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Sandia National Laboratories

Sandia National Laboratories/New Mexico Long-Term Environmental Stewardship Program

INSTITUTIONAL CONTROL SITE INSPECTION ANNUAL REPORT FISCAL YEAR 2010

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United States Department of Energy
Sandia Site Office

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EXECUTIVE SUMMARY

Annual inspections of Institutional controls were conducted during Fiscal Year (FY) 2010 as part of the Long-Term Environmental Stewardship (LTES) Program at Sandia National Laboratories (SNL) (SNL 2009a). The inspections were performed according to the Sandia National Laboratories, New Mexico (SNL/NM) the *Long Term Stewardship (LTS)/LTES IC Strategy Plan* (SNL 2010), and Field Operating Procedure (FOP), *LTES Site Posting and Site Inspection of Physical ICs*, FOP 08-14 (SNL 2009b).

Thirty-two sites were inspected under the Institutional Control program during FY 2010. Inspection results are presented in this report, which includes maintenance issues that were identified during the process. The inspection checklists and related field maps for each site are retained in the working files. This document was prepared in accordance with SNL/NM LTS/LTES Institutional Controls Strategy Plan (SNL 2010), U.S. Department of Energy (DOE) Policy 454.1 (DOE 2003) and related guidance (DOE 2005) for ICs. The DOE policy recognizes the wide range of ICs implemented throughout the DOE complex.

No major issues or findings were identified that would affect current or future ICs at any of the sites inspected. The primary maintenance issues resulting from the FY 2010 IC site inspections involved installing LTES signs where required and removing ER signs that no longer require posting. Thirty-one additional ER legacy sites are pending in the regulatory permit modification process which is expected to be completed during Fiscal Year (FY) 2011. Once the NMED has modified the permit to indicate any corrective action is complete at these sites, ICs will be implemented, if required, as part of the LTS/LTES IC Program.

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ACRONYMS AND ABBREVIATIONS

CAC	corrective action complete
CAMU	Corrective Action Management Unit
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
COC	constituent of concern
CWL	Chemical Waste Landfill
DOE	U.S. Department of Energy
DSS	drain and septic system
EMS	Environmental Management System
ER	Environmental Restoration
EPA	U.S. Environmental Protection Agency
ES&H	environment, safety, and health
FOP	Field Operating Procedure
FY	Fiscal Year
IC	institutional control
LTES	Long-Term Environmental Stewardship
LTMMP	long-term monitoring and maintenance plan
LTS	long-term stewardship
MWL	Mixed Waste Landfill
NMED	New Mexico Environment Department
PCCP	post-closure care permit
RCRA	Resource Conservation and Recovery Act
Sandia	Sandia Corporation
SNL	Sandia National Laboratories
SNL/NM	Sandia National Laboratories, New Mexico
SWMU	Solid Waste Management Unit
UST	underground storage tank

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1.0 INTRODUCTION

The Sandia National Laboratories (SNL/NM) Long-Term Environmental Stewardship (LTES) Program is responsible for providing corporate-wide processes to minimize adverse environmental impacts from Sandia Corporation (Sandia) operations at SNL/NM, including new, active, and legacy sites. The *LTES Program Plan* (SNL 2009a) outlines the general program activities and serves as the basis for overall program planning and implementation of the Long-Term Stewardship (LTS) activities. The *LTES Program Plan* was developed and is aligned according to the SNL/NM *Corporate Quality Assurance Program* (SNL 2003).

For the Environmental Restoration (ER) legacy contaminated sites, LTS is defined as "the physical controls, institutions, information, monitoring activities, and other mechanisms necessary to ensure protection of people and the environment at sites where the U.S. Department of Energy (DOE) has completed cleanup (e.g., landfill covers, remedial actions, removal actions, and facility stabilization). LTS at SNL/NM includes continued mitigation of risk from residual hazardous and radioactive contaminants still present at completed ER Project sites, as well as compliance with regulatory and DOE requirements to confirm protection of human health and the environment" (SNL 2009a). The implementation of LTS activities include using land-use controls, monitoring, maintenance, and information management.

