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STATEMENT OF BASIS

June 4, 2003

**Notice of Intent to Approve a Permit Modification for No Further Action to Remove Seven 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 seven 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 comprising of approximately 43 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 averaging about 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 University of California. The LANL facility is the site of research and development for 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 Administrative Authority (AA) for this action.

Permittees have previously requested through five submittals the removal of 224 SWMUs from the Module VIII of the Permit. March 27, 1995, submittal requested no further action (NFA) status for 89 SWMUs; September 28, 1995, submittal requested NFA for 59 SWMUs; September 30, 1996, submittal requested NFA for 42 SWMUs; June 2000 submittal requested NFA for 9 units and June 2001 submittal requested NFA for additional 25 SWMUs. NMED reviewed these submittals and removed total of 139 SWMUs from the Module VIII of the Permit. The remaining 85 SWMUs will be the subject of further study and or investigation.

On September 30, 2002, NMED received a permit modification request from the Permittees to remove nine additional SWMUs from Module VIII of the Permit. NMED has reviewed the request and has determined that seven of these SWMUs are appropriate for NFA and removal from the Permit. The remaining two SWMUs need further study and/or investigation.

C. INVESTIGATION RESULTS

During investigation, it was determined that certain sites identified as SWMUs never handled 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 LANL. At this time, NMED has identified seven of these SWMUs as appropriate for NFA, 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 LANL's RCRA Facility Investigation (RFI) Work Plans, Voluntary Corrective Action (VCA) Completion Reports and RFI Reports as referenced in the permit modification request. Additional references are included in Section J, Supporting Documentation.

D. ADMINISTRATIVE RECORD

The administrative record for this proposed action consists of the Permit Modification Request, a Fact Sheet, the Statement of Basis, the Public Notice, the draft Permit that consists of the Proposed Revised Tables A, and B, 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 the Fact Sheet, the Statement of Basis, the Public Notice, the Proposed Revised Tables A, and B, 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 Mr. John Young at (505) 428-2538, or at the address given below. NMED will provide members of the public with up to 80 pages of the Administrative Record free of charge. Thereafter, NMED will charge a copy fee of \$0.25 per page.

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 show no or insignificant release(s) of hazardous wastes to the environment. 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 45-day public comment period.

A request for the permit modification was submitted, as required by the RCRA Permit, to NMED on September 30, 2002. The Permittees held a public meeting on November 14, 2002, from 5:30 p.m. to 7:30 p.m. at the Fuller Lodge (2132 Central Avenue), Los Alamos, New Mexico, during the 60-day public comment period (from October 6, 2002 to December 6, 2002). Nineteen people attended the meeting, including representatives from DOE, LANL, and NMED. NMED responded to the significant comments received during the 60-day comment period.

NMED issued a public notice on **June 4, 2003**, to announce the beginning of a 45-day comment period that will end at **5:00 p.m. on July 21, 2003**. 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. July 21, 2003** will be considered

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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 Young
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, September 30, 2002

NFA Criterion 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.

1-1 SWMU 01-001(m) SEPTIC TANK

SWMU 01-001(m) was identified as Septic Tank 275. The preliminary drawings identified it as a 300-gallon septic tank that serviced Warehouse 13 from 1944-1946. Warehouse 13 was removed in 1954 and the tank was reportedly either abandoned or not located. The tank was not discovered during D&D operations in 1970s. Although the preliminary drawing shows a proposed rest room to be added to the warehouse, an "As Built" engineering drawing indicates that no rest room or plumbing was installed in the warehouse. The SWMU is located on private property that is currently being operated as self-storage business. During an interview with NMED personnel on April 5, 2000, the current property owner indicated that the original floor, foundation and stem walls of the warehouse were used for the construction of the first storage unit. A visual inspection of the storage unit conducted on August 9, 2000, indicated that there were no open or plugged penetrations in the floor, foundation or stem walls and there was no evidence of any water or plumbing to have serviced the building. NMED concurs with Permittees that the septic tank does not exist, the SWMU was proposed for NFA on October 23, 2000 and was approved by NMED on November 29, 2000. SWMU 01-001(m) is appropriate for NFA under Criterion 1 because the site does not exist.

