Nevada
Environmental
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DOE/NV/11718--209-ADD

National Nuclear Security Administration

Addendum to the Streamlined Approach for Environmental Restoration Closure Report for Corrective Action Unit 452: Historical Underground StorageTank Release Sites, Nevada Test Site, Nevada

Controlled Copy No.: ___
Revision No.: 0

May 2009

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U.S. Department of Energy
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ADDENDUM TO THE STREAMLINED APPROACH FOR ENVIRONMENTAL RESTORATION CLOSURE REPORT FOR CORRECTIVE ACTION UNIT 452: HISTORICAL UNDERGROUND STORAGE TANK RELEASE SITES, NEVADA TEST SITE, NEVADA

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

Controlled Copy No.: ___

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Reviewed and determined to be UNCLASSIFIED.

Derivative Classifier: Joseph Johnston, SNJV Classification Officer
(Name/personal identifier and position title)
Signature: /s/Joseph Johnston
Date: 5/11/2009

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Addendum to the Streamlined Approach for Environmental Restoration Closure Report for Removal of the Use Restriction

This document constitutes an addendum to the *Streamlined Approach for Environmental Restoration Closure Report for Corrective Action Unit 452: Historical Underground Storage Tank Release Sites, Nevada Test Site, Nevada,* April 1998 as described in the document *Supplemental Investigation Report for FFACO Use Restrictions, Nevada Test Site, Nevada* (SIR) dated November 2008. The SIR document was approved by NDEP on December 5, 2008. The approval of the SIR document constituted approval of each of the recommended UR removals. In conformance with the SIR document, this addendum consists of:

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

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

- 25-25-09, Spill H940825C (from UST 25-3101-1)
- 25-25-14, Spill H940314E (from UST 25-3102-3)
- 25-25-15, Spill H941020E (from UST 25-3152-1)

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).

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, 2006). 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, 2004). This modification will not affect or modify any non-FFACO requirements for fencing, posting, or monitoring at these sites.

References

DOE/NV, see U.S. Department of Energy, Nevada Operations Office.

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, and U.S. Department of Defense.

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

U.S. Department of Energy, Nevada Operations Office. 1998. *Streamlined Approach for Environmental Restoration Closure Report for Corrective Action Unit 452: Historical Underground Storage Tank Release Sites, Nevada Test Site, Nevada,* Rev. 0, DOE/NV/11718-209. April. Las Vegas, NV.

U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office. 2004. *NV/YMP Radiological Control Manual*, DOE/NV/11718--079, Rev. 5. Prepared by Bechtel Nevada. Las Vegas, NV.

U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office. 2006. *Industrial Sites Project Establishment of Final Action Levels,* Rev. 0, DOE/NV--1107. Las Vegas, NV.

U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office. 2008. *Supplemental Investigation Plan for FFACO Use Restrictions, Nevada Test Site, Nevada*, Rev. 0, DOE/NV--1256. Las Vegas, NV.

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National Nuclear Security Administration

Supplemental Investigation Report for FFACO Use Restrictions Nevada Test Site, Nevada

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November 2008

Environmental Restoration
Project

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

DOE/NV--1298

SUPPLEMENTAL INVESTIGATION REPORT FOR FFACO USE RESTRICTIONS NEVADA TEST SITE, NEVADA

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

Controlled Copy No.: ___

Revision No.: 0

November 2008

SUPPLEMENTAL INVESTIGATION REPORT FOR
FFACO USE RESTRICTIONS:
NEVADA TEST SITE, NEVADA

Approved by: /S/Kevin J. Cabble Date: 11/12/2008

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

Approved by: /S/ Robert F. Boehlecke Date: 11/12/2008

Robert F. Boehlecke
Federal Project Director
Environmental Restoration Project

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December 5, 2008

Robert F. Boehlecke
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 Final Supplemental Investigation Report for FFACO Use Restrictions Nevada Test Site and Tonopah Test Range, Nevada, Revision 0, November 2008
Federal Facility Agreement and Consent Order

Dear Mr. Boehlecke:

The Nevada Division of Environmental Protection, Bureau of Federal Facilities (NDEP) staff has received and reviewed the submittal of the Final Supplemental Investigation Report for FFACO Use Restrictions, Nevada Test Site and Tonopah Test Range, Nevada, Revision 0, November 2008. The report is hereby approved without comments pursuant to Subpart XII.8.a of the *Federal Facility Agreement and Consent Order* (FFACO).