ER legacy site responsibility is transferred to LTS once the site has completed the New Mexico Environment Department (NMED) regulatory process and classified by the NMED as being "Corrective Action Complete" (CAC). SNL/NM performs LTS at legacy sites to mitigate risk from residual hazardous and radioactive contaminants as well as for compliance with DOE directives and regulatory requirements to confirm protection of human health and the environment. LTS inspections are necessary at some sites to ensure residual constituents do not migrate from the controlled area and threaten human health and the environment.

SNL/NM LTES sites requiring institutional controls (IC) not only consist of the ER Project legacy sites, but include the Chemical Waste Landfill (CWL), the Corrective Action Management Unit (CAMU), closed underground storage tanks (UST), inactive drain and septic systems (DSS), and new sites when they meet the LTES requirements.

In the context of the SNL/NM LTES Program, ICs are implemented to achieve the following objectives:

- Appropriately limit access to, or uses of, land, facilities, or other real and personal properties, where applicable
- Protect the environment, including cultural and natural resources
- Maintain the physical safety and security of SNL/NM facilities where necessary
- Prevent or limit inadvertent human and environmental exposure to residual contaminants and other hazards
- Integrate IC monitoring and enforcement with the site-wide Environmental Management System (EMS).

Physical ICs are implemented when residual materials or constituents of concern (COCs) on site contain concentrations that limit activities that can safely take place at the site (i.e., the site cannot support unlimited use and unrestricted exposure). In general, physical ICs are widely used mechanisms for limiting inappropriate uses of land or facilities achieved by posting warning signs, installing fences, controlling the use of the land, or any combination of these.

Administrative ICs are established at sites that can support unlimited use and unrestrictive exposure. Information about these sites are maintained in a database for future use and tracking purposes.

2.0 SCOPE OF ACTIVITIES

ICs have been implemented at the CAMU, the CWL, the Mixed Waste Landfill (MWL), and all legacy ER Project sites that have successfully completed the New Mexico Environment Department (NMED) hazardous waste facility permit modification process (NMED 1997). At a minimum, records for all completed sites are maintained in the IC tracking database regardless of their regulatory status. This ensures accountability for all sites and their relevant regulatory information. More rigorous ICs are in place for those sites that have controls implemented and maintained as a requirement of regulatory approval (fencing, sign posting, etc.). All IC information is recorded and maintained in an IC tracking database for internal SNL/NM use only.

The IC inspection activities completed during Fiscal Year (FY) 2010 were performed in accordance with procedures outlined in the SNL/NM *LTES Program Plan* (SNL 2009a), *Long-Term Stewardship/Long Term Environmental Stewardship Institutional Controls Strategy Plan* (SNL 2010) and Field Operating Procedure (FOP) 08-14, *LTES Site Posting and Site Inspection of Physical ICs* (SNL 2009b). Thirty-two sites were inspected in the spring of 2010. The majority of these sites were ER legacy sites. Figure 1 presents a map identifying the site locations that were inspected in 2010. .

For the sites identified as requiring annual inspections in 2010, each must have met one or more of the following criteria:

- Site has been approved by the NMED as Corrective Action Complete (CAC) via completed permit modification process.
- NMED has specified in the Resource Conservation and Recovery Act (RCRA) Permit that controls are required.
- Site has physical access controls requiring fencing, signs (or both).
- Site has regulatory requirements for control of land use.
- Site has been identified under SNL/NM corporate control requirements and methodology for material management; environment, safety, and health (ES&H); or residual radiological concerns.
- Site has been identified as requiring follow-up inspections based on the previous year's inspection results.

Sites that were identified by the NMED as requiring controls may need to have access controls in the form of signs, fencing, or other physical barriers. All forms of physical ICs are inspected