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 00-003 FORMER CONTAINER STORAGE AREA

SWMU 00-003 is a former container storage area located at the eastern end of now non-operational Western Steam Plant. The approximately 100 sq. ft. area was used to store

55-gallon drums containing chemicals used for boiler water treatment. The area was decommissioned in 1987. While operational, some spillage of chemicals occurred at the site. An RFI was conducted at the site in 1997 to determine the presence of contaminants. Some inorganic chemicals and organic chemicals were detected at the site. A VCA was implemented in July 2000. The purpose of VCA activities was to collect samples to define the extent of contamination. Screening risk assessment was conducted and results indicate that residual contamination detected at the site is at concentrations that pose an acceptable level of risk to human or to ecological receptors. NMED conducted a site inspection on July 11, 2000. NMED approved the VCA report on January 30, 2002. SWMU 00-003 is appropriate for NFA under Criterion 5 because the site was characterized and remediated in accordance with state and federal regulations.

5-2 SWMU 00-012 Former Underground tank

SWMU 00-012 is a former underground blow off tank that received blow-down steam and water from the boilers associated with the Western Steam Plant. The tank was made of steel and was approximately 4 feet in diameter by ten feet long. An RFI was conducted for the site in 1997 to determine if any contaminants were present at the site. The results of investigation indicated presence of organic chemicals at the site. In July 2000, a VCA was conducted at the site to remove the blow-off tank and piping. After removal of the tank and piping confirmatory samples were taken beneath the piping and the tank. Analytical results indicated that the residual contamination present at the site does not pose an unacceptable risk to human or to ecological receptors. NMED conducted a site inspection on July 11, 2000. Area of concern (AOC) 00-030 (i) is an inactive septic tank located on DOE property, south of Trinity Drive and east of 35th Street. The tank probably served the West Mesa Hall, dormitories, the post office, officer's lounge, post exchange and apartments. The septic tank outlet drainline discharged to an outfall drainage channel southwest of the septic tank. The tank was also removed as part of a VCA in 1996. Two confirmation samples were collected from beneath the tank and analyzed for organic chemicals, inorganic chemicals, pesticides, PCBs, and radionuclides. Organic and inorganic chemicals were detected; radionuclides were not detected at the site. In July 2000, supplemental sampling and removal of the inlet and outlet line were conducted as part of VCA activities at SWMUs 00-012 and 00-003. Screening risk assessment was conducted and results indicate that residual contamination detected at the site is at concentrations that pose an acceptable level of risk to human or to ecological receptors. SWMU 00-012 and AOC 00-030 (i) are appropriate for NFA under Criterion 5 because the sites were characterized and remediated in accordance with state and federal regulations.

5-3 SWMU 00-028(a) LOS ALAMOS COUNTY GOLF COURSE

SWMU 00-028(a) is a golf course that was irrigated with effluent from the former Central Wastewater treatment Plant from 1948 till approximately 1961 and from Pueblo Wastewater Treatment Plant from 1951 to 1993. Although both treatment plants were

intended to handle sanitary waste, small detectable levels of radioactive and chemical wastes were observed in the effluents. Suspected contaminants included radionuclides, organic chemicals, inorganic chemicals, pesticides and polychlorinated biphenyls (PCBs). An RFI investigation was conducted at the site to determine if any releases of contaminants had occurred at the site. Samples were collected at the site and analyzed for suspected contaminants. A human health screening assessment was conducted for the site that concluded that there was no unacceptable risk from residual contaminants. An ecological screening assessment determined that there was no unacceptable risk to ecological receptors. The RFI report was approved by NMED in a letter dated March 7, 2002. Therefore, SWMU 00-028(a) is appropriate for NFA under Criterion 5.

