excavated soil and/or base course and asphalt was placed over the area. NMED and EPA personnel conducted a site visit on August 9, 2001. The SWMU 16-025(f2) is appropriate for NFA and removal from the Permit because it is not known or suspected that a release of RCRA solid or hazardous wastes and/or constituents to the environment occurred.

- 3-3 SWMU 16-025(h2), Potential Soil Contamination from Former HE Storage Building:** SWMU 16-025(h2) was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU 16-025(h2) was identified as an area of possible contamination from a former HE storage building (magazine). The magazine, Structure TA-16-109 was a 6 x 6 x 7 feet wood frame building. It was constructed in 1944 for product storage and was removed in 1950. Packaged HE and other materials were stored in these building while awaiting transfer to a processing facility or for off-site transfer. No open or loose HE was stored in this building, no machining or shaping of HE was conducted in this building. Archival search did not produce any documented cases of release of materials stored in the magazine to the environment. The building was removed in preparation for the construction of State Highway 501. The former location of the building currently lies either under State Highway 501 or under disturbed soils adjacent to the road. The soils were disturbed heavily during the construction of highway and it is not possible to precisely locate the footprint of the former building. In addition, during the road construction several feet of excavated soil and/or base course and asphalt was placed over the area. NMED and EPA personnel conducted a site visit on August 9, 2001. The SWMU 16-025(h2) is appropriate for NFA and removal from the Permit because it is not known or suspected that a release of RCRA solid or hazardous wastes and/or constituents to the environment occurred.

NFA Criterion 5. The SWMU was characterized or remediated in accordance with applicable state and/or federal regulations, and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use.

- 5-1 SWMU C-08-010, Former Drum Storage Area:** SWMU C-08-010 was proposed for NFA in a Permit Modification Request submitted to NMED in June 2001. SWMU C-08-010 is the location of a former drum storage area. It was located in TA-8 at Anchor Ranch Site West, approximately 100 feet north of Building TA-8-1. The exact date of construction of the drum storage area, Structure TA-8-34 is not known. Nearby, Building TA-8-1 was constructed in 1943 and Building TA-8-8 was constructed in 1944. The structure was removed sometime around July 1947.

The structure was used for storage of drums. The drums may have contained liquids such as oils or solvents, and if the drums had leaked they could have potentially released contaminants to the soil. Based on this assumption, a RCRA Facility Investigation (RFI) was conducted at the site and the report was submitted to NMED in 1996. Soil samples were collected at the site and analyzed for organic chemicals. The analytical results indicated that release had not occurred. NMED and EPA personnel conducted a site visit on August 9, 2001 and found no evidence of stressed vegetation at the site. SWMU C-8-010 is appropriate for NFA under Criterion 5 because the site has been characterized in accordance with applicable state and/or federal regulations, and the available data indicate that there has been no release of hazardous waste and/or constituents to the environment.

5-2 SWMU 21-013(d), Surface Disposal Area:

SWMU 21-013(d) was proposed for NFA in a Permit Modification Request submitted to NMED on August 5, 2005. SWMU 21-013(d), also known as the cold dump, was consolidated with SWMU 21-013(e) to form a consolidated unit 21-013(d)-99. The boundary between the two disposal areas was not clearly discernible, so the sites were investigated simultaneously. SWMU 21-013(d) was used for surface disposal of construction-related debris like rebar, concrete rubble, asphalt, steel and used lumber. The dates of operation of the disposal area are not known. An interview with a former employee, who had managed these disposal areas from 1947 until 1983, indicated that no chemicals, high explosives or radioactive materials were disposed at the site. A Phase I RCRA facility investigation (RFI) was conducted in August 1994 to determine if any contamination had been released to surface and subsurface soils from the disposal area. Although the screening data did not indicate the presence of radioactive or organic contamination, a representative set of surface and near-surface samples were collected for off-site laboratory analysis. These samples were analyzed for target analyte list (TAL) metals, polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs) and semivolatile organic compounds (SVOCs) and radionuclides. Some compounds were detected above background values (BVs) but below soil screening action levels (SALs). In August 1995, a Voluntary Corrective Action (VCA) was conducted at the SWMU to remove surface debris. Confirmatory surface soil samples collected at the site after removal of debris and trash indicated presence of some compounds above background values but below SALs. NMED reviewed the VCA Report and required additional soil samples to be collected and analyzed. The Permittees conducted another VCA for the consolidated SWMU in 2003; debris piles, 22 original sampling locations and 19 new locations were sampled. Several chemicals of potential concern (COPCs) were identified. A human health risk assessment based on a residential exposure was performed and the results indicated that the residual concentrations pose no unacceptable risk to human health. The ecological screening assessment concluded that there was no unacceptable risk to ecological receptors. NMED visited the site on April 6, 2004 and approved the VCA Completion Report on January 18, 2005. SWMU 21-013(d) is appropriate for NFA under Criterion 5 because the site was characterized and remediated

in accordance with state and federal regulations, and the available data indicate that remaining contaminants pose an acceptable level of risk under current and projected future land use.

5-3 SWMU 21-013(e), Surface Disposal Area:

SWMU 21-013(e) was proposed for NFA in a Permit Modification Request submitted to NMED on August 5, 2005. SWMU 21-013(e), located adjacent to SWMU 21-013(d) was consolidated with SWMU 21-013(d) to form a consolidated unit 21-013(d)-99. The boundary between the two disposal areas was not clearly discernible, so the sites were investigated simultaneously. SWMU 21-013(e) was used for surface disposal of building debris such as excess concrete, demolished foundations, fill and asphalt. The dates of operation of the disposal area are not known. An interview with a former employee, who had managed these disposal areas from 1947 until 1983, indicated that no chemicals, high explosives or radioactive materials were disposed at the site. A Phase I RCRA facility investigation (RFI) was conducted in August 1994 to determine if any contamination had been released to surface and subsurface soil from the disposal area. Although the screening data did not indicate the presence of radioactive or organic contamination, a representative set of surface and near-surface samples were collected for off-site laboratory analysis. These samples were analyzed for target analyte list (TAL) metals, polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs) and semivolatile organic compounds (SVOCs) and radionuclides. Some compounds were detected above background values (BVs) but below soil screening action levels (SALs). In August 1995, a Voluntary Corrective Action (VCA) was conducted at the SWMU to remove surface debris. Confirmatory surface soil samples collected at the site after removal of debris and trash indicated presence of some compounds above background values but below SALs. NMED reviewed the VCA Report and required that additional soil samples be collected and analyzed. The Permittees conducted another VCA for the consolidated SWMU 21-013(d)-99 in 2003; debris piles, 22 original sampling locations and 19 new locations were sampled. Several chemicals of potential concern (COPCs) were identified. A human health risk assessment based on a residential exposure was performed and the results indicated that the residual concentrations do not pose unacceptable risk to human health. The ecological screening assessment concluded that there was no unacceptable risk to ecological receptors. NMED visited the site on April 6, 2004 and approved the VCA Completion Report on January 18, 2005. SWMU 21-013(e) is appropriate for NFA under Criterion 5 because the site was characterized and remediated in accordance with state and federal regulations, and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use.

5-4 SWMU 21-024(f), Septic System:

SWMU 21-024(f) was proposed for NFA in a Permit Modification Request submitted to NMED on August 5, 2005. SWMU 21-024(f) is a former septic system that received effluent from Building 21-45, a waste research laboratory, from 1947 to 1954. The septic

system consisted of an inlet pipe, 1000 gallon steel septic tank, outfall pipe and outfall pit. The outfall pit was located on the northern edge of Delta Prime (DP) mesa and drained towards the DP Canyon. Two RFIs conducted in the past (1992 & 1993) indicated the presence of inorganic compounds, organic compounds and radionuclides at the site. Subsequently, a VCA was conducted for SWMU 21-024(f), AOC C-21-015 and AOC 21-030. VCA activities began in July 2001 and were completed in April 2003. AOC C-21-015 is the footprint of Building 21-45 that was removed in 1954. AOC 21-030 is an inactive concrete sump and associated piping that was left in place when Building 21-45 was removed. VCA activities included removal of septic tank and associated lines, concrete sump and outlet line, and collection of soil confirmation samples. Surface and subsurface confirmatory soil samples were collected from the former location of the septic tank and associated lines. Samples were also collected from the outfall slope to determine the nature and extent of contamination from the septic tank outfall, beneath the concrete sump, downgradient of sump, and from the footprint of Building TA 21-45. The samples were analyzed for TAL metals, perchlorate, VOCs and radionuclides. Following the removal of structures and backfilling of the excavations, the site was regraded and grass seed was spread to restore the site. A human health risk assessment based on a residential exposure was performed and the results indicated that the residual concentrations do not pose unacceptable risk to human health. An ecological screening assessment concluded that there was no unacceptable risk to ecological receptors. NMED inspected the site on April 6, 2004 and approved the VCA Completion Report on June 21, 2004. SWMU 21-013(f), AOC C-21-015 and AOC 21-030 are appropriate for NFA under Criterion 5 because the site was characterized and remediated in accordance with state and federal regulations, and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use.

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