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Risk Reduction and Environmental Stewardship— Remediation Services

Quality Procedure

for Identification, Documentation, and Reporting of Newly-Identified Potential Release Sites

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Identification, Documentation, and Reporting of Newly-Identified Potential Release Sites

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Identification, Documentation, and Reporting of Newly-Identified Potential Release Sites

1.0 PURPOSE

This quality procedure (QP) states the responsibilities and describes the process for responding to the possible discovery of a newly-identified potential release site (PRS) for the Risk Reduction and Environmental Stewardship (RRES) Division Environmental Characterization and Remediation (ECR) Group at Los Alamos National Laboratory (LANL or the Laboratory). This procedure integrates the criteria of the “Risk Reduction and Environmental Stewardship – Remediation Services Project Quality Management Plan,” hereinafter referred to as the Quality Management Plan.. The QP includes determining whether a site is a newly-identified PRS and if so, determining whether a newly-identified PRS is a solid waste management unit (SWMU) or an area of concern (AOC). The QP also includes notification requirements, including those required by Module VIII of LANL’s Hazardous Waste Facility Permit for notification of newly-identified SWMUs. Finally, the QP describes actions required to assure that newly-identified PRSs are properly entered into RRES—Remediation Services (RS) information management systems, including the PRS database.

2.0 SCOPE

All **RRES-RS/ECR personnel** shall implement this mandatory procedure when responding to the possible discovery of a newly-identified PRS for RRES-RS/ECR.

3.0 TRAINING

- 3.1 **RRES-RS/ECR personnel** shall train (e.g., by reading and/or completing on-the-job or classroom training) to and use the current version of QP-2.2, “Personnel Orientation and Training.”
- 3.2 **RRES-/ECR personnel** shall document training to this procedure in accordance with Section 6.0 of this QP.
- 3.3 The responsible **project leader** shall monitor the proper implementation of this procedure.
- 3.4 The responsible **team leader** shall ensure that the appropriate personnel complete all applicable training assignments.

- 3.5 **RRES-RS/ECR personnel** may request assistance with implementation of this procedure from a RRES-RS/ECR Quality Integration and Improvement (QII) team quality specialist.

4.0 DEFINITIONS

- 4.1 *1990 SWMU Report* — The 1990 SWMU Report (LANL 1990, 7511.1, 7512.1, 7513.1, and 7514.1) is a hard copy compilation of information including, but not limited to, locations of PRSs and related possible contaminants.
- 4.2 *Administrative authority (AA)* — The government agency with administrative authority over actions conducted at a particular PRS. Depending on the type of PRS, the AA may be the New Mexico Environment Department, the US Environmental Protection Agency, or the US Department of Energy.
- 4.3 *Area of concern* — An area of potential contamination at LANL that might warrant further investigation or remediation, but which is not a solid waste management unit.
- 4.4 *Hazardous constituent* — Any constituent identified in Appendix VIII of 40 CFR 261, or any constituent identified in Appendix IX of 40 CFR 264.
- 4.5 *Hazardous waste* — A solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may cause or significantly contribute to an increase in serious irreversible, or incapacitating irreversible, illness; or pose a substantial present or potential hazard to human health and the environment when improperly treated, stored, transported, or disposed of, or otherwise managed. Hazardous waste includes hazardous constituents.
- 4.6 *Installation work plan (IWP)* — A document that is prepared in accordance with Module VIII of LANL's Hazardous Waste Facility Permit and is revised periodically to reflect the current status of the RRES-RS/ECR . An updated list of all PRSs is included in Attachment B of the IWP.
- 4.7 *Newly-identified PRS* — A PRS not specifically identified by the 1990 SWMU Report, or subsequent revisions of the SWMU Report, discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means. Newly-identified PRSs do not include operational waste management units placed into service after publication of the 1990 SWMU Report.

