

Nevada  
Environmental  
Restoration  
Project

DOE/NV--11718-211-ADD



# Addendum to the Streamlined Approach for Environmental Restoration Closure Report for Corrective Action Unit 454: Historical Underground Storage Tank Release Sites, Nevada Test Site, Nevada

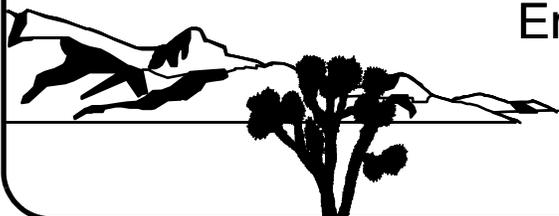
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**ADDENDUM TO THE STREAMLINED APPROACH FOR  
ENVIRONMENTAL RESTORATION CLOSURE REPORT  
FOR CORRECTIVE ACTION UNIT 454:  
HISTORICAL UNDERGROUND STORAGE TANK  
RELEASE SITES, NEVADA TEST SITE, NEVADA**

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

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## **Addendum to the Closure Report for Removal of the Use Restriction**

This document constitutes an addendum to the April 1998, Streamlined Approach for Environmental Restoration Closure Report for Corrective Action Unit 454: Historical Underground Storage Tank 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 UR for CAS 12-25-09, Spill 960722-02 (from UST 12-B-3). This UR was established as part of a *Federal Facility Agreement and Consent Order* (FFACO) corrective action and is 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 this UR was established, practices and procedures relating to the implementation of risk-based corrective actions (RBCA) have changed. Therefore, this UR was 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 UR) to risk-based final action levels (FALs) developed using the current Industrial Sites RBCA process.

The re-evaluation resulted in a recommendation to remove the UR because contamination is not present at the site above the risk-based FALs. Requirements for inspecting and maintaining this UR will be canceled, and the postings and signage at this site will be removed. Fencing and posting may be present at this site that are unrelated to the FFACO UR 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 this site.

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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*

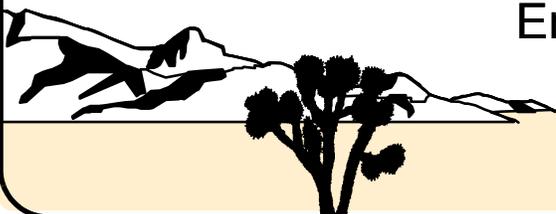
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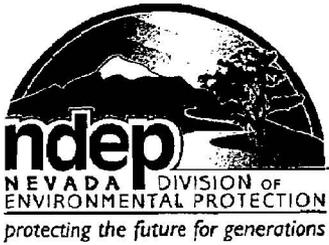
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# STATE OF NEVADA

Department of Conservation & Natural Resources  
DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, 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 (CASs) 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  
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K. J. Cabble, ERP, NNSA/NSO, Las Vegas, NV  
John Wong, Jeff MacDougall, Dennis Nicodemus, NDEP Las Vegas, NV



## ***27.0 CAU 454, CAS 12-25-09, Spill 960722-02 (from UST 12-B-3)***

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### ***27.1 CAS Description***

The UST 12-B-3 was located west of the main portal entrance to B-Tunnel. The tank was located on top of an abandoned bunker facility constructed into the mountainside. The tank had an approximate capacity of 1,900 liters (500 gal), was empty at the time of identification, and was removed on May 6, 1996. One sample collected from below the tank bottom during excavation had a TPH concentration of 310 mg/kg, as waste oil; but upon exposing the tank, it was discovered that it was constructed of galvanized steel and was most likely used to store water. In addition, the tank interior was observed to be clean and had no evidence of being used to store fuel or oil. Further investigation of the site suggested that, because the tank was located on top of a bunker complex, the source of the oil hydrocarbons may be from an oil sealant of the structure exterior or from wooden supports identified in the excavation bottom (DOE/NV, 1998d).

### ***27.2 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. There are no site monitoring requirements (Lawrence, 2000). There is a larger UR (for CASs 12-01-09, 12-06-05, 12-06-07, and 12-06-08) that encompasses this UR.

### ***27.3 Basis for Current Use Restriction***

Five soil samples were taken from the site and analyzed for TPH (oil). The current UR is based on one sample with a TPH (oil) concentration of 120 mg/kg, exceeding the 100 mg/kg PAL (DOE/NV, 1998d).

### ***27.4 Basis for Use Restriction Modification***

Upon removal of this UR, the larger UR (for CASs 12-01-09, 12-06-05, 12-06-07, and 12-06-08) that encompasses this UR, will remain in place and will prevent inadvertent entry into the area covered by this UR.

### ***27.5 Proposed Modification***

Remove the FFACO UR from this site, but leave the larger UR (for CASs 12-01-09, 12-06-05, 12-06-07, and 12-06-08) that encompasses the FFACO UR.

## **References**

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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, Environmental Management; U.S. Department of Defense; and U.S. Department of Energy, Legacy Management.

Lawrence, S.J., U.S. Department of Energy, Nevada Operations Office. 2000. Letter to R.C. Wycoff, (DOE/NV) entitled, "Completion of Information into FIMS on CAU Numbers 424, 427, 40, 44, 339, 364, 452, 454, 456, and 464 by Bechtel Nevada (BN)," 24 January. Las Vegas, NV.

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.

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

U.S. Department of Energy, Nevada Operations Office. 1998d. *Streamlined Approach for Environmental Restoration Closure Report for Corrective Action Unit 454 Historical Underground Storage Tank Release Sites, Tank Release Sites, Nevada Test Site, Nevada*, Rev. 0, DOE/NV/11718-211. April. Las Vegas, NV.

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