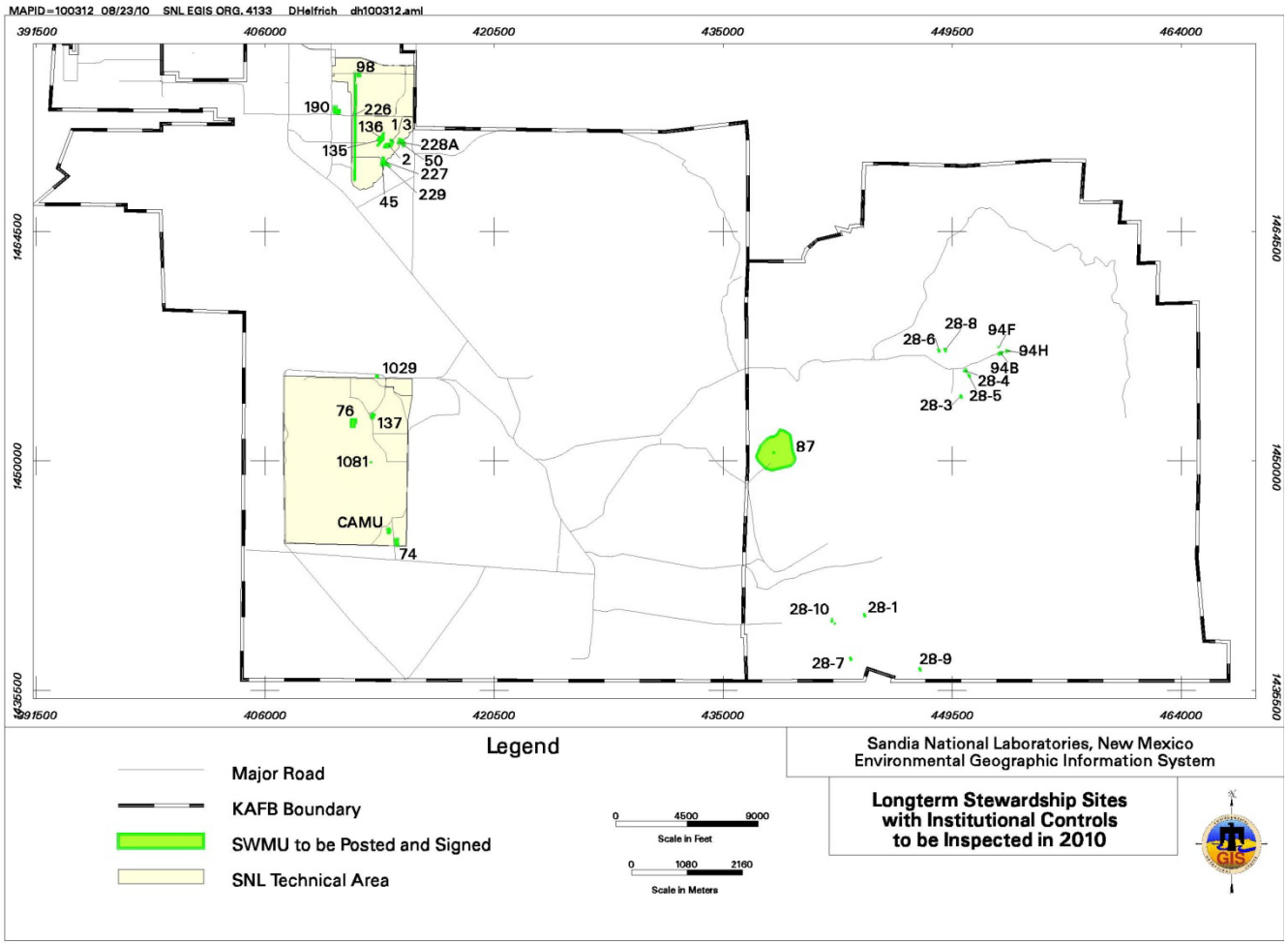

Figure 1
SNL/NM Institutional Control Locations Inspected in 2010

to monitor the integrity of the control measures.

The list of sites included in the 2010 inspection is presented in Table 1, which also provides the inspection dates, inspection results, and maintenance required for each site. Section 3.0 presents the regulatory framework for ICs, and Section 4.0 discusses the IC inspection methodology. The results of the inspections and maintenance issues identified are discussed in Section 5.0. Section 6.0 presents conclusions based on the 2010 IC inspections of LTES sites. References cited are listed in Section 7.0.

3.0 INSTITUTIONAL CONTROL REGULATORY FRAMEWORK

All sites have, at a minimum, administrative ICs once they are transferred into the LTES/LTS program. Sites with administrative ICs are accounted for in the IC tracking database. For each site, the tracked information includes site name, location, map, IC category (e.g., regulatory, corporate, or both), inspection frequency (if any), and the ICs in place. The database currently resides on the internal EMS shared drive at SNL/NM and is updated as site information changes.