- 4.8 *Potential release site (PRS)*— A potentially contaminated site at LANL identified either as a SWMU or an AOC. The term PRS refers to SWMUs and AOCs collectively.
- 4.9 *Project leader*— Project leaders are responsible for working with regulatory compliance staff to verify new PRSs in technical areas (TAs) under the project leader's direction.
- 4.10 *PRS database*— The PRS database is an electronic system maintained by the RRES-RS/ECR project office that contains current status information on each PRS. The system is the official list of all RRES-RS/ECR PRSs, either active or inactive and contains each PRS's status in Module VIII of LANL's Hazardous Waste Facility Permit.
- 4.11 *PRS database manager*— The PRS database and the RRES-RS/ECR geographic information system (GIS) are coordinated and maintained by interactions between the PRS database manager and the RRES-RS/ECR GIS unit leader. The PRS database manager periodically transfers data on the regulatory status of PRSs to the RRES-RS/ECR GIS unit from the PRS database. The PRS database manager is responsible for
- managing the PRS database by maintaining the status and pertinent information relative to all PRSs;
 - providing PRS identifier numbers (Attachment A) for newly-identified sites to the RRES-RS/ECR regulatory compliance staff; and
 - sending the newly identified PRS numbers to the RRES-RS/ECR GIS unit.
- 4.12 *Quality procedure*— Within the RRES-RS/ECR , a QP is a document that describes the process for performing an activity governed by the RRES-RS Project, Quality Management Plan.
- 4.13 *Release*— Any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, or other closed receptacles containing hazardous waste or hazardous constituents).
- 4.14 *Regulatory compliance staff*— Regulatory compliance staff is responsible for
- working with PLs to perform independent verification of the existence of new PRSs;

- reporting verified SWMUs to the Department of Energy (DOE) and the AA (i.e., New Mexico Environment Department [NMED]);
 - coordinating with RRES division outreach staff to inform LANL's Public Affairs Office when appropriate;
 - coordinating with other institutional programs, as appropriate (e.g., Health, Safety, and Radiation Protection Division personnel or Facility and Waste Operations Division Solid Waste Operations Group);
 - obtaining unique identifiers for PRSs from the PRS database manager; and
 - compiling an annual summary report of newly identified PRSs.
- 4.15 *RRES-RS/ECR GIS Unit Leader* — A person who ensures the capture of the PRS extent at a precision consistent with the accuracy of the data.
- 4.16 *Solid waste* — Any garbage, refuse, sludge (from a wastewater treatment plant, water supply treatment plant, or air pollution control facility), or other discarded material including solid, liquid, semisolid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities. Solid waste does not include solid or dissolved materials in domestic sewage, irrigation return flow, or industrial point-source discharges subject to permits under the Clean Water Act. Solid waste also does not include source, special nuclear, or byproduct material as defined by the Atomic Energy Act.
- 4.17 *Solid waste management unit (SWMU)* — Any discernible unit at which solid wastes have been routinely and systematically placed at any time, regardless of whether the unit was intended for the management of solid or hazardous waste.

5.0 RESPONSIBLE PERSONNEL

The following personnel are responsible for activities identified in this procedure:

- project leader
- PRS database manager
- QPPL
- quality specialist
- regulatory compliance staff

- RRES-RS/ECR GIS Unit
- RRES-RS/ECR personnel
- RRES-RS deputy project director
- team leader

6.0 PROCEDURE

6.1 Read Introduction

6.1.1 Because discovery of PRSs possibly occur during the course of groundwater or surface water monitoring, internal or external environmental audits, or other activities, **RRES-RS/ECR personnel** shall verbally report evidence of emplaced waste, including suspicious soil characteristics, odor, and color, to the RRES-RS deputy project director.

Note: Evidence of “placement” of waste can include observation of the waste itself (e.g., drums, debris) as well as evidence of a “release” as defined in section 4.13.

6.1.2 The **RRES-RS deputy project director** shall ensure that PLs implement this procedure.

6.2 Identify and Report PRSs

6.2.1 The **PL** shall initiate the formal reporting of a prospective PRS by completing Part I of the form entitled Potential Release Site Assessment Report (Attachment A).

6.2.2 The **PL** shall record, at a minimum, the following on Part I of the Potential Release Site Assessment Report:

- the date the prospective PRS was discovered;
- the location of prospective PRS (e.g., TA, non-DOE property type);
- the location of the nearest building(s) or other structure(s) in the area on a site-specific map;
- the location of the nearest existing PRS(s) on a site-specific map;
- the description of the prospective PRS;
- the potential waste types and suspected constituents;
- the names of individuals and contact numbers able to provide additional information; and

