



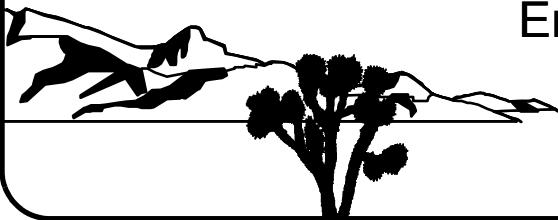
Addendum to the Closure Report for Corrective Action Unit 394: Areas 12, 18, and 29 Spill/Release Sites Nevada Test Site, Nevada

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October 2008

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**ADDENDUM TO THE CLOSURE REPORT
FOR CORRECTIVE ACTION UNIT 394:
AREAS 12, 18, AND 29 SPILL/RELEASE SITES
NEVADA TEST SITE, NEVADA**

U.S. Department of Energy
National Nuclear Security Administration
Nevada Site Office
Las Vegas, Nevada

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Addendum to the Closure Report for Removal of the Use Restriction

This document constitutes an addendum to the September 2003, Closure Report for Corrective Action Unit 394: Areas 12, 18, and 29 Spill/Release Sites as described in the document *Recommendations and Justifications for Modifications for Use Restrictions Established under the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office Federal Facility Agreement and Consent Order* (UR Modification document) dated February 2008. The UR Modification document was approved by NDEP on February 26, 2008. The approval of the UR Modification document constituted approval of each of the recommended UR modifications. In conformance with the UR Modification document, this addendum consists of:

- This cover page that refers the reader to the UR Modification document for additional information
- The cover and signature pages of the UR Modification document
- The NDEP approval letter
- The corresponding section of the UR Modification document

This addendum provides the documentation justifying the cancellation of the URs for:

- CAS 12-25-04, UST 12-16-2 Waste Oil Release
- CAS 18-25-01, Oil Spills
- CAS 18-25-02, Oil Spills
- CAS 18-25-03, Oil Spill
- CAS 29-44-01, Fuel Spill

These URs were established as part of *Federal Facility Agreement and Consent Order* (FFACO) corrective actions and were based on the presence of contaminants at concentrations greater than the action levels established at the time of the initial investigation (FFACO, 1996; as amended August 2006).

Since these URs were established, practices and procedures relating to the implementation of risk-based corrective actions (RBCA) have changed. Therefore, these URs were re-evaluated against the current RBCA criteria as defined in the *Industrial Sites Project Establishment of Final Action Levels* (NNSA/NSO, 2006c). This re-evaluation consisted of comparing the original data (used to define the need for the URs) to risk-based final action levels (FALs) developed using the current Industrial Sites RBCA process.

The re-evaluation resulted in a recommendation to remove these URs because contamination is not present at these sites above the risk-based FALs. Requirements for inspecting and maintaining these URs will be canceled, and the postings and signage at each site will be removed. Fencing and posting may be present at these sites that are unrelated to the FFACO URs such as for radiological control purposes as required by the *NV/YMP Radiological Control Manual* (NNSA/NSO, 2004f). This modification will not affect or modify any non-FFACO requirements for fencing, posting, or monitoring at these sites.



Recommendations and Justifications for
Modifications for Use Restrictions Established
under the U.S. Department of Energy,
National Nuclear Security Administration
Nevada Site Office
Federal Facility Agreement and Consent Order

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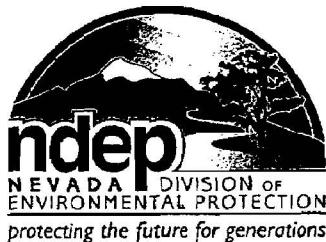
**Recommendations and Justifications for Modifications for
Use Restrictions Established under the U.S. Department of Energy,
National Nuclear Security Administration Nevada Site Office
*Federal Facility Agreement and Consent Order***

Approved by: /s/ Kevin J. Cabble Date: 02/05/2008

Kevin J. Cabble
Federal Sub-Project Director
Industrial Sites Sub-Project

Approved by: /s/ John B. Jones Date: 02/04/2008

John B. Jones
Acting Federal Project Director
Environmental Restoration Project



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Lea M. Drazdoff, P.E., Administrator

