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Chemical Inventory Limits for Investigation, Remediation, and Restoration of Material Disposal Area B Nuclear Environmental Site

Prepared by the Environmental Stewardship–Environmental Remediation and Surveillance Division

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January 2006

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1.0 INTRODUCTION

Los Alamos National Laboratory (LANL, or the Laboratory) document LA-UR-05-XXXX, "Documented Safety Analysis for Investigation, Remediation, and Restoration of Material Disposal Area B Nuclear Environmental Site" (LANL 2006), identified the development of an Above-Ground Material Management Plan as a technical safety requirement (TSR) specific administrative control (SAC). Inventory limits specified by the Above-Ground Material Management Plan will mitigate the consequences in the event of an accidental release of a hazardous material/substance during the investigation, remediation, and restoration (IRR) of Material Disposal Area (MDA) B. This report provides the methodology used to develop chemical inventory limits for MDA B IRR and identifies those limits for a subset of chemicals. Additionally, the methodology described in this report will be used by field personnel to determine inventory limits for those chemicals identified during MDA B IRR that are not evaluated by this report.

Waste inventory information for MDA B is anecdotal. The Laboratory did not maintain waste inventory records during the active disposal life of this area (1945 to 1948). Therefore, while subject matter experts (SMEs) generated a list of contaminants of concern (CoCs) using historical documentation, investigation and characterization activities are necessary before the Laboratory will know the exact contents of MDA B. As such, inventory limits identified by the Above-Ground Material Management Plan will be applicable only to those chemicals (liquids and gases) staged/stored in the Definitive Identification Facility (DIF) and the surrounding storage/staging area (327 m from the maximally-exposed offsite individual [MEOI]) that the Laboratory has fully characterized. Field personnel will rely upon post-excavation containment (e.g., overpacking, cylinder coffins, etc.) and good work practices (as described by the Above-Ground Material Management Plan) to ensure the safety of the public, workers, and the environment during work within the excavation enclosure, during onsite transportation, and during work with unidentified hazardous materials/substances.

The primary consideration in the development of chemical inventory limits is to ensure no irreversible or other serious health effects or symptoms to the public at the nearest site boundary. Therefore, chemical inventories will be limited to the quantity of material that, given a chemical spill or release, will not meet or exceed 60-minute Acute Exposure Guideline Level 2 (AEGL-2), Emergency Response Planning Guideline 2 (ERPG-2), or Temporary Emergency Exposure Level 2 (TEEL-2) airborne concentration limits at the site boundary. In accordance with "AEGLs, ERPGs, or Rev. 21 TEELs for Chemicals of Concern 2005" (Craig 2005), AEGL values (final or interim) will be used to determine inventory limits, when available. In the absence of AEGL values, analysts will reference ERPG values. TEEL values will be used when no AEGL or ERPG values exist for a given chemical. Analysts will use the threshold quantities given by 29 CFR 1910.119 (Appendix A, List of Highly Hazardous Chemicals, Toxics, and Reactives) and 40 CFR 68.130 (Tables 1 and 2, List of Regulated Toxic Substances and Threshold Quantities for Accidental Release Prevention; Tables 3 and 4, List of Regulated Flammable Substances and Threshold Quantities for Accidental Release Prevention) in lieu of the quantities calculated based on AEGL/ERPG/TEEL-2 limits when the threshold quantities are more restrictive. Storage limits for flammable and combustible liquids and hazardous and toxic gases as specified by LIR 402-510-01, "Chemical Management," will take precedence over the limits identified in this report when they are more restrictive.

2.0 METHODOLOGY

An initial list of chemicals was developed using the CoC list provided in the documented safety analysis (DSA) (LANL 2006), the results of the pore gas and surface sampling conducted in 1998 and 2001 (LANL 2004), and a general list of volatile organic compounds (VOCs). Analysts identified a subset of this list for

inventory control. Analysts established inventory limits for those chemicals that the Laboratory may find in a readily dispersible form in MDA B. Liquids and gases were considered if they have a vapor pressure (VP) greater than 0.5 mm Hg and/or a boiling point (BP) less than 100°C. Chemicals normally found in a solid form were not analyzed. Although particles smaller than about 10 μ m in diameter are respirable, a liquid or gas is expected to have greater consequences in terms of area of impact and time urgency. This criterion ensures that the analysis included those chemicals that may pose a high vaporization/dispersion hazard and is consistent with the chemical accident screening used in DOE/EIS-0238, "Site-Wide Environmental Impact Statement for Continued Operation of the Los Alamos National Laboratory" (DOE 1999).