Address any questions regarding this matter to either Ted Zaferatos at (702) 486-2850, ext. 234, Jeff MacDougall at (702) 486-2850, ext. 233, or me at (702) 486-2850, ext. 231.

Sincerely,

/s/Chris Andres for

T.H. Murphy
Chief
Bureau of Federal Facilities

ACTION	
INFO	AMEM
NSO/MGR	✓
AMBCM	
AMEM	✓
AMNS	
AMSO	
AMSS	
COR-RAI-	
File Code	

JJM/TZ

cc: K. J. Cabble, ERP, NNSA/NSO, Las Vegas, NV
E.F. DiSanza, WMP, NNSA/NSO
FFACO Group, PSG, NNSA/NSO, Las Vegas, NV
Jeffrey Fraher, DTRA/CXTS, Kirkland AFB, NM
W.R. Griffin, SNJV/DTRA, M/S 645, Mercury, NV
T.A. Thiele, NSTec, Las Vegas, NV
John Wong, Dennis Nicodemus, Kevin Campbell, NDEP Las Vegas, NV

Table 4-9
Sample Results for VOCs Detected above Minimum Detectable Concentrations at UR 03-02-004-0360

Sample Location	Sample Number	Depth (ft bgs)	Contaminants of Potential Concern (mg/kg)						
			1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	4-Isopropyltoluene	Acetone	Tetrachloroethylene	Toluene	Xylenes (total)
Final Action Levels[a]			**170**	**70**	**2,000**	**54,000**	**1.3**	**520**	**420**
M01	403M001	14.5 - 15.0	0.508 (J)	2.54 (J)	1.15 (J)	0.00964	0.00903	0.0022	0.556 (J)

[a]Based on U.S. Environmental Protection Agency, *Regional Screening Levels for Chemical Contaminants at Superfund Sites* (EPA, 2008a).

bgs = Below ground surface
ft = Foot
mg/kg = Milligrams per kilogram
J = Estimated value

4.4.5 Recommended Modification

Remove the FFACO UR, signage, and associated inspection and maintenance requirements from this site.

4.5 CAU 452, CAS 25-25-09 – Spill H940825C (from UST 25-3101-1)

4.5.1 CAS Description

Corrective Action Site 25-25-09 consists of a subsurface petroleum hydrocarbon release identified at the UST located at Building 3101 in Area 25. The 4,000-gal capacity diesel-fuel tank was located on the south side of the building within the Area 25 CP Facility. On July 20, 1994, the tank was removed, and closure of the UST (as part of CAS 25-02-13) was accepted by NDEP in 1995. Due to practical constraints at the site, soils surrounding the tank were not excavated and hydrocarbon releases to these soils were included in CAS 25-25-09 (DOE/NV, 1998b). This CAS was subject to corrective action that included sampling to define the extent of the release, and resulted in the implementation of a UR for TPH contamination (DOE/NV, 1998b).

4.5.2 Current Use Restriction Description

A UR is in place at the site due to TPH contamination. The UR, as described in the FFACO, states the future use of land related to this CAU, as described by surveyed location, is restricted from any activity that may alter or modify the containment control, as identified by the state and in the CR or other CAU documentation, unless appropriate concurrence is obtained in advance. Monitoring requirements have not been identified for the site.

4.5.3 Basis for Current Use Restriction

One sample was collected at the east end of the tank bottom at a depth of 9.5 ft bgs, with a concentration of 2,400 mg/kg, exceeding the action level of 100 mg/kg. A second sample was taken at a later date and at a depth of 12.5 ft bgs had a TPH concentration of 544 mg/kg, exceeding the action level of 100 mg/kg. The CAU 452 CR indicates that these two sampling areas were excavated after sampling. Additionally, 10 samples were taken from boreholes at CAS 25-25-09 and analyzed for TPH (gasoline, diesel, and oil). Of these samples, one sample from Borehole #1 at 20 ft bgs had a TPH diesel level of 420 mg/kg, exceeding the action level of 100 mg/kg; therefore, a UR was implemented (DOE/NV, 1998b).