February 26, 2008

John B. Jones
Acting Federal Project Director
Environmental Restoration Project
National Nuclear Security Administration
Nevada Site Office
P. O. Box 98518
Las Vegas, NV 89193-8518

RE: Approval of Recommendations and Justifications for Modifications for Use Restrictions
Established under the U.S. Department of Energy, National Nuclear Security
Administration, Nevada Site Office *Federal Facility Agreement and Consent Order*

Dear Mr. Jones:

The Nevada Division of Environmental Protection, Bureau of Federal Facilities (NDEP) staff has received and reviewed the February 2008 final report for Recommendations and Justifications for Modifications for Use Restrictions Established under the U.S. Department of Energy, National Nuclear Security Administration, Nevada Site Office. The NDEP approves the requested changes to the previously agreed upon use restrictions for those Corrective Action Sites (CASSs) as described in the report.

Address any questions regarding this matter to either Ted Zaferatos at (702) 486-2850, ext. 234, or me at (702) 486-2850, ext. 231.

Sincerely

/s/ Tim Murphy

T.H. Murphy
Chief
Bureau of Federal Facilities

TZ

cc: E.F. DiSanza, WMP, NNSA/NSO
FFACO Group, PSG, NNSA/NSO, Las Vegas, NV
David C. Loewer, DTRA/CXT1, M/S 645, Mercury, NV
W.R. Griffin, SNJV/DTRA, M/S 645, Mercury, NV
T.A. Thiele, NSTec, Las Vegas, NV
R.F. Boehlecke, SNJV, Las Vegas, NV
K. J. Cabble, ERP, NNSA/NSO, Las Vegas, NV
John Wong, Jeff MacDougall, Dennis Nicodemus, NDEP Las Vegas, NV



18.0 CAU 394, CAS 12-25-04 – UST 12-16-2 Waste Oil Release

18.1 CAS Description

Corrective Action Site 12-25-04 consists of a documented release of waste oil from underground storage tank (UST) 12-16-2 at Building 12-16. Building 12-16 was used as the light duty shop (or lube shop) for Area 12 from roughly 1965 to the early to mid-1990s when it was closed. Waste oil was accumulated and stored in UST 12-16-2 before disposal. The waste oil release was originally discovered in July 1992, when stained soil was noted in an excavation approximately 10 ft to the south and east of UST 12-16-2. This excavation was intended to be used for the construction of a concrete pad for an AST to replace UST 12-16-2. The stained soil was sampled for a full suite of analysis. Only oil was found to exceed the regulatory limits (100 mg/kg). The release was determined to have exceeded the reporting limits for hydrocarbon spills and was reported to the State of Nevada and assigned the case number H920723D. The UST 12-16-2 was removed from the ground on October 12, 1992 (NNSA/NV, 2001e).

18.2 Current Use Restriction Description

The future use of any land affected by this UR is restricted from any DOE or Air Force activity that may alter or modify the containment control, as approved by the state and identified in the CAU CR or other CAU documentation, unless appropriate concurrence is obtained in advance. The UR is for subsurface contamination. Two UR signs, each mounted on a permanent post/pole, were placed around the contamination. There are no monitoring or inspection requirements associated with this UR (NNSA/NSO, 2003d).

18.3 Basis for Current Use Restriction

Fourteen soil samples were collected and analyzed for VOCs, SVOCs, RCRA metals, TPH (DRO and GRO), and PCBs. Arsenic and TPH (DRO) were the only contaminants with concentrations exceeding PALs. The concentrations of arsenic were above the PAL but within the range considered representative of ambient conditions at the site; therefore, arsenic is not considered to be a basis for this UR. Total petroleum hydrocarbons concentrations exceeded the PAL of 100 mg/kg in three samples. No VOCs or SVOCs were detected above PALs (NNSA/NSO, 2003d).