- whether it is known or suspected there was routine or systematic placement of waste at the site.
- 6.3 Evaluate Potential Release Site Assessment Reports
- 6.3.1 The **PL** shall work with regulatory compliance staff designated by the Deputy Project Director to determine site reporting status by comparing the completed Potential Release Site Assessment Report to the current PRS database.
- 6.3.2 If the site is already listed in the current PRS database, the **regulatory compliance staff** shall
- complete Part II of the Potential Release Site Assessment Report form (Attachment A) to document that the reported site is recorded in the SWMU Report or PRS database; and
 - sign the form, forwarding a copy to the PL and the RRES-RS/ECR Records Processing Facility (RPF) in accordance with QP-4.4.
- 6.3.3 If the site is not listed in PRS documentation, the **PL** shall coordinate with the appropriate Facility Manager (FM) to
- review available historical records to ascertain the activities conducted at the reported site;
 - contact individuals identified on Part I of the Potential Release Site Assessment Report to obtain other pertinent information; and
 - ensure that the regulatory compliance staff receives the information reported on Part I of the Potential Release Site Assessment Report and other completed supporting documentation.
- 6.4 Verify SWMUs or AOCs
- 6.4.1 The **regulatory compliance staff** shall review the reports and supporting documentation to determine if a site visit is necessary.
- 6.4.2 The **regulatory compliance staff** shall coordinate all site visits with the appropriate FM or point of contact.
- 6.4.3 The regulatory compliance staff shall
- work with the PL to obtain clarification on the documentation submitted, if necessary;

- contact other appropriate site visitors (e.g., Health, Safety, and Radiation Protection representative[s]);
- use the decision process shown in Attachment B to determine whether the PRS is a SWMU or AOC; and
- complete Part III of the Potential Release Site Assessment Report.

6.4.4 The **regulatory compliance staff** shall note during the site visit any preliminary monitoring performed (e.g., rad. screening, health-related assessments, etc.) and attach the documentation of the results to the Potential Release Site Assessment Report.

6.4.5 The **regulatory compliance staff** shall forward all documentation back to the PL.

6.4.6 The **PL** shall provide the geographical location information to the RRES-RS/ECR GIS Unit (reference section 6.9) and submit a copy of the documentation to the cognizant FM and another copy to the RPF in accordance with QP-4.4.

6.5 Uniquely Identify SWMUs or AOCs

6.5.1 At the request of the PL, the **PRS database manager** shall assign the PRS a unique-numerical identifier.

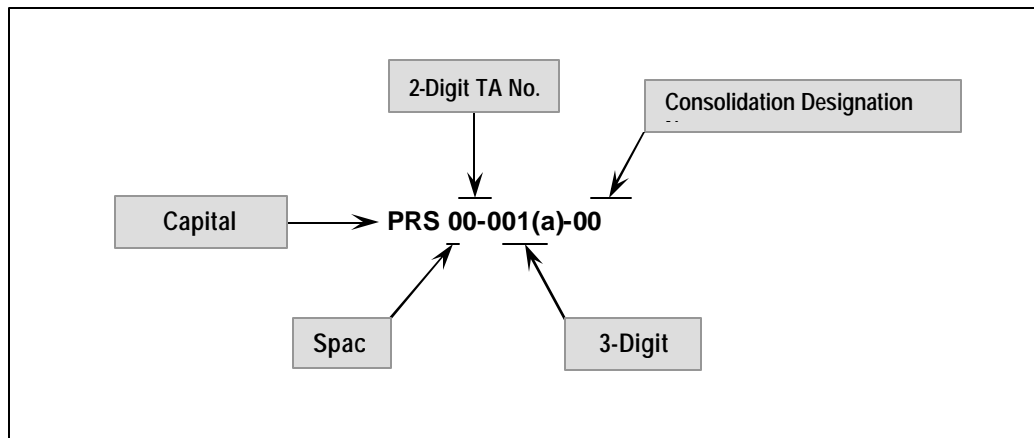


Figure 6.5-1. Proper PRS number configuration.

Note: A unique PRS number is assigned in the format “00-001” or “00-001(a)” where

- “00” is always the TA where the PRS is located within LANL;
- “001” is the sequential number; and

- “(a)” is the designator when multiple PRSs with the same description or process reside in a TA.
- Where several PRSs are consolidated, the first PRS number in the consolidated group is used as the new consolidation designation number followed by “-00” (or the most current year).

Note: SWMUs and AOCs initially listed in the 1990 SWMU Report are updated periodically in Attachment B of the IWP for the RRES-RS/ECR . The PRS database documents current information on SWMUs and AOCs. The PRS database is available at the RRES-RS/ECR internal homepage on the Web at <http://erinternal.lanl.gov/>.