4.5.4 Basis for Use Restriction Modification

One environmental sample was collected from a new borehole at CAS 25-25-09 according to the sampling plan (NNSA/NSO, 2008) and analyzed for VOCs and SVOCs in which the hazardous constituents of TPH are reported. Table 4-10 presents the VOC results that were detected above the MDCs. None of the SVOCs were detected above MDCs.

The analytical results were evaluated using the RBCA process (NNSA/NSO, 2006) in which the individual results of contaminants (detected above the MDCs) were compared to the FALs. None of the hazardous constituents of TPH were identified above their respective FALs; therefore, there are no COCs present at this site.

Table 4-10
Sample Results for VOCs Detected above Minimum Detectable Concentrations at UR 25-25-09

Sample Location	Sample Number	Depth (ft bgs)	Contaminants of Potential Concern (mg/kg)				
			Acetone	Ethylbenzene	Tetrachloroethylene	Toluene	Xylenes (total)
Final Action Levels[a]			**54,000**	**400**	**1.3**	**520**	**420**
H01	452H001	14.0 - 14.5	0.00289 (J)	0.000396 (J)	0.00178 (J)	0.000477 (J)	0.000831 (J)

[a]Based on U.S. Environmental Protection Agency, *Regional Screening Levels for Chemical Contaminants at Superfund Sites* (EPA, 2008a).

bgs = Below ground surface
ft = Foot
mg/kg = Milligrams per kilogram
J = Estimated value

4.5.5 Recommended Modification

Remove the FFACO UR, signage, and associated inspection and maintenance requirements from this site.

4.6 CAU 452, CAS 25-25-14 – Spill H940314E (from UST 25-3102-3)

4.6.1 CAS Description

Corrective Action Site 25-25-14 consists of a subsurface petroleum hydrocarbon release identified at UST 25-3102-3, located at southwest corner of Building 25-3102, within the Area 25 CP Facility. The tank stored waste oil and had an approximate 560-gal capacity. Analysis of the tank contents identified waste oil, PCBs, and barium. The contents of the tank were characterized as hazardous, subsequently removed, and treated following state and federal regulations. On March 9, 1994, the tank was removed and closure of the UST (as part of CAS 25-02-18) was accepted by NDEP in 1994. Soil samples collected below the north and south tank bottom from 10 ft bgs had elevated petroleum hydrocarbon concentrations; however, PCBs and barium were not detected. Additional excavation was conducted at the site in May, 1995, but soil samples collected at 13 ft bgs had TPH

contamination, and additional excavation was not possible due to practical constraints. The location of the tank next to Building 25-3102, limited backhoe accessibility due to a sloped embankment, and an underground utility line affected the range of movement of the backhoe. Hydrocarbon releases associated with the tank were included in CAS 25-25-14. The CAS was subject to corrective actions that included sampling to define the extent of release, resulting in the implementation of a UR for TPH contamination (DOE/NV, 1998b).

4.6.2 Current Use Restriction Description

A UR is in place at the site due to TPH contamination. The UR, as described in the FFACO, states the future use of land related to this CAU, as described by surveyed location, is restricted from any activity that may alter or modify the containment control, as identified by the state and in the CR or other CAU documentation, unless appropriate concurrence is obtained in advance. Monitoring requirements have not been identified for the site.

4.6.3 Basis for Current Use Restriction

Samples collected from a depth of 13 ft bgs from the north and south end of the tank excavation had TPH concentrations of 170 and 620 mg/kg, respectively, exceeding the action level of 100 mg/kg. Additionally, 10 samples were taken from boreholes at CAS 25-25-14 and analyzed for TPH (gasoline, diesel, and oil). Sample 3102/B2@15, collected at Borehole 2 from a depth of 15 ft bgs, had a TPH diesel level of 1,400 mg/kg, exceeding the action level of 100 mg/kg; therefore, a UR was implemented (DOE/NV, 1998b).

4.6.4 Basis for Use Restriction Modification

One environmental sample was collected from a new borehole at CAS 25-25-14 according to the sampling plan (NNSA/NSO, 2008) and analyzed for VOCs and SVOCs in which the hazardous constituents of TPH are reported. Table 4-11 presents the VOC results that were detected above the MDCs. None of the SVOCs were detected above MDCs.