Sampling in the center of the backfilled excavation indicated that there were concentrations of TPH (DRO) that exceeded the PAL at a depth of 6 ft bgs. Samples confirm that the extent of

contamination does not extend laterally beyond 30 ft north and 35 ft south of the center of the excavation. Contamination does not appear to be present below 20 ft bgs. The source of the release has been removed (NNSA/NSO, 2003d).

Table 18-1 contains analytical results of all COCs at CAS 12-25-04 that are the basis for the current UR. The sample matrix for all samples is soil.

Table 18-1
Sample Results for COCs at CAS 12-25-04
Used To Establish Current Use Restriction

Sample ID	Sample Location	Depth (ft bgs)	TPH (DRO)
			PAL 100 mg/kg
394A002	Borehole 12250401	5.5 - 6	780 (J)
394A009	Borehole 12250403	8 - 8.5	200
394A010 (FD of 394A009)	Borehole 12250403	8 - 8.5	220

bgs = Below ground surface

ft = Foot

DRO = Diesel-range organics

ID = Identification

FD = Field duplicate

mg/kg = Milligrams per kilogram

J = Estimated value

TPH = Total petroleum hydrocarbons

18.4 Basis for Use Restriction Modification

The revised FALs associated with the TPH contamination were established based on the PALs of hazardous constituents of TPH diesel described in Section 2.2.2. Hazardous constituents of TPH diesel were not detected in any of the samples at concentrations greater than their respective PALs (NNSA/NSO, 2003d). Therefore, no contaminants are present at this site in concentrations exceeding the revised FALs, and all revised FALs were established at the PAL concentrations.

18.5 Proposed Modification

Remove the FFACO UR and associated fencing and postings from this site.

19.0 CAU 394, CAS 18-25-01 – Oil Spills

19.1 CAS Description

Corrective Action Site 18-25-01 consists of spills of oil and fuel (both gasoline and diesel) that were associated with the Area 18 Camp Gas Station. This site was recorded during the original inventory of inactive and abandoned waste sites at the NTS in 1991. The original site inventory form describes the site as “copious oil spills, various sizes, located near and around the old Gas Station 17 Camp” (NNSA/NV, 2001e).

Engineering drawings indicate the service station was in operation by 1964 or 1965. It is unknown when operations ceased. The USTs for this gas station were originally located southwest of the service station and are not included in the scope of this CAS (NNSA/NV, 2001e).

Surface conditions at the site in 2001 consisted of areas of gravel and weathered asphalt, areas of sediment from a flood event (erosion of the site appeared to be limited), and several concrete pads and the pump islands. It could not be determined during the 2001 site visit whether there is an intact layer of asphalt at the site. Individual stains were not identifiable in available pictures or during site visits (NNSA/NV, 2001e).

19.2 Current Use Restriction Description

The future use of any land affected by this UR is restricted from any DOE or Air Force activity that may alter or modify the containment control, as approved by the state and identified in the CAU CR or other CAU documentation, unless appropriate concurrence is obtained in advance. The UR is for subsurface contamination. A single UR sign was mounted on a permanent post/pole and placed at a select location within the CAS. There are no monitoring or inspection requirements associated with this UR (NNSA/NSO, 2003d).

19.3 Basis for Current Use Restriction

Twenty-three soil samples were collected from 15 locations and analyzed for VOCs, SVOCs, RCRA metals, TPH (DRO and GRO), PCBs, gamma spectroscopy, isotopic U, and isotopic Pu. Three sample results exceeded the PAL for TPH of 100 mg/kg. Sample 394B004 was collected from the borehole located northwest of the gasoline pump island. Samples 394B006 and 394B007 were collected from the northeast and southeast boreholes of the diesel pump island. All three samples were collected at 3 to 4 ft bgs. Total petroleum hydrocarbons were not

detected at concentrations exceeding the PAL below 4 ft bgs. Concentrations of TPH (DRO) were not detected in soil samples exceeding the PAL in lateral step-out samples. No VOCs or SVOCs were detected above PALs, and no other COPCs were detected at levels exceeding the PALs (NNSA/NSO, 2003d).