5-4 SWMU 00-028(b) NORTH MESA ATHLETIC FIELDS

SWMU 00-028(b) consists the North Mesa athletic fields that may have been irrigated with effluent from the Pueblo Canyon wastewater treatment plant. The wastewater treatment plant managed sanitary waste but apparently received radioactive and laboratory chemicals. Suspected contaminants included radionuclides, organic chemicals, inorganic chemicals, pesticides and PCBs. An RFI was conducted at the site in 1996, samples were collected at the site and analyzed for suspected contaminants. A human health screening assessment was conducted for the site that concluded that there was no unacceptable risk from residual contaminants. An ecological screening assessment determined that there was no unacceptable risk to ecological receptors. The RFI report was approved by NMED in a letter dated March 7, 2002. Therefore, SWMU 00-028(b) is appropriate for NFA under Criterion 5.

5-5 SWMU 54-007(c) INACTIVE SEPTIC SYSTEM

SWMU 54-007(c) is comprised of a fiberglass septic tank, a drainline and a drainfield formed by three parallel lines of slotted PVC pipe, approximately 4 feet below ground surface. The septic system was constructed in late 1980s and was decommissioned in 1992. Remediation of the site involved removal of two septic tanks. A second septic system, AOC 54-007(e) located adjacent to SWMU 54-007(c) was also removed during the remediation, drainfield for both septic tanks was interconnected. A voluntary corrective action (VCA) was implemented at the site in 2000/2001. The contents of both tanks were analyzed for organic chemicals, inorganic chemicals, pesticides, PCBs and radionuclides before removal. Inlet and outlet drainlines were plugged and left in place. The confirmatory samples were collected from the drainfield and from the footprint of the septic tanks. The VCA completion report was approved by NMED on June 20, 2002. The human health and ecological screening assessments were carried out for the site that demonstrated that residual contamination at the site poses no unacceptable risk to human or ecological receptors. Therefore, SWMU 54-007(c) is appropriate for NFA under Criterion 5.

5-6 SWMU 73-005 SURFACE DISPOSAL AREA

SWMU 73-005 consists of a surface disposal area and cylindrical steel septic tank located near the north edge of DP Canyon, the area was formerly known as Contractors' Row. The area of SWMU 73-005 is roughly 400 feet long and 200 ft wide, extending from near State Road NM 502 right-of-way fence line to near the north rim of DP Canyon. The area contains scattered concentrations of debris including concrete, asphalt, metal shavings, and other non-hazardous construction and demolition debris. AOC 73-007 consists of a cylindrical steel septic tank, and two cast-iron riser pipes is located within the boundary of SWMU 73-005, and was discovered during field reconnaissance visit in 1996. During a 1996 site visit conduct by the Laboratory, six unlined pits, referred to as AOCs C-73-005(a-f), were discovered. The six unlined pits of varying dimensions were all excavated into the tuff and all located within the boundary of the Contractors' Row area. Based on the physical appearance of the pits, it is believed the pits received sanitary wastes from Contractors' Row. No historical information regarding construction, engineered drawings, could be located by the Laboratory. The SWMU (73-005), and seven AOCs [73-007, and C-73-005(a through f)] were consolidated into one unit to facilitate investigations. An RFI investigation was conducted at the site from 1996-1999 in several phases. Samples were first collected from the unlined pits in June 1996. The septic tank (73-007) was removed as part of a voluntary corrective action in June 1996. In 1999 another septic tank (73-005) was discovered and subsequently removed and investigated. Samples collected at the site were analyzed for inorganic chemicals, organic chemicals, PCBs/pesticides, and radionuclides. The NMED DOE Oversight Bureau collected five soil and tuff samples from the site for off-site fixed laboratory analysis from locations where activities were known to have occurred. Results of the NMED data were added to the Laboratory RFI data and presented in the final RFI Report. The RFI report was approved by NMED on March 28, 2002. The human health and ecological screening assessments were carried out for the site that demonstrated that residual contamination at the site poses no unacceptable risk to human or ecological receptors. Therefore, SWMU 73-005 is appropriate for NFA under Criterion 5.