At SNL/NM, ICs follow requirements, guidance and policies set forth by the DOE, U.S. Environmental Protection Agency (EPA 2000), NMED, and SNL/NM corporate guidelines for sites subject to RCRA (DOE 2000).

The DOE directive documents provide flexible processes for the identification, application, maintenance, and enforcement of ICs in the broader context of environmental protection. DOE directives have been adopted by the LTS/LTES IC Program and include the following:

- *Institutional Controls in RCRA & CERCLA Response Actions* (DOE 2000)
- *Use of Institutional Controls,* DOE Policy 454.1 (DOE 2003)
- *Institutional Controls, Implementation Guide for Use with DOE P 454.1, Use of Institutional Controls* (DOE 2005)

Table 1
LTES IC Inspection Results and Maintenance Issues
Fiscal Year 2010

Site Number	2010 IC Inspection Requirement	IC Type	Inspection Completed	Inspection Results/ Maintenance Required
1 and 3	Annual	Regulatory CAC with controls	3/31/2010	Removal of all signs that are not LTES signs
2	Annual	Regulatory CAC with controls	3/31/2010	Remove yellow radiological signs
28-1	Annual	ES&H concerns (safety)	4/30/2010	Site located on non-SNL/NM property; future inspections needed;
28-3	Annual	ES&H concerns (safety)	4/26/2010	Site located on non-SNL/NM property; no future inspections needed; track in IC database only
28-4	Annual	ES&H concerns (safety)	4/26/2010	Site located on non-SNL/NM property; future inspections needed;
28-5	Annual	ES&H concerns (safety)	4/26/2010	Site located on non-SNL/NM property; no future inspections needed; track in IC database only
28-6	Annual	ES&H concerns (safety)	4/26/2010	Site located on non-SNL/NM property; no future inspections needed; track in IC database only
28-7	Annual	ES&H concerns (safety)	4/30/2010	Site located on non-SNL/NM property; no future inspections needed; track in IC database only
28-8	Annual	ES&H concerns (safety)	4/26/2010	Site located on non-SNL/NM property; no future inspections needed; track in IC database only
28-9	Annual	ES&H concerns (safety)	4/30/2010	Site located on non-SNL/NM property; no future inspections needed; track in IC database only
28-10	Annual	ES&H concerns (safety)	4/30/2010	Site located on non-SNL/NM property; no future inspections needed; track in IC database only
45	Annual	Regulatory CAC with controls	4/8/2010	Replace ER sign with LTES sign
50	As needed	ES&H concern (erosion)	3/31/2010; 4/14/2010	No erosion concern. Site to be tracked in IC database only. Develop plan for removing structures
61A	Annual	Material Management concern	NA	Structures removed before inspection; recommendation to discontinue annual inspections; track in IC database only; remove site signs
61C	Annual	Material Management concern	NA	Structures removed before inspection; recommendation to discontinue annual inspections; track in IC database only; remove site signs.
74 (CWL)	Per Closure Plan	Material Management concern	6/23/2010	“Danger” signs in need of repair/ replacement

Refer to footnotes at end of table.

Table 1 (Concluded)
LTES IC Inspection Results and Maintenance Issues
Fiscal Year 2010

Site Number	2010 IC Inspection Requirement	IC Type	Inspection Completed	Inspection Results/ Maintenance Required
76 (MWL)	Per Draft LTMMP	Material Management concern	6/23/2010	No maintenance required; LTES signs need to be installed
87	Annual	Regulatory CAC with controls	6/10/2010	Replace existing ER signs with LTES signs
94B	Annual	Regulatory CAC with controls	4/24/2010	LTES signs to be installed
94F	Annual	Regulatory CAC with controls	4/24/2010	LTES signs to be installed
94H	Annual	Regulatory CAC with controls	4/24/2010	LTES signs to be installed
98	Annual	Regulatory CAC with controls	7/2/2010	No surface disturbance; current activities pose no IC interference. Signage under negotiation.
135	Annual	Regulatory CAC with controls	3/31/2010	No IC issues or maintenance needed
136	Annual	Regulatory CAC with controls	3/31/2010	Sign post needs to be removed ("ER Site 44")
137	Annual	Regulatory CAC with controls	4/8/2010	LTES signs to be installed
190	Annual	Regulatory CAC with controls	3/31/2010	No maintenance required
227	Annual	Regulatory CAC with controls	4/8/2010	Some minor erosion up the steep hillside; SWPP measuring device to be removed at bottom of site
228	as needed	ES&H concern (erosion)	3/31/2010; 4/14/2010	None. No erosion concern; site to be tracked in IC database only
229	Annual	Regulatory CAC with controls	4/8/2010	Minor erosion on hill slope; no maintenance required
1029	Annual	Regulatory CAC with controls	4/8/2010	Install LTES signs and remove "ER 1096" signs
1081	Annual	Regulatory CAC with controls	4/8/2010	LTES signs to be installed
CAMU	Quarterly per post-closure care permit	Regulatory	3/09/2010	Fence strand tightening and tumbleweed removal identified