Table 19-1 contains analytical results of all COCs at CAS 18-25-01 that are the basis for the current UR. The sample matrix for all samples is soil.

Table 19-1
Sample Results for COCs at CAS 18-25-01
Used To Establish Current Use Restriction

Sample ID	Sample Location	Depth (ft bgs)	TPH (DRO)
			PAL 100 mg/kg
394B004	Borehole 18250104	3 - 4	260
394B006	Borehole 18250106	3 - 4	110
394B007	Borehole 18250107	3 - 4	220

bgs = Below ground surface

mg/kg = Milligrams per kilogram

DRO = Diesel-range organics

PAL = Preliminary action level

ft = Foot

TPH = Total petroleum hydrocarbons

ID = Identification

19.4 Basis for Use Restriction Modification

The revised FALs associated with the TPH contamination were established based on the PALs of hazardous constituents of TPH diesel as described in Section 2.2.2. Hazardous constituents of TPH diesel were not detected in any of the samples at concentrations greater than their respective PALs (NNSA/NSO, 2003d). Therefore, no contaminants are present at this site in concentrations exceeding the revised FALs, and all revised FALs were established at the PAL concentrations.

19.5 Proposed Modification

Remove the FFACO UR and associated fencing and postings from this CAS.

20.0 CAU 394, CAS 18-25-02 – Oil Spills, and CAS 18-25-03 – Oil Spill

20.1 CAS Descriptions

Corrective Action Site 18-25-02 consists of contaminated gravel and soil at the location of a former generator shack at the Area 18 Camp. This site was recorded during the original inventory of inactive and abandoned waste sites at the NTS in 1991. The original site inventory form describes the site as “large area of oil spilled on the ground inside the old generator shack (17 Camp).” No engineering drawings or other historical documentation could be found for this building other than those that describe it simply as a generator shack. It appears the shack was in operation by 1964 or 1965, ceased before 1970, and was demolished sometime between 1993 and 1997. The curbing for the foundation is still in place as are several concrete pads within the curbing. The remaining area inside the curbing is filled with pea gravel; some areas of which are darkly stained. It is unknown whether there is a solid concrete foundation under the pea gravel (NNSA/NV, 2001e).

Corrective Action Site 18-25-03 consists of contaminated soil at the former location of an AST. The AST was used to store diesel fuel to run a generator(s) at the Area 18 Control Point. This CAS is located approximately 10 to 20 ft north of CAS 18-25-02. The site is described as “oil spill approximately 6 to 8 ft² located under the aboveground fuel tank, about 300-gallon (gal) capacity, adjacent to the old generator shack.” The dates of operation of this tank are assumed to be the same as those of the generator shack. The AST was removed sometime between 1991 and 1997 (NNSA/NV, 2001e).

A PCB- and TPH-contaminated area encompassing both sites was removed and verification samples were collected and analyzed to verify removal of the contamination. Analytical results from the verification samples indicated that PCBs exceeding the PAL were removed, but TPH contamination remained above the PAL. The remaining TPH contamination was closed in place with one UR applying to both CASs 18-25-02 and 18-25-03 (NNSA/NSO, 2003d).

20.2 Current Use Restriction Description

The future use of any land affected by this UR is restricted from any DOE or Air Force activity that may alter or modify the containment control, as approved by the state and identified in the CAU CR or other CAU documentation, unless appropriate concurrence is obtained in advance. The UR is for subsurface contamination. Two sides of the combined area are bounded by chain-link fencing. Two UR signs, each mounted on a permanent post/pole, are placed at the

unfenced sides of the CASs. There are no monitoring or inspection requirements associated with this UR (NNSA/NSO, 2003d).