6.6 Report Newly Identified SWMUs to DOE and NMED

6.6.1 When the PRS is uniquely identified and confirmed as a SWMU, the **regulatory compliance staff** shall prepare a letter to the NMED Hazardous Waste Bureau (HWB), in accordance with QP-4.10, that confirms the identification of a newly-identified SWMU.

6.6.2 The **regulatory compliance staff** shall ensure that the NMED-HWB letter identifies proposed corrective actions for the SWMU (e.g., additional investigation) and a schedule for these actions.

Note: The RRES-RS deputy project director and the DOE-LASO project manager sign this letter. DOE-LASO must receive the letter within five days of completing the checklist in order to ensure LASO concurrence and the receipt by the AA of written notification within 15 calendar days of determination that the site is a newly-identified SWMU.

6.6.3 The **regulatory compliance staff** shall compile a summary report of newly-identified SWMUs for inclusion in the next update of the IWP.

6.6.4 The **regulatory compliance staff** shall forward all correspondence received from DOE or NMED concerning the SWMU to the PL, the PRS database manager, and the appropriate FM.

6.7 Report Newly Identified AOCs to DOE

6.7.1 When the PRS is uniquely identified and confirmed as an AOC, the **regulatory compliance staff** shall prepare a

letter to DOE, in accordance with QP-4.10, that confirms the identification of a newly-identified AOC.

- 6.7.2 The **regulatory compliance staff** shall ensure that the letter identifies proposed corrective actions for the AOC and a schedule for these actions.
- 6.7.3 The **regulatory compliance staff** shall compile a summary report of newly-identified AOCs for inclusion in the annually updated IWP.
- 6.7.4 The **regulatory compliance staff** shall forward all correspondence received from DOE concerning the AOC to the PL, the PRS database manager, and the appropriate FM.

6.8 Notify the LANL Public Affairs Office

The **regulatory compliance staff**, coordinating with RRES's outreach staff, shall notify the LANL Public Affairs Office about the confirmation of a SWMU or AOC on the property of

- a private homeowner,
- Los Alamos County,
- Santa Fe County,
- the U.S. Forest Service,
- a pueblo,
- the Department of the Interior,
- the National Parks Service,
- the Bureau of Land Management, or
- other non-DOE sites.

Note: For SWMUs, perform this notification in conjunction with reporting requirements described in section 6.6.

6.9 Maintain SWMU or AOC Documentation

The **PRS database manager** shall ensure to update of the PRS database with the PRS identification as a SWMU or AOC.

Note: Accomplish this by summarizing the pertinent information identified on the completed Potential Release Site Assessment Report and entering the information into the PRS database.

6.10 Map SWMUs or AOCs

Using the best available information, the **PL** with assistance from the RRES-RS/ECR GIS Unit shall identify the geographic extent of each SWMU or AOC (refer to Attachment C for examples).

Note: The purpose of mapping PRSs is to delineate the geographic extent of the potential contamination of a site. This facilitates the characterization and remediation of sites and allows easy visualization on a map of the information about the PRS and associated data.

6.11 Electronically Capture PRS Extent

6.11.1 The **PL** shall submit a work request to the RRES-RS/ECR GIS Unit for electronic capture of the PRS extent—based on the information made available by means of section 6.9 above.

Note: The intent is to capture the PRS outline at a precision consistent with the accuracy of the data. Data accuracy should be commensurate with current knowledge and with the level and degree of contamination.

6.11.2 The **PL** shall convey the delineation of a PRS to the cartographic laboratory in one of the following three ways:

- 1) Provide an outline, using a fine line, drawn on a RRES-RS/ECR GIS map in good condition.
- 2) Provide an electronic file that contains coordinates of the boundary of the PRS. The coordinate-projection information must accompany the file in some manner. The projection information would include projection name (e.g., State plane), units (e.g., feet), datum (e.g., NAD83), and depending on the projection, other projection parameters (e.g., zone, central meridian, etc.). Contact RRES-RS/ECR GIS Unit personnel for assistance with projection information and/or supported formats. Either e-mail or deliver the file on a 3.5" disk.
- 3) Provide a description or depiction relative to some known feature in the RRES-RS/ECR GIS spatial database. For example, a circle, 10-ft in diameter, 20° south and 15° east (specify magnetic or grid north) of the southwest corner of Building G-013; or a 10-foot

buffer around a designated sewer line that exists in the database.