CAC = Corrective Action Complete.
CAMU = Corrective Action Management Unit.
CWL = Chemical Waste Landfill.
ER = Environmental Restoration.
ES&H = Environment, safety, and health.
IC = Institutional Control.
LTES = Long-Term Environmental Stewardship.
LTMMP = Long-Term Monitoring and Maintenance Plan.
MWL = Mixed Waste Landfill.
NA = Not applicable.
SNL = Sandia National Laboratories.
SWPP = Storm Water Protection Plan.

Environmental regulatory requirements are prescribed by the NMED for hazardous constituents and by the DOE for radiological constituents. The NMED requires that Sandia maintain ICs at certain sites at SNL/NM under its RCRA Permit. These sites are listed in the Module IV of RCRA Permit NM5890110518-1 (the Hazardous and Solid Waste Amendments [HSWA] Module) and are referred to as "CAC with controls" (NMED 2008). The DOE currently has not required ICs at any SNL/NM sites due to radiological concerns.

There are site-specific access control and inspection requirements established through current regulatory documents, .i.e., permits or plans, for the CWL, the CAMU, and the MWL. Additional requirements are established in the Post-closure Care Permit (PCCP) for the CWL that was issued in October 2009 but it will not take effect until closure is determined complete by NMED (NMED, 2009a). Requirements for the CAMU are established through the Closure Plan in the RCRA Permit (NMED 2009b). Requirements for the MWL are outlined in the draft long-term monitoring and maintenance plan (LTMMP).

The ER Project legacy sites that are approved as "CAC without controls" are evaluated for implementation of what is referred to as "corporate controls" due to being in response to internal Sandia requirements. If the ER Project legacy site meets one or more of the following criteria, that site will have corporate controls implemented:

- **ES&H Concerns.** Several ER Project legacy locations may pose ES&H concerns primarily due to worker safety issues. For the most part, these sites have been approved by the NMED as CAC without controls based on remediation results that meet human health and ecological risks assessment criteria.

  Material Management Concerns. There are numerous locations at SNL/NM where residual, on-site materials, either surface or subsurface, have been left in place. These sites will be tracked by the SNL/NM LTES IC Program to ensure that future site users properly manage these on-site materials. ER Project legacy DSS, USTs and other structures that have not been physically removed (i.e., the abandoned septic systems, storage tanks remain on site) are examples of sites in this category.

- **Radiological Concerns.** Several locations at SNL/NM either have or have the potential for residual radiological contamination to be present and/or radiological materials to be left on site. Some are ER Project legacy sites identified as having radiological COCs have had the required risk assessment completed. However, for radiological concerns, no federal (EPA or DOE) IC requirement is established; therefore, corporate controls are instituted as a best management practice. Section 4.2.1 of the *LTES IC Strategy Plan* presents a detailed description of the radiological IC guidelines (SNL 2010).

Corporate IC implementation could include one or more of the following controls:

- **Sign and Post.** Some of the IC sites with corporate controls will have signs posted in locations that are visible using common ingress and egress routes (Section 6.0).

- **Site Inspections.** Some of the sites shall be inspected, with the schedule determined on a site-by-site basis.

- **Land-Use Maintenance.** Some IC sites with corporate controls could require land-use restrictions that would limit use of the site to industrial land uses activities.

The *LTS/LTES IC Strategy Plan* presents more specific information regarding the SNL/NM implementation of DOE, EPA, and Sandia IC requirements, guidance and policies (SNL 2010).