Analysts used two separate air dispersion models to determine the inventory limit for a given chemical of concern: Areal Locations of Hazardous Atmospheres (ALOHA) Version 5.3.1 and Emergency Prediction Information Code (EPIcode) Version 7.0.

ALOHA is a public domain code that is part of a system of software known as the Computer-Aided Management of Emergency Operations (CAMEO), which was developed to plan for and respond to chemical emergencies. It is also widely used throughout the Department of Energy (DOE) complex for safety analysis applications. The Environmental Protection Agency (EPA), through its Chemical Emergency Preparedness and Prevention Office (CEPPO), and the National Oceanic and Atmospheric Administration (NOAA) Office of Response and Restoration jointly sponsor ALOHA. EPIcode was developed by Homann Associates, Inc., which maintains and upgrades the code. Homann Associates, Inc. developed EPIcode to automate the implementation of the EPA 'Green Book' guidance regarding dispersion of hazardous chemicals. The DOE Office of Environment, Safety, and Health designated both ALOHA and EPIcode as DOE "toolbox" codes. DOE-EH-4.2.1.3-ALOHA Code Guidance (DOE June 2004a) and DOE-EH-4.2.1.3-EPIcode Code Guidance (DOE June 2004b) provide detailed descriptions of the software and DOE-recommended guidance for use of the software in safety analysis applications.

ALOHA and EPIcode are well-developed computer models that are capable of calculating χ/Q values with the weather conditions provided, such as stability class, temperature, wind speed, and distance from release. These codes use a centerline Gaussian-dispersion plume model to represent chemical releases that are neutrally buoyant. ALOHA will also model heavy gas releases.

ALOHA and EPIcode use the Gaussian model to predict how gases that are about as buoyant as air will disperse in the atmosphere. Such "neutrally-buoyant" gases have about the same density as air. According to this model, wind and atmospheric turbulence are the forces that move the molecules of a released gas through the air, so as an escaped cloud is blown downwind, "turbulent mixing" causes it to spread out in the crosswind and upward directions. According to the Gaussian model, any crosswind slice of a moving pollutant cloud looks like a bell-shaped curve, high in the center and lower on the sides.

"Heavy gases" form vapor clouds that are heavier and denser than air. Heavy gases include not only gases with molecular weights heavier than air (the average molecular weight of air is about 29 kg/kmol), but sometimes also gases such as anhydrous ammonia that are normally lighter than air, but that are stored liquefied under pressure. Liquefied gases typically escape from storage as a cold, heavy cloud containing a mixture of gas and fine aerosol droplets. A release of such a mixture is called a two-phase flow. The aerosols weigh the cloud down and make it more dense, and their evaporation cools the cloud.

Heavy gases behave in a complicated way when they escape from storage. A heavy gas cloud first slumps away from the source in all directions, then flows downwind like water, propelled by the wind, gravitational slumping, and its forward momentum. As it moves downwind, air is stirred into the cloud, and it becomes less and less dense, eventually behaving like a neutrally buoyant gas.

The basis for identifying the potential for heavy gas effects is the Richardson (Ri) number. The Ri number represents a relative measure of the potential energy of the cloud with respect to the mechanical turbulent energy of the atmosphere. The source Ri (Ri_o) number, above which heavy gas transport effects are assumed important, is typically considered about 50 (Hanna, 1996). An absolute threshold value does not actually exist. Heavy gas effects may begin to appear for Ri_o values as low as one and become more pronounced as Ri_0 is increased. ALOHA uses a critical Ri_0 value of one.

ALOHA's heavy gas model typically (as seen in this analysis) produces results that allow for a much higher inventory limit than those produced by EPIcode. Other analyses have used the results of ALOHA when heavy gas transport and dispersion are characteristic, since EPIcode does not have a heavy gas model. However, due to the lack of an absolute threshold value for the Ri_o number and the tendency for heavy gas releases to transition to a neutrally buoyant plume, analysts chose the more conservative results of the two models (typically EPIcode) to set the inventory limits for MDA B IRR.