Note: The intent should be to capture the PRS outline at a precision consistent with the accuracy of the data. Ensure that data accuracy is commensurate with current knowledge and with the level and degree of contamination. Contact the RRES-RS/ECR GIS Unit if you have any questions.

7.0 LESSONS LEARNED

- 7.1 Before performing work described in this QP, **RRES-RS project participants** should go to the Department of Energy Lessons Learned Information Services home page, located at <http://www.tis.eh.doe.gov/II/II.html>, and/or to the LANL Lessons Learned Resources web page, located at http://www.lanl.gov/projects/lessons_learned/, and search for applicable lessons.
- 7.2 During work performance and/or after the completion of work activities, **RRES-RS project participants**, as appropriate, shall identify, document, and submit lessons learned in accordance with the LANL, Lessons Learned System located at http://www.lanl.gov/projects/lessons_learned/.

8.0 RECORDS

The **regulatory compliance staff** shall submit the following records to the Records Processing Facility, in accordance with QP-4.4, "Record Transmittal to the Records Processing Facility:

- notification letters to the DOE and NMED
- Potential Release Site Assessment Report form
- other supporting documentation

9.0 REFERENCES

To implement properly this QP, **RRES-RS/ECR personnel** should become familiar with the contents of the following documents, located at http://erinternal.lanl.gov/home_links/Library_proc.shtml:

- Quality Management Plan
- QP-2.2, "Personnel Orientation and Training"
- QP-3.4, "Corrective Action Process"

- QP-4.1, “Quality Procedure Development”
- QP-4.4, “Record Transmittal to the Records Processing Facility”
- QP-4.5, “Document Control”
- QP-4.10, “Document Development and Approval Process: Peer Review Not Required”

10.0 ATTACHMENTS

The **RRES-RS/ECR participant** who uses this QP may locate all forms associated with this procedure at

<http://erinternal.lanl.gov/Quality/user/forms.asp>.

Attachment A: Potential Release Site Assessment Report form, 3 pages

Attachment B: Decision Process for Determining Whether a Newly-identified PRS is a SWMU or AOC, 1 page

Attachment C: Example of Mapped SWMU, 1 page

Attachment D: List of Acronyms

[Using a token card, click here to record "self-study" training to this procedure.](#)

If you do not possess a token card or encounter problems, contact the RRES-ECR training specialist.

Attachment A: Potential Release Site Assessment Report

(Return Incomplete forms to the Project Leader.)

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Part I: Potential Site (Completed by Project Leader [PL])

Date discovered: _____ Technical Area where potential release site located TA-____
Engineering structure number: _____ Location of nearest structure(s): _____

Description of structures and area (e.g., size of drums, surface area, depth): _____

Other supporting information (i.e., indicate historical records referenced, including photographs, personnel to contact, and phone numbers). Identify where information exists: _____

State period of operation: from: _____ to: _____

Does the site intersect on private property? Yes No Uncertain (describe): _____

What type of unit or area is the PRS? (Circle one or more options from the list on the following page.)

Do solid wastes exist at site? Yes No Unknown

If yes, indicate the waste types by circling one or more of the options provided below:

hazardous high explosive mixed PCBs petroleum product (identify): _____
radioactive sanitary solid unknown

List suspected constituent(s), if known: _____

Was there a routine or systematic release? Yes No Unknown

Was this only a one-time release? Yes No Unknown

Is the unit or area used for product storage? Yes No

If yes, name the product(s) below:

PL Signature: _____ Date: _____

(Forward form to the regulatory compliance staff designated by the Deputy Project Director to determine if the site was previously reported.)

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Attachment A: Potential Release Site Assessment Report

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List of PRS Types

aboveground tank	capacitors	container storage
drop tower	facility/equipment	firing range
firing site	gaseous effluent treatment	impact area
incinerator	landfill	magazine
material disposal area	nonintentional release	open burning
open detonation area	operational release	outfall
physical/chemical treatment unit	sediment trap	septic system
soil contamination	spill	storage area
subsurface liquid disposal	sump	surface disposal
surface impoundment	thermal treatment unit	transformer
underground tank	waste line	waste pile
wastewater treatment facility		

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Attachment A: Potential Release Site Assessment Report

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Part II: PRS Reporting Status (Completed by the Regulatory Compliance staff designated by the Deputy Project Director.)

Was the PRS previously reported (i.e., listed in a SWMU Report or the PRS database)?