4.0 INSTITUTIONAL CONTROL INSPECTION METHODOLOGY

The IC Task Leader is responsible for performing inspections of most of the sites (except at the CWL and CAMU) or delegating the inspection responsibility to alternate qualified personnel. Inspection frequency is site-specific depending on the type of IC, the type of site (DSS, UST, etc.), and, possibly, the location of the site. The schedule of inspections is determined by each site's requirement and is maintained in the SNL/NM IC tracking database. Annual inspections are scheduled during each fiscal year, and coordination with field personnel is necessary. Sample inspection sheets and procedures are provided in SNL/NM FOP 08-14, *LTES Site Posting and Site Inspection of Physical ICs* (SNL 2009b). Required maintenance identified during the inspections is handled in a timely manner, and re-inspections are performed as needed. All inspections and maintenance activities are documented using the IC tracking database, and all inspection reports and checklists are submitted to the Customer Funded Records Center for record retention and future retrieval.

Table 1 lists the sites that were inspected in FY 2010. Currently, 31 additional ER Project legacy sites have not transferred to LTS, but will be added to the inspection list when the sites are determined to be CAC with controls through the permit modification process and responsibility has transferred to LTS. Table 1 shows the results of the 2010 inspections discussed in Section 5.0.

5.0 INSTITUTIONAL CONTROL INSPECTION RESULTS

5.1 Mine Sites

Sites 28-1 and 28-3 through 28-10 are known as the mine sites and are designated as having corporate controls. It was decided to inspect all the mine sites during the 2010 inspections. Site 28-1 has netting across the mine opening, and Site 28-4 has a fence and gate surrounding its open mine shaft. These mine sites are located on land that is not permitted to SNL/NM, and

future inspections will be required, but the interval of future inspections is yet to be determined. One remaining mine site (28-2) has not completed the permit modification process and therefore is not addressed in this report. All remaining mine sites require administrative controls only.

5.2 Material Management Sites

Sites 61A and 61C were included in the inspection list due to the historical structures left on site after remediation (material management concerns). Sometime before the 2010 inspections, the school house and other structures were removed. Future requirements at these sites will be administrative ICs only, and will be tracked in the IC database. Future inspections are not necessary.

5.3 Chemical Waste Landfill

The CWL (also identified as ER Site 74) is in the final stages of closure. Until closure is complete, Sandia continues to inspect, track, and post signage at the CWL in accordance with the requirements of the Closure Plan.

The inspections were conducted and documented. No unusual findings were identified; however, warning signs at the CWL will need to be replaced as two of them have blown off the fence and others are rusted. LTES signs will be posted.

5.4 Corrective Action Management U

The CAMU was closed in 2003 and post-closure care has been conducted in accordance with the post-closure requirements in the Closure Plan in the RCRA Permit.

The CAMU has been inspected on a quarterly basis since February 2003. The inspections are completed by a member of the Environmental Programs and Assurance Organization (Department 4133). 2010 maintenance identified includes tightening the bottom strand of fence on east side of the south gate and the west side of the cell, as well as tumbleweed removal from the entire site. These items were taken care of before the next quarterly inspection.

5.5 Mixed Waste Landfill

DOE and Sandia have submitted all documentation on the completion of corrective action at the MWL (ER Site 76), and the Long-Term Monitoring and Maintenance Plan (LTMMP) to the NMED. Until NMED deems the corrective action complete and approves the LTMMP, the MWL will be inspected using a checklist similar to the one used for the CWL.

During 2010, no unusual findings were identified at the MWL. LTES signs will be posted along the fence.

5.6 Drain and Septic System Sites

Sites 48, 96, 135, 136, 137, 227, 229, 1029, and 1081 are the DSS sites that were identified for inspection in 2010. ER sites 48 and 96 are very long storm drain systems that cannot be effectively inspected and signs cannot be posted. The outfall of Site 48 is a separate DSS site, Site 229, and was inspected in 2010, as discussed below.

ER Sites 135 and 136 are in close proximity and were inspected during the same outing. Old ER signs were removed, and LTES signs posted at both sites. This was the only maintenance item identified at the two sites.

Site 137 is another DSS site that was inspected; LTES signs have been placed at this site. Many manholes and sewer lines are present at the site, but do not represent an IC issue.