2.1 Input Parameters

Table 2.1-1 provides the basic input parameters used to run ALOHA and EPIcode. All releases are assumed to take place outdoors. No credit is taken for confinement structures or ventilation/filtration. Following sections provide the specific input parameters used to model liquid spills and gaseous releases.

Input Parameter	EPIcode	ALOHA	Justification
Source Location/ Site Data	Lat: 34.00879 N Long: 106.44313 W Source Altitude: 2069 m (6789 ft)	Los Alamos, NM Lat: 35° 31.2 min N Long: 106° 11.4 min W Elevation: 2069 m (6789 ft)	Latitude, longitude, and altitude are input into EPIcode; specific latitude, longitude, and elevation information is provided by ALOHA when Los Alamos, NM is chosen by the user.
Building Type	N/A	Default is sheltered single story	Not applicable to this analysis-receptor is conservatively located outside.
Date and Time	N/A	June 30, 2005; 0600 hours MDT	ALOHA uses a number of parameters, including date and time, to determine the evaporation rate; these parameters must also be consistent with the desired atmospheric stability class. The date and time have been selected to ensure the recommendation of Stability Class F.
Terrain/Ground Roughness	Standard (rural)	Open Country (rural)	Rural terrain is chosen for conservatism. EPIcode's rural model produces concentrations approximately 10 times greater than its urban model; ALOHA's rural model produces concentrations approximately 3 times greater than its urban model.
Atmospheric Stability Class	F	F	Atmospheric Stability Class F is conservatively chosen to represent unfavorable, worst-case

Table 2.1-1 Input Parameters for EPIcode and ALOHA

Input Parameter	EPIcode	ALOHA	Justification
			conditions.
Cloud Cover	N/A	Clear (0 tenths)	ALOHA primarily uses the cloud-cover input to estimate the amount of incoming solar radiation that is incident upon the puddle formed by a liquid spill (cloud cover is expected to also have an effect at night on the long wave radiation calculations and therefore a small effect on evaporation). Zero tenths cloud cover is conservative and consistent with the selection of Atmospheric Stability Class F.
Wind Speed/ Measurement Height	1.5 m/s at 10 m	1.5 m/s at 10 m	1.5 m/s at 10 m is the DOE-recommended wind speed and conservative reference height for use with Stability Class F (DOE June 2004a; DOE June 2004b). Thoman, et. al., further demonstrates the conservatism of choosing a reference height of 10 m (as opposed to the 2 m default for EPIcode and 3 m default for ALOHA) (Thoman, et. al. 2005).
Wind Direction	Any direction	Any direction	Downwind concentration results are not sensitive to this input parameter specification.
Inversion Height	200 m	200 m	200 m has been conservatively chosen to ensure the worst- case downwind concentrations are represented-the lower the inversion height, the higher the downwind concentration.
Temperature	32.2°C	32.2°C	95 th percentile value of a five-year record of

Table 2.1-1 Input Parameters for EPIcode and ALOHA

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Input Parameter	EPIcode	ALOHA	Justification
			daily high temperatures for Los Alamos (measurements) obtained from TA-53 monitoring station- 10/31/00 to 10/30/05).
Humidity	N/A	50%	50% is the DOE- recommended value (DOE June 2004a). This value is used to calculate the evaporation rate only. ALOHA does not model chemical reactions resulting from moisture.
Release Height	0 m (ground-level release)	0 m (ground-level release)	All release scenarios assume a ground-level release.
Receptor Height	0 _m	0 m (only option)	A receptor height of 0 m is most appropriate and conservative for a ground-level release (DOE June 2004b).
Deposition Velocity	0 cm/s	0 cm/s (only option)	Plume depletion is conservatively not considered given the close proximity of the MEOI.
Airborne Fraction	1.00	N/A	All of the material involved is conservatively assumed to be released to the atmosphere.
Sample/Averaging Time	10 minutes	3 minutes (only option)	Default values; these low sampling/averaging times are conservative as they provide for higher downwind concentrations.
Dispersion Model	Gaussian	Gaussian and Heavy Gas, as applicable	EPIcode uses the Gaussian model only; ALOHA decides the most appropriate of the Gaussian and Heavy Gas model to use for a given chemical.