Yes No Uncertain

If yes: PRS No. No action required*

Signature: _____

Date: _____

Part III: Independent Verification (Completed by Regulatory Compliance staff.)

Is a site visit needed? Yes No

Date site visited: _____

Visited by: _____
(print name) (phone number) (print name) (phone number)

(print name) (phone number) (print name) (phone number)

Is the site monitored? Yes No If yes, attach signed screening documentation.

Nonconcurrency, no further action required (state reason): _____

Confirmed discovery SWMU AOC

Confirmed with modifications to Part I: _____

State action required (e.g., coordinate with C&O Team) and reason for action: _____

PL Signature: _____ Date: _____

Part IV: Unique Identifier (Completed by the PRS database manager.) **

SWMU number assigned: _____ Associated FU: _____ Associated OU: _____

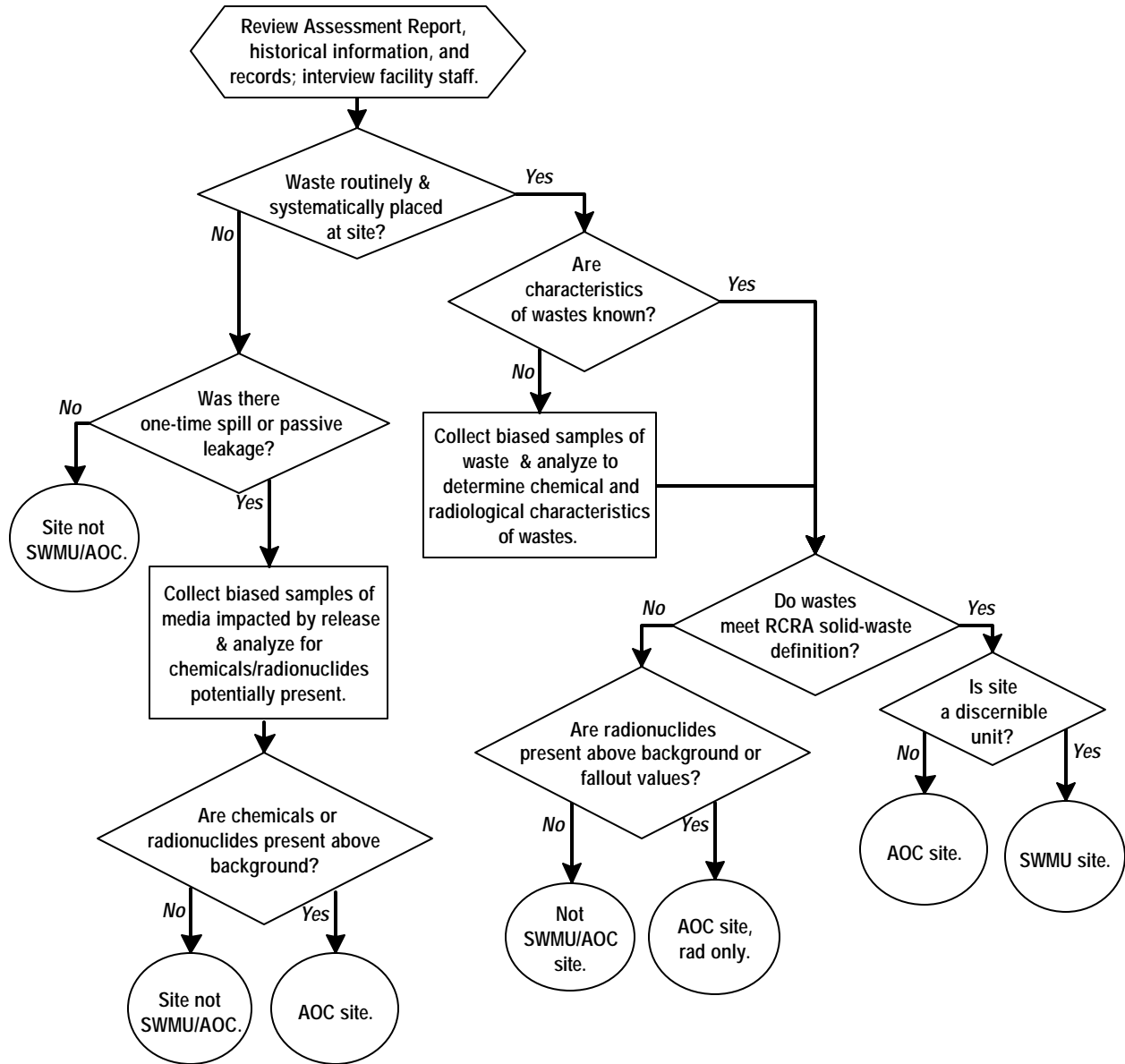
* Send report to the originator and RPF.