ER Sites 227 and 229 are a pair of inactive Technical Area II wastewater outfalls for the DSS ER Site 48, High Explosive Drain System. The outfalls are located on the Tijeras Arroyo bank that is undergoing natural erosion. During the inspections of these two sites, the erosion occurring did not appear to be affecting the sites and/or the ICs that are implemented (signs and postings). A storm water prevention device was observed at the bottom of Site 227, which needs to be removed but is not affecting the ICs implemented at the site. No other maintenance issues were identified at either site.

DSS Sites 1029 and 1081 were inspected, and no IC issues or concerns were discovered. Both sites had LTES signs installed, and old ER signs from an adjacent site (Site 1096) were removed.

5.7 ER Project Legacy Sites

ER Sites 50 and 228 are part of the Centrifuge Site. Site 50 is the Centrifuge Site and Site 228A/B are the Centrifuge Dump Sites. In the 2009 SNL/NM IC inspection report, erosion at Sites 50 and 228A was identified as a potential concern. Both of these sites were closed by the NMED as CAC without controls. Because the Centrifuge Site still has the centrifuge structure on it, the concern was that the erosion might eventually affect the site and put the structures at risk for collapse. The Centrifuge Dump Site (Site 228A) is located on the arroyo bank that is undergoing minor erosion. During the 2010 inspection, it was decided that the erosion occurring at Site 50 would take a long time to reach the structure, and the erosion at Site 228A poses little concern to that site. With DOE personnel present during the 2010 inspection, it was decided that removing the centrifuge structures entirely would mitigate future concerns; however, the current rate of erosion would not affect either site for a long time. It was recommended to remove these sites from inspection requirements and only track them in the IC database. Removal of existing ER and caution signs was noted for maintenance this year. Discussions regarding the removal of the test structures are ongoing.

ER Sites 1 and 3, Radioactive Waste Landfill and Chemical Disposal Pits, were combined into one site during remediation. Old ER signs and other warning signs that remain on or close to the site have been removed.

Site 2, the Classified Waste Landfill, was inspected on March 31, 2010. Old ER signs and other warning signs that remain on or close to the site have been removed.

The Liquid Discharge site, Site 45, requires industrial land use restrictions and was inspected in April 2010. The boundaries of the site cross into Technical Area 4. No issues with respect to institutional controls were noted in the inspection. LTES signs were posted.

Site 190 is the Steam Plant Tank Farm requiring regulatory ICs of industrial land-use restrictions. During 2009, all of the tanks were removed from the site. The site is currently posted with LTES signs. No IC concerns or maintenance issues were identified during the 2010 inspection; however, it was noted that heavy equipment was being parked on the site.

The Lurance Canyon Burn Site, Sites 94B, 94F, and 94H, were inspected on April 24, 2010. All three sites have LTES signs installed as of this report date. Site 94H has an active burn pan located adjacent to the site.

LTS Site 98 is the trichloroethane (TCA) Photochemical Release site that has had a new building constructed (Building 751) on top of the old site. Building 751 occupies most of the old ER site boundary. Annual inspections are required at this site; however, signing remains to be determined. No issues were identified during the inspection.

6.0 CONCLUSIONS

Thirty-two sites were inspected during FY 2010 as part of the SNL/NM LTES IC Program. No major issues or findings were identified that would affect current or future ICs at any of the sites (Table 1). Based on this year's inspection results, 11 of the 13 corporately controlled sites identified as requiring annual inspections no longer meet that requirement, and in the future will only be tracked in the IC database. The remaining two corporately controlled sites (28-1 and 28-4) will require inspections, but the frequency has not been identified. Section 5.0 provides details of the results and disposition for these sites.

Maintenance issues identified during the FY 2010 inspections were noted and relayed to field personnel. The majority of maintenance issues involved installing LTES signs and removing ER signs from sites that no longer require ER postings. Most of the maintenance issues identified have been completed. LTES signs have been posted at the sites indicated in this report, and ER signs have been removed where identified.

Thirty sites were inspected in 2009. The issues and findings from those inspections have been resolved and are considered closed. No issues remain that need to be addressed.

Thirty- one ER additional sites are pending in the RCRA permit modification process that is expected to be completed during FY 2011. Once the NMED has issued regulatory determinations and the permit modifications (NMED 1997) are complete, these sites will be transferred to LTS and institutional controls will be implemented and, if required, inspected as part of the LTES IC Program.

7.0 REFERENCES

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