The analytical results were evaluated using the RBCA process (NNSA/NSO, 2006) in which the individual results of contaminants (detected above the MDCs) were compared to the FALs. None of

the hazardous constituents of TPH were identified above their respective FALs; therefore, there are no COCs present at this site.

Table 4-11
Sample Results for VOCs Detected above Minimum Detectable Concentrations at UR 25-25-14

Sample Location	Sample Number	Depth (ft bgs)	Contaminants of Potential Concern (mg/kg)			
			2-Butanone	Acetone	Tetrachloroethylene	Xylenes (total)
Final Action Levels[a]			**110,000**	**54,000**	**1.3**	**420**
J01	452J001	16.0 - 16.5	0.00259 (J)	0.0119	0.000648 (J)	0.00056 (J)

[a]Based on U.S. Environmental Protection Agency, *Regional Screening Levels for Chemical Contaminants at Superfund Sites* (EPA, 2008a).

bgs = Below ground surface
ft = Foot
mg/kg = Milligrams per kilogram
J = Estimated value

4.6.5 Recommended Modification

Remove the FFACO UR, signage, and associated inspection and maintenance requirements from this site.

4.7 CAU 452, CAS 25-25-15 – Spill H941020E (from UST 25-3152-1)

4.7.1 CAS Description

Corrective Action Site 25-25-15 consists of a subsurface petroleum hydrocarbon release identified at the UST located on the west side of the former Radiological Safety Building 25-3152 in Area 25. The tank had an approximate 1,000-gal capacity and supplied fuel oil for a boiler. On August 24, 1994, the tank was removed and closure of the UST (as part of CAS 25-02-19) was accepted by NDEP in 1995. Following tank removal, additional excavation was conducted in May, 1995, and a soil sample collected from 20 ft bgs had elevated levels of TPH. Hydrocarbon releases associated with the tank

were included in CAS 25-25-15. The CAS was subjected to corrective actions that included sampling to define the extent of the release, resulting in the implementation of a UR (DOE/NV, 1998b).

4.7.2 Current Use Restriction Description

A UR is in place at the site due to TPH contamination. The UR, as described in the FFACO, states the future use of land related to this CAU, as described by surveyed location, is restricted from any activity that may alter or modify the containment control, as identified by the state and in the CR or other CAU documentation, unless appropriate concurrence is obtained in advance. Monitoring requirements have not been identified for the site.

4.7.3 Basis for Current Use Restriction

Samples were collected below the south excavation bottom from a depth of approximately 20 ft bgs from the south end of the tank; one had a TPH concentration of 1,900 mg/kg, exceeding the action level of 100 mg/kg. Additionally, 10 samples were taken from boreholes at CAS 25-25-15 and analyzed for TPH (gasoline, diesel, and oil). Levels of TPH diesel, exceeding the action level of 100 mg/kg, were detected in 4 of 18 samples; therefore, a UR was implemented. Table 4-12 contains analytical results for soil samples used to establish UR 25-25-15 (DOE/NV, 1998b).

Table 4-12
Sample Results for the Basis of UR 25-25-15

Borehole Identification	Sample Identification	Depth (ft bgs)	TPH Diesel (mg/kg)
			Action Level 100 mg/kg
Borehole 1	3152/B1@35	35	**1,700**
Borehole 1	3152/B1@40	40	**620**
Borehole 2	3152/B2@40	40	**120**
Borehole 4	3152/B4@35	35	**1,600**

Note: Bold text indicates value exceeding the action level.

bgs = Below ground surface
ft = Foot
mg/kg = Milligrams per kilogram
TPH = Total petroleum hydrocarbons

4.7.4 Basis for Use Restriction Modification

Two environmental samples were collected from a new borehole at CAS 25-25-15 according to the sampling plan (NNSA/NSO, 2008) and analyzed for VOCs and SVOCs in which the hazardous constituents of TPH are reported. Tables 4-13 and 4-14 present the VOC and SVOC results, respectively, that were detected above the MDCs.

The analytical results were evaluated using the RBCA process (NNSA/NSO, 2006) in which the individual results of contaminants (detected above the MDCs) were compared to the FALs. None of the hazardous constituents of TPH were identified above their respective FALs; therefore, there are no COCs present at this site.