** Regulatory compliance staff forwards this form and all appropriate supporting documentation to the RPF and the PL. (As appropriate, use this completed form as an attachment to the DOE/NMED notification letter.)

QP-5.8, R1

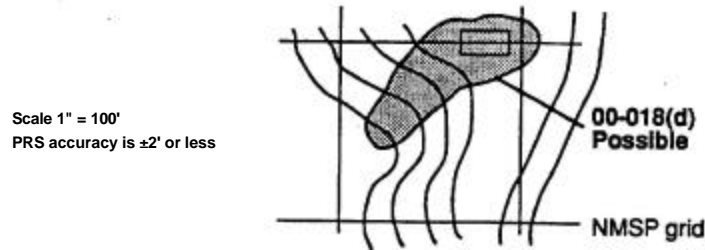
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Attachment B: Decision Process for Determining Whether a Newly-Identified PRS Is a SWMU or AOC

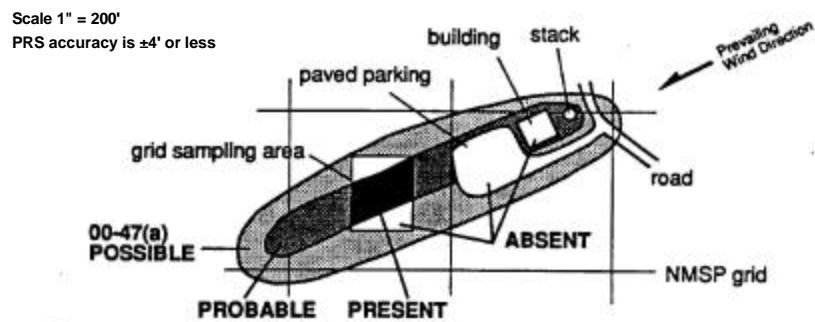


Attachment C : Example of a Mapped SWMU

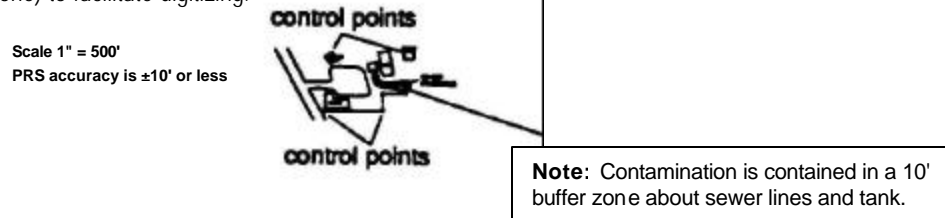
Example 1: The only information available is the maximum possible extent of the contamination. Information is hand-plotted on the base map provided by the RRES-RS/ECR GIS Unit. Digitizing precision is $\pm 2'$ or less.



Example 2: More detailed information about soil contamination from stack emission is known. Sampling has positively identified contamination or lack of contamination in some areas. In this case, soil contamination cannot occur where facilities (building, stack, parking lot, road) are located. Digitizing precision is $\pm 4'$ or less.



Example 3: Information available about possible contamination in a sewer line at former building G-013, which is shown on an old engineering drawing without NMSP grid. Digitizing precision is $\pm 10'$ or less. The person who reported the PRS identified four control points; these are fixed, clear landmarks that exist both on the old drawing and in the present electronic database. This person also provided a note that explains the nature of the contamination (10' buffer zone) to facilitate digitizing.



Note: Ten foot (10') precision can be maintained in digitizing this map. However, a larger-scale map is preferable for digitizing.

Attachment D: List of Acronyms

AOC	area of concern
DOE	Department of Energy
DOE-LASO	Department of Energy—Los Alamos Site Office
HWB	Hazardous Waste Bureau
GIS	geographic information system
LANL	Los Alamos National Laboratory
NMED	New Mexico Environment Department
PRS	potential release site
QII	Quality Improvement and Integration Team
QPPL	quality program project leader
RCRA	resource conservation and recovery act
RFI	RCRA facility investigation
RPF	Records Processing Facility
RRES-RS	Risk Reduction and Environmental Stewardship—Remediation Services
SWMU	solid waste management unit