20.3 Basis for Current Use Restriction

Samples from CAS 18-25-02 were analyzed for VOCs, SVOCs, RCRA metals, TPH (DRO and GRO), and PCBs. Samples from CAS 18-25-03 were analyzed for gamma spectroscopy, isotopic U, isotopic Pu, VOCs, SVOCs, RCRA metals, TPH (DRO), and PCBs. Sampling of the material remaining (following remediation) indicated that concentrations of TPH (DRO) exceeded the PAL of 100 mg/kg at seven locations. On four sides of the excavation, samples were taken at depth to determine whether there has been any lateral migration of TPH (DRO). In addition, a soil boring was advanced in the excavation to determine the depth of contamination of TPH (DRO). The samples at depth and on the four sides of the excavation indicated that the remaining TPH-DRO and -GRO contamination is bounded within the CAS boundaries and by the underlying welded tuff bedrock. No VOCs or SVOCs were detected above PALs.

Concentrations of arsenic above the PAL of 2.7 mg/kg were also found in samples. However, these concentrations are within the range considered representative of ambient conditions at the site. Therefore, arsenic is not considered to be a basis for this UR. Levels of all other contaminants were below the PALs (NNSA/NSO, 2003d).

Table 20-1 contains analytical results of all COCs at CASs 18-25-02 and 18-25-03 that are the basis for the current UR. The sample matrix for all samples is soil.

Table 20-1
Sample Results for COCs at CASs 18-25-02 and 18-25-03
Used To Establish Current Use Restriction
(Page 1 of 2)

Sample ID	Location/Description	Depth (ft bgs)	TPH (DRO)	TPH (GRO)
			PAL 100 mg/kg	PAL 100 mg/kg
394C085	North wall toe of slope	6 - 7	4,000 (J)	--
394C091	West wall toe of slope	3 - 4	360 (J)	--
394C094	South side (surface)	0 - 1	390 (J)	--
394C095	Floor of excavation	6 - 7	2,300 (J)	--
394C096	Floor of excavation	6 - 7	1,200 (J)	--
394C097	Bottom of excavation	6 - 7	1,700 (J)	--
394C098	Floor of excavation	6 - 7	450 (J)	--

Table 20-1
Sample Results for COCs at CASs 18-25-02 and 18-25-03
Used To Establish Current Use Restriction
 (Page 2 of 2)

Sample ID No.	Location/Description	Depth (ft bgs)	TPH (DRO)	TPH (GRO)
			PAL 100 mg/kg	PAL 100 mg/kg
394C099	Floor of excavation	6 - 7	150 (J)	--
394C100	Floor of excavation	6 - 7	100 (J)	--
394C105	Deepest point of excavation	10 - 12	16,000 (J)	--
394C121	Boring C09	9 - 10	18,000 (J)	820

bgs = Below ground surface
 DRO = Diesel-range organics
 ft = Foot
 GRO = Gasoline-range organics

ID = Identification
 mg/kg = Milligrams per kilogram
 PAL = Preliminary action level
 TPH = Total petroleum hydrocarbons

J = Estimated value
 -- = No detects above action levels

20.4 Basis for Use Restriction Modification

The revised FALs associated with the TPH contamination were established based on the PALs of hazardous constituents of TPH diesel as described in Section 2.2.2. Hazardous constituents of TPH diesel were not detected in any of the samples at concentrations greater than their respective PALs (NNSA/NSO, 2003d). Therefore, no contaminants are present at this site in concentrations exceeding the revised FALs, and all revised FALs were established at the PAL concentrations.

20.5 Proposed Modification

Remove the FFACO UR and associated fencing and postings from this CAS.

21.0 CAU 394, CAS 29-44-01 – Fuel Spill

21.1 CAS Description

Corrective Action Site 29-44-01 is described as a fuel spill at the Shoshone Transmitter Site in Area 29. No information on the source or exact location of this release was provided.

A historical engineering drawing and a site visit identified two potential release sources at the Shoshone Transmitter Site, a former AST location and a soil stain (NNSA/NV, 2001e).

Historical engineering drawings indicated that there was an AST at the Shoshone Transmitter Station that was removed sometime before 1974. The AST is a potential source of a release. However, several longtime NTS employees at the site did not recall the AST ever having been at the site, or any release at the site. A site visit identified an earthen pad that appears to be in the location where the engineering drawings indicate the AST was located. The earthen pad is approximately 80 ft north of the transmitter station. There was no noted staining or odor evident in the area (NNSA/NV, 2001e).