J. SUPPORTING DOCUMENTATION

Ahlquist, A. J., Stoker, A. K., and Trocki, L.K., December 1977. "Radiological Survey and Decontamination of the Former Main Technical Area (TA)-1 at Los Alamos, New Mexico". Los Alamos National Laboratory Report LA-6887, Los Alamos, New Mexico.

LANL (Los Alamos National Laboratory), May 1992. "RFI Work Plan for Operable Unit 1078," Los Alamos National Laboratory Report LA-UR-92-838, Los Alamos, New Mexico.

LANL (Los Alamos National Laboratory), May 1992. "RFI Work Plan for Operable Unit 1148," Los Alamos National Laboratory Report LA-UR-92-855, Los Alamos, New Mexico.

LANL (Los Alamos National Laboratory), June 1994. "RFI Work Plan for Operable Unit 1071," Los Alamos National Laboratory Report LA-UR-92-810, Los Alamos, New Mexico.

Environmental Restoration Project, July 1996. "RFI Report for Potential Release Sites at 0-028(a,b), Septic Systems, Field Unit 1," Los Alamos National Laboratory Report LA-UR-96-2421, Los Alamos, New Mexico.

Environmental Restoration Project, September 1996. "Voluntary Corrective Action Report for Potential Release Sites 73-004(a,b), 73-007, C-73-005(a-f), Field Unit 1, May 1996," Los Alamos National Laboratory Report LA-UR-96-3350, Los Alamos, New Mexico.

New Mexico Environment Department, Hazardous and Radioactive Materials Bureau, February 4, 1997. "Notice of Deficiency, RCRA Facility Investigation Report, Technical Area 1, Potential Release Sites 0-028(a and b), Los Alamos National Laboratory, NM0890010515."

Los Alamos National Laboratory, March 24, 1997. "Response to the NOD for TA 0, PRSs 0-028(a,b) RFI Report (Former Operable Unit 1071)," Los Alamos National Laboratory EM/ER:97-086, Los Alamos, New Mexico.

New Mexico Environment Department, Hazardous and Radioactive Materials Bureau, October 1, 1997. "Notice of Deficiency, Response to Notice of Deficiency, 0-028(a-b) RCRA Facility Investigation Report, Los Alamos National Laboratory, NM0890010515."

Environmental Restoration Project, September 1997. "RFI Report for Potential Release Sites 0-003 and 0-012, Field Unit 1," Los Alamos National Laboratory Report LA-UR-97-3828, Los Alamos, New Mexico.

Environmental Restoration Project, November 5, 1997. "Response to the NOD for the RFI Report for PRSs 0-028(a,b) in TA-0 (Former OU 1071)," Los Alamos National Laboratory EM/ER:97-436, Los Alamos, New Mexico.

Environmental Restoration Project, November 30, 1998. "Sampling and Analysis Plan for SWMU Group 73-2; 73-003, 73-004(a), 73-004(b), 73-005, 73-006, 73-007, C-73-005(a through f)," Los Alamos National Laboratory Report LA-UR-98-4076, Los Alamos, New Mexico.

Environmental Restoration Project, January 2000, "Voluntary Corrective Action Plan for Potential Release Sites 0-003, 0-012, and 0-030 (i)," Los Alamos National Laboratory Report, LA-UR-99-5671-3350, Los Alamos, New Mexico.

Environmental Restoration Project, June 2000, "LAAO VCA Plan, additional sampling for PRS 0-003, Los Alamos National Laboratory report record of communication to Vickie Maranville (NMED) from Terry Rust (LANL)," Los Alamos, New Mexico.

Environmental Restoration Project, July 2000. "RFI Report for Consolidated PRS 73-005-99," Los Alamos National Laboratory Report LA-UR-00-1672, Los Alamos, New Mexico.

