7-1-2004

Justification for Class III Permit Modification July 2004 DSS Site 1091 Operable Unit 1295 Building 6720 Septic System

Sandia National Laboratories/NM

Sandia National Laboratories

Justification for Class III Permit Modification

July 2004

DSS Site 1091
Operable Unit 1295
Building 6720 Septic System

NFA (SWMU Assessment Report) Submitted June 2003

Environmental
Restoration
Project

United States Department of Energy
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Department of Energy
National Nuclear Security Administration
Sandia Site Office
P.O. Box 5400
Albuquerque, New Mexico 87185-5400

JUL 10 2003

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. John E. Kieling, Manager
Permits Management Program
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Rd., Building E
Santa Fe, NM 87505

Dear Mr. Kieling:

On behalf of the Department of Energy (DOE) and Sandia Corporation, DOE is submitting the enclosed SWMU Assessment Reports and Proposals for No Further Action (NFA) for Drain and Septic Systems (DSS) Sites 1003, 1008, 1072, 1082, and 1091, at Sandia National Laboratories, New Mexico, EPA ID No. NM5890110518.

This submittal includes descriptions of the site characterization work, soil characterization data, and risk assessments for DSS Sites 1003, 1008, 1072, and 1082. The risk assessments conclude that for these four sites (1) there is no significant risk to human health under both the industrial and residential land-use scenarios, and (2) that there are no ecological risks associated with these sites. A petition for an administrative NFA proposal is also made for DSS Site 1091 because this site was shown not to exist.

DOE and Sandia are requesting a determination that these DSS sites are acceptable for No Further Action.

If you have any questions, please contact John Gould at (505) 845-6089.

Sincerely,

Karen L. Boardman
Manager

JUL 10 2003

cc w/enclosure:
W. Moats, NMED-HWB (via Certified Mail)
M. Gardipe, ERD
R. Kennett, NMED-OB
L. King, EPA, Region 6 (2 copies, via Certified Mail)

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J. Bearzi, NMED-HWB
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F. Nimick, SNL, MS 1087
D. Stockham, SNL, MS 1087
SSO Legal File

Sandia National Laboratories/New Mexico
Environmental Restoration Project

SWMU ASSESSMENT REPORT AND PROPOSAL FOR NO FURTHER ACTION BUILDING 6720 SEPTIC SYSTEM, DRAIN AND SEPTIC SYSTEMS SITE 1091

June 2003

United States Department of Energy
Sandia Site Office

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ACRONYMS AND ABBREVIATIONS

DOU	Document of Understanding
DSS	Drain and Septic Systems
ER	Environmental Restoration
HWB	Hazardous Waste Bureau
NFA	no further action
NMED	New Mexico Environment Department
PRS	Potential Release Site
RCRA	Resource Conservation and Recovery Act
SNL/NM	Sandia National Laboratories/New Mexico
TA	Technical Area

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1.0 INTRODUCTION

Sandia National Laboratories/New Mexico (SNL/NM) is submitting this information in support of a proposal for an administrative no further action (NFA) decision for the Building 6720 Drain and Septic System (DSS) Site 1091. This letter report presents the results of the investigation performed, which shows the system does not exist.

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2.0 SNL/NM NFA PROCESS

Resource Conservation and Recovery Act (RCRA) environmental activities at SNL/NM are regulated by the New Mexico Environment Department (NMED) under the Hazardous and Solid Waste Amendments Module of the RCRA Permit for the facility (U.S. Environmental Protection Agency ID No. 5890110518).

This proposal for determination of an NFA decision has been prepared following the criteria taken from the Environmental Restoration (ER) Project Document of Understanding (DOU) (NMED April 1996):

- NFA Criterion 1: The site cannot be located or has been found not to exist, is a duplicate potential release site (PRS), or is located within, and therefore investigated as, part of another PRS.

DSS Site 1091 is being proposed for an NFA decision based on existing administrative information supported by a field investigation showing that this site does not exist.

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3.0 HISTORY OF UNIT

Building 6720 is located in the northwest part of SNL/NM Technical Area (TA)-III. As shown on SNL/NM Facilities Engineering drawing number 97071, sheet M-1, the system supposedly consisted of a 1,000-gallon septic tank and a Y-shaped drainfield with two 30-foot-long laterals (Figure 3-1). In 1996, the SNL/NM ER Project compiled a list of 101 non-ER Project DSS sites. The Building 6720 system was designated as DSS Site 1091 on that list.