Site visits to the Shoshone Transmitter Station also identified a hydrocarbon soil stain approximately 4 ft in diameter in the vicinity of the transmitter station. The stain is about 100 ft east of the station and is not related to the former AST location. The stain appears to be of recent origin (i.e., within the last five years) because it was first identified in 1998 and not recorded in previous site visits (NNSA/NV, 2001e).

21.2 Current Use Restriction Description

The future use of any land affected by this UR is restricted from any DOE or Air Force activity that may alter or modify the containment control, as approved by the state and identified in the CAU CR or other CAU documentation, unless appropriate concurrence is obtained in advance. The UR is for subsurface contamination. A single UR sign was mounted on a permanent post/pole at each release site. There are no monitoring or inspection requirements associated with this UR (NNSA/NSO, 2003d).

21.3 Basis for Current Use Restriction

Samples from the hydrocarbon soil stain were analyzed for VOCs, SVOCs, RCRA metals, TPH (DRO and GRO), and PCBs. Samples from the AST location were analyzed for TPH (DRO). Arsenic and TPH (DRO) were the only COPCs present at the CAS with concentrations exceeding their PALs. One sample from each location had concentrations of

TPH (DRO) above the PAL of 100 mg/kg. No VOCs or SVOCs were detected above PALs. The concentrations of arsenic above the PAL of 2.7 mg/kg were within the range considered representative of ambient conditions at the site. Therefore, arsenic is not considered to be a basis for this UR. Results from radiological analyses did not exceed activities greater than, or statistically distinguishable from, background activities (NNSA/NSO, 2003d).

Table 21-1 contains analytical results of all COCs at CAS 29-44-01 that are the basis for the current UR. The sample matrix for all samples is soil.

Table 21-1
Sample Results for COCs at CAS 29-44-01
Used To Establish Current Use Restriction

Sample ID	Sample Location	Depth (ft bgs)	TPH (DRO)
			PAL 100 mg/kg
394F001	West corner of AST earthen pad	0 - 0.5	110
394F009	Center of stained soil	0 - 0.5	23,000 (J)

AST = Aboveground storage tank
bgs = Below ground surface
DRO = Diesel-range organics
ft = Foot

ID = Identification
mg/kg = Milligrams per kilogram
PAL = Preliminary action level
TPH = Total petroleum hydrocarbons

J = Estimated value

21.4 Basis for Use Restriction Modification

The revised FALs associated with the TPH contamination were established based on the PALs of the hazardous constituents of TPH as described in Section 2.2.2. Hazardous constituents of TPH diesel were not detected in the sample with the TPH result of 23,000 mg/kg at concentrations greater than their respective PALs (NNSA/NSO, 2003d). No analytical results of the hazardous constituents of TPH (DRO) were available for the sample with 110 mg/kg of TPH (DRO). However, it is associated with the same diesel fuel spillage and there is no reasonable expectation that any constituent would exceed PALs. Therefore, no contaminants are present at this site in concentrations exceeding the revised FALs, and all revised FALs were established at the PAL concentrations.

21.5 Proposed Modification

Remove the FFACO UR and associated fencing and postings from this CAS.

References

FFACO, see *Federal Facility Agreement and Consent Order*.

Federal Facility Agreement and Consent Order. 1996 (as amended). Agreed to by the State of Nevada; U.S. Department of Energy, Environmental Management; U.S. Department of Defense; and U.S. Department of Energy, Legacy Management.

NNSA/NSO, see U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office.

NNSA/NV, see U.S. Department of Energy, National Nuclear Security Administration Nevada Operations Office.

U.S. Department of Energy, National Nuclear Security Administration Nevada Operations Office. 2001e. *Streamlined Approach for Environmental Restoration (SAFER) Plan for Corrective Action Unit 394: Areas 12, 18, and 29 Spill/Release Sites, Nevada Test Site*.

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