4.7.5 Recommended Modification

Remove the FFACO UR, signage, and associated inspection and maintenance requirements from this site.

Table 4-13
Sample Results for VOCs Detected above Minimum Detectable Concentrations at UR 25-25-15

Sample Location	Sample Number	Depth (ft bgs)	Contaminants of Potential Concern (mg/kg)											
			1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	2-Butanone	4-Isopropyltoluene	Acetone	Ethylbenzene	Isopropylbenzene	n-Butylbenzene	n-Propylbenzene	Sec-Butylbenzene	Tetrachloroethylene	Xylenes (total)
Final Action Levels[a]			**170**	**70**	**110,000**	**2,000**	**54,000**	**400**	**2,000**	**240**	**240**	**220**	**1.3**	**420**
K01	452K001	34.5 - 35.0	0.0341 (J)	0.0.0463 (J)	0.00519 (J)	0.0338 (J)	0.0136 (J)	0.00114 (J)	0.00629 (J)	0.0323 (J)	0.0162 (J)	0.0301 (J)	0.00701 (J)	0.00476 (J)
	452K002	34.5 - 35.0	0.00567	0.00767	--	0.00565	0.00702 (J)	0.000243 (J)	0.00108	0.00569	0.00272	0.00526	0.00375	0.000826 (J)

[a]Based on U.S. Environmental Protection Agency, *Regional Screening Levels for Chemical Contaminants at Superfund Sites* (EPA, 2008a).

bgs = Below ground surface
ft = Foot
mg/kg = Milligrams per kilogram

J = Estimated value
-- = Not detected above minimum detectable concentrations.

Table 4-14
Sample Results for SVOCs Detected above Minimum Detectable Concentrations at UR 25-25-15

Sample Location	Sample Number	Depth (ft bgs)	Contaminants of Potential Concerns (mg/kg)			
			2-Methylnaphthalene	Carbazole	Phenanthrene	Pyrene
Final Action Levels[a]			**190**	**86**	**100,000**	**100,000**
K01	452K001	34.5 - 35.0	1.14	--	1.44	0.0816
	452K002	34.5 - 35.0	0.0451	0.186	1.57	--

[a]Based on U.S. Environmental Protection Agency, *Regional Screening Levels for Chemical Contaminants at Superfund Sites* (EPA, 2008a).

bgs = Below ground surface
ft = Foot
mg/kg = Milligrams per kilogram
-- = Not detected above minimum detectable concentrations.

4.8 CAU 454, CAS 12-25-08 – Spill H950524F (from UST 12-B-1)

4.8.1 CAS Description

Corrective Action Site 12-25-08 consists of a subsurface petroleum hydrocarbon release from the UST located at the "B" Tunnel in Area 12. The UST was located east of the main portal entrance to "B" Tunnel. The approximate 500-gal capacity tank contained approximately 400 gal of diesel fuel at the time of identification. The tank was situated on a hillside slope and was partially exposed at the surface. On March 1, 1995, the tank was removed and hydrocarbon releases associated with the tank were included in CAS 12-25-08. The CAS was subjected to corrective actions that resulted in the implementation of a UR for TPH contamination (DOE/NV, 1998c).

4.8.2 Current Use Restriction Description

A UR is in place at the site due to TPH contamination. The UR, as described in the FFACO, states the future use of land related to this CAU, as described by surveyed location, is restricted from any activity that may alter or modify the containment control, as identified by the state and in the CR or

References

DOE/NV, see U.S. Department of Energy, Nevada Operations Office.

EPA, see U.S. Environmental Protection Agency.

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

Federal Facility Agreement and Consent Order. 1996 (as amended February 2008). 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.

U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office. 2004f. *NV/YMP Radiological Control Manual*, DOE/NV--11718-079, Rev. 5. Prepared by Bechtel Nevada. Las Vegas, NV.

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U.S. Environmental Protection Agency. 2008a. *Regional Screening Levels for Chemical Contaminants at Superfund Sites.* As accessed at http://epa-prgs.ornl.gov/chemicals/index.shtml on 27 July. Prepared by EPA Office of Superfund and Oak Ridge National Laboratory.

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