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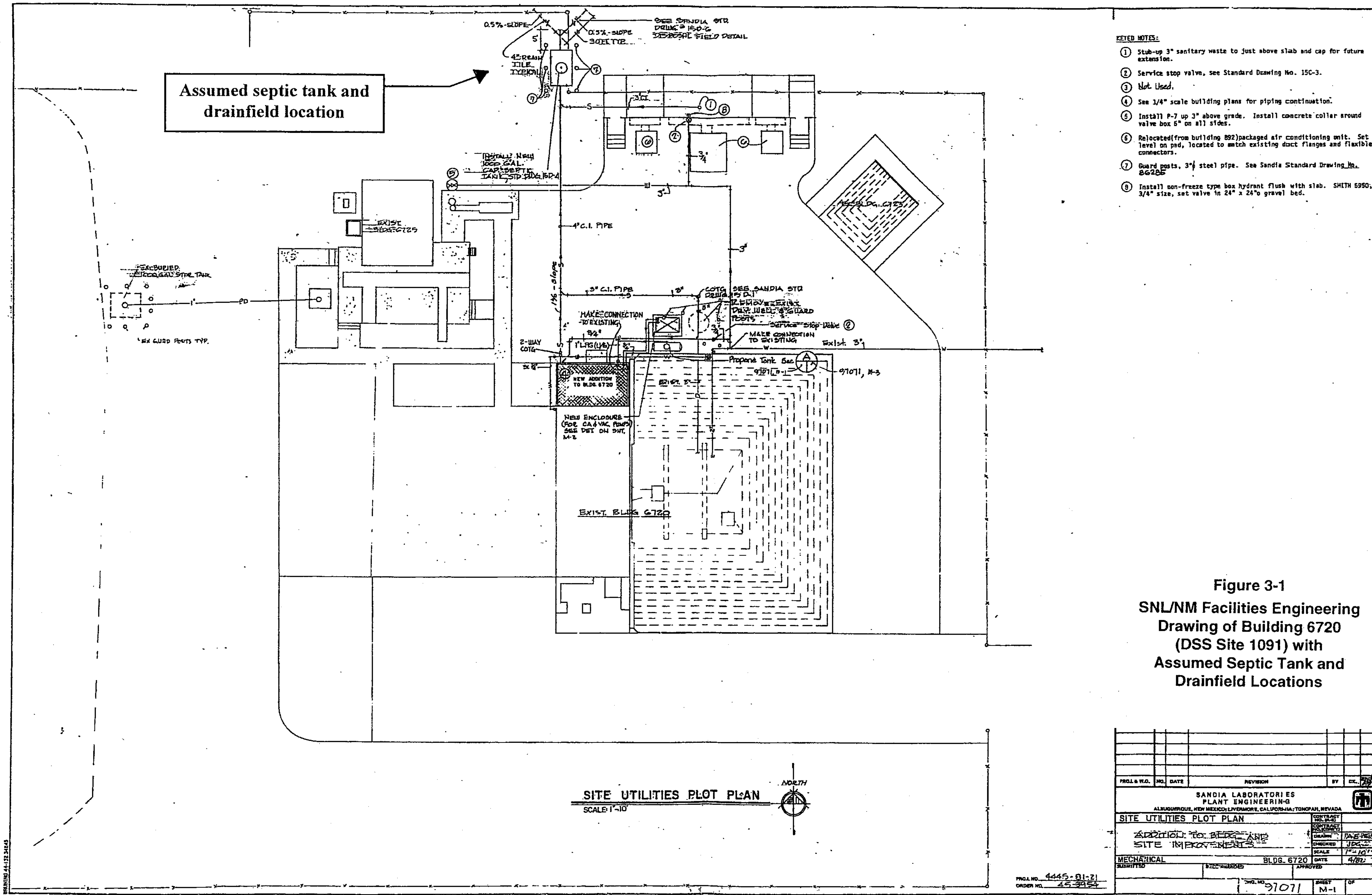
Assumed septic tank and drainfield location
KEYED NOTES:
① Stub-up 3" sanitary waste to just above slab and cap for future extension.
② Service stop valve, see Standard Drawing No. 15C-3.
③ Not Used.
④ See 1/4" scale building plans for piping continuation.
⑤ Install P-7 up 3" above grade. Install concrete collar around valve box 6" on all sides.
⑥ Relocated(from building 892)packaged air conditioning unit. Set level on pad, located to match existing duct flanges and flexible connectors.
⑦ Guard posts, 3"ϕ steel pipe. See Sandia Standard Drawing No. 86285
⑧ Install non-freeze type box hydrant flush with slab. SMITH 5950; 3/4" size, set valve in 24" x 24"o gravel bed.
4" C.I. PIPE
3" C.I. PIPE
MAKE CONNECTION TO EXISTING
NEW ADDITION TO BLDG. 6720
EXIST. BLDG 6720
SITE UTILITIES PLOT PLAN
SCALE 1"=10'
NORTH
SANDIA LABORATORIES
PLANT ENGINEERING
SITE UTILITIES PLOT PLAN
MECHANICAL
BLDG. 6720
97071
M-1