Table 2.1-1 Input Parameters for EPIcode and ALOHA

2.1.1 Puddle Source/Liquid Spill

Analysts chose ALOHA's puddle source model and EPIcode's liquid spill model to model the release of chemicals in a liquid form. These two models assume that the total inventory of a specified chemical has spilled onto the ground and has formed one puddle or pool that has a uniform depth and is not changing in area. Catastrophic failure of a storage vessel is an example of a scenario that could quickly progress to a puddle source or liquid spill configuration. The source term is proportional to the pool surface area, which is defined by the presence of a berm (or similar type barrier) or by assuming that the liquid spreads to some uniform thickness (e.g., 1 cm).

ALOHA (EPA/NOAA 2004)

ALOHA's puddle source model can model evaporation from puddles that are boiling or that are cooler than the boiling point of the liquid that they contain. To model evaporation from a puddle, ALOHA accounts for the effects of wind speed, atmospheric turbulence, air temperature and pressure, viscosity, and other properties of the spilled chemical. It accounts for the effects on puddle temperature of solar heating, evaporative cooling, and several other ways in which heat is exchanged between a puddle and its environment. For example, on a sunny day, ALOHA will expect heat energy from the sun to warm the puddle. It expects puddle temperature to directly influence evaporation rate so that the higher the puddle temperature, the faster the evaporation rate. It accounts for changes in puddle temperature and hence in evaporation rate over time. The types of heat transfer that ALOHA expects to affect puddle temperature fall into the following three categories:

- incoming solar radiation (affected by location, time and date, and cloud cover),
- heat transfer with the air (affected by air temperature, humidity, and initial puddle temperature), and
- heat transfer with the ground (affected by ground temperature, ground type, and initial puddle temperature).

The puddle source model requires the following specific inputs in addition to those given in Table 2.1-1:

- puddle area or diameter;
- volume, mass, or depth of the puddle;
- ground type;
- ground temperature; and
- initial puddle temperature.

The puddle area/diameter and the volume/mass/depth of the puddle characterize the quantity of the chemical spilled and provide the physical dimensions of the puddle or pool that are necessary for the evaporation calculation. Analysts determined the surface area of a spilled chemical using the following equation:

$$
A = V/\Delta h
$$

 $(Equation 2.2-1)$

where, A is the surface area of the puddle, V is the volume of the puddle (or total amount of material spilled), and ∆h is the depth of the puddle. The purpose of this anaylsis was to determine the maximum quantity of a specified chemical that will not meet or exceed AEGL/ERPG/TEEL-2 at the site boundary. Therefore, analysts estimated the volume of the puddle until a quantity was identified that yielded a concentration just less than the AEGL/ERPG/TEEL-2 threshold for the chemical modeled. The DOE code guidance for ALOHA (DOE June 2004a) recommends a puddle depth (∆h) of 1 cm, a depth that is commonly used and suggested by EPA guidance. Therefore, analysts used a puddle depth of 1 cm for this analysis.

Ground type influences the amount of heat energy transferred from the ground to an evaporating puddle. As it computes heat transfer from ground to puddle, ALOHA assumes that the ground does not absorb any of the spilled chemical. ALOHA offers four choices for ground type:

- default—unwetted soil not covered by rock or concrete;
- concrete—concrete, cement, asphalt, or otherwise paved surfaces;
- sandy—sandy, dry soil; and
- moist—sandy, moist soil.

ALOHA expects heat to be transferred most readily from a default or concrete ground into a puddle, and least readily from sandy ground. The more heat energy that is transferred into the puddle, the higher the evaporation rate and the downwind concentration. Analysts chose the default ground type (unwetted soil not covered by rock or concrete) as the most representative and conservative choice for this analysis.

ALOHA uses ground temperature to predict the amount of heat transferred from the ground to an evaporating puddle. The warmer the ground relative to the temperature of the puddle, the more heat energy will be transferred into the puddle, and the faster the puddle will evaporate. The DOE code guidance for ALOHA (DOE June 2004a) recommends a specification based on statistical analysis of measurements of ground surface temperature, and when such data is not available, the ground temperature should be set equal to the air temperature. Analysts conservatively set the ground temperature equal to the air temperature (32.2°C) for this analysis.

To predict the rate of evaporation from a puddle of spilled liquid, ALOHA must know the initial temperature of the puddle. It assumes the initial temperature to be the same throughout the depth and width of the puddle. The DOE code guidance for ALOHA (DOE June 2004a) recommends that the initial puddle temperature be consistent with the storage/operating temperature or the ambient temperature. Therefore, analysts