Environmental Restoration Project, October 2000. "Submittal of Voluntary Corrective Action (VCA) Plan for Potential Release Site (PRS) 54-007(c)-99," Los Alamos National Laboratory Report ER2000-0590, Los Alamos, New Mexico.

Environmental Restoration Project, October 23, 2000. "Additional Information for Potential Release Site (PRS) 01-001(m), Septic Tank 275, on Rollin Jones Property" Los Alamos National Laboratory Report ER2000-0581, Los Alamos, New Mexico.

New Mexico Environment Department, Hazardous Waste Bureau, November 29, 2000. "Approval of No Further Action for Potential Release Sites 01-001(m), Los Alamos National Laboratory, NM0890010515 HWB-LANL-01-014."

New Mexico Environment Department, Hazardous Waste Bureau, January 2001, "Memo to File: Comments for RFI Report for Consolidated PRS 73-005-99 Los Alamos National Laboratory, NMED Task Number HWB-LANL-00-013."

Environmental Restoration Project, February 2001, "Record of Communication LANL Response to NMED Comments for 73-005-99."

Environmental Restoration Project, September 2001. " Voluntary Corrective Action Completion Report for PRS 54-007(c)-99" Los Alamos National Laboratory Report LA-UR-01-5311, Los Alamos, New Mexico.

New Mexico Environment Department, Hazardous Waste Bureau, October 22, 2001, "Request for Supplemental Information Response to the 2nd Notice of Deficiency for Potential Release Sites 0-028(a,b) RFI Report, Los Alamos National Laboratory, NM0890010515."

New Mexico Environment Department, Hazardous Waste Bureau, November 27, 2001. "Extension Request Approval for Supplemental Information (RSI) Response for 2nd Notice of Deficiency (NOD) for Potential Release Sites (PRSS) 00-028(a,b) RFI Report Los Alamos National Laboratory, EPA ID #NM0890010515."

New Mexico Environment Department, Hazardous Waste Bureau, December 10, 2001, "Request for Supplemental Information for the VCA Completion Report for PRS 54-007(c)-99, Los Alamos National Laboratory, NM0890010515 HWB-LANL-01-017."

Environmental Restoration Project, December 19, 2001, "Submittal of Response to Request for Supplemental Information (RSI), Response to the 2nd Notice of Deficiency (NOD) for Potential Release Sites (PRSs) 00-028(a,b) RCRA Facilities Investigation Report, Los Alamos National Laboratory (LANL), NM0890010515, HWB-LANL-01-025," ER2001-1014, Los Alamos, New Mexico.

Environmental Restoration Project, September 30, 2002. "Los Alamos National Laboratory Permit Modification Request, September 2002," Los Alamos National Laboratory Report ER2002-0683, Los Alamos, New Mexico.

Environmental Restoration Project, February 8, 2002, "Submittal of Response to the Supplemental Information (RSI) Request for the Voluntary Corrective Action (VCA) Report for Potential Release Site (PRS) 54-007(c)-99," Los Alamos National Laboratory ER2002-0106, Los Alamos, New Mexico.

Environmental Restoration Project, February 2002. "Voluntary Corrective Action Completion Report for PRS 54-007(c)-99 Revision 1" Los Alamos National Laboratory Report LA-UR-02-0635, Los Alamos, New Mexico.

New Mexico Environment Department, Hazardous Waste Bureau, March 7, 2002. "Approval of the RFI Report for Potential Release Sites 0-028(a,b), Los Alamos National Laboratory, NM0890010515 HWB-LANL-01-025."

New Mexico Environment Department, Hazardous Waste Bureau, May 31, 2002. "Resolution of Comments on Revision 1 of the Voluntary Corrective Action (VCA) Completion Report for Potential Release Site (PRS) 54-007(c)-99."

New Mexico Environment Department, Hazardous Waste Bureau, June 20, 2002. "Approval of the Voluntary Corrective Action Report (VCA) for Potential Release Sites (PRS) 54-007(c)-99, Los Alamos National Laboratory, NM0890010515 HWB-LANL-01-017."