Figure 3-1
SNL/NM Facilities Engineering Drawing of Building 6720 (DSS Site 1091) with Assumed Septic Tank and Drainfield Locations

4.0 EVALUATION OF RELEVANT EVIDENCE

SNL/NM ER Project and NMED Hazardous Waste Bureau (HWB) personnel inspected DSS Site 1091 on September 20, 1999. No surface indication of the septic tank for this system was found, which was considered unusual because most SNL/NM septic tanks were constructed with at least one above-grade access port. The interior of Building 6720 was also inspected and only a sink was found. There was no bathroom and no floor drains were apparent. These findings suggested that the septic system was no longer in existence, or perhaps had never been constructed in the first place.

The NMED/HWB regulator decided that the system should be located using backhoe excavation, and if it were constructed as shown on the engineering drawing, one soil boring located along each of the two main drainlines would be required to evaluate the subsurface for evidence of a contaminant release. No passive soil vapor sampling was required for this site.

On March 19, 2002, a backhoe was taken to the site and two trenches were excavated to locate buried components of the system. Neither the SNL/NM Facilities Engineering digging permit maps nor the utility location markings for the excavation work showed any indication of a septic system at this facility, which again suggested that the system did not exist. One trench was excavated across the drain line locations shown on the engineering drawing (Figure 4-1). The second trench was excavated at the septic tank location shown on the drawing (Figure 4-2). No evidence of the drainfield drain lines, aggregate-filled drain line trenches, or a septic tank were found in either of the excavated trenches. It was consequently concluded that the septic system shown on the 1982 engineering drawing had never been constructed at this facility, and therefore did not exist.

An additional excavation on March 19, 2002 located the drywell on the north side of Building 6720. It was determined that the building sink had at one time drained to this drywell, and had been subsequently connected to the City of Albuquerque sanitary sewer system when the system was extended into the TA-III area in the early 1990s.

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Figure 4-1
Trench Excavated East to West North of Building 6720 to Locate Possible Drainfield.
No drainlines were found and the septic system (DSS Site 1091) was
determined not to exist. March 19, 2002

Figure 4-2
Trench Excavated at Septic Tank Location as Shown on
Engineering Drawings North of Building 6720.
Partly backfilled drainfield exploratory trench shown in Figure 4-1 is in the foreground.
No evidence of a septic tank was found, and the septic system (DSS Site 1091) was
determined not to exist. March 19, 2002

5.0 CONCLUSIONS

Based upon the results of the field investigation, an administrative NFA decision is being recommended for DSS Site 1091 for the following reason:

- The Building 6720 septic system has never been constructed, and therefore does not exist.

Based upon the evidence provided, DSS Site 1091 is proposed for an NFA decision based on Criterion 1 of the ER DOU (NMED April 1996).

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6.0 REFERENCES

New Mexico Environment Department (NMED), April 1996. "Environmental Restoration Department Document of Understanding," agreement between New Mexico Environment Department, U.S. Environmental Protection Agency, U.S. Department of Energy, Los Alamos National Laboratory, and Sandia National Laboratories/New Mexico, Santa Fe, New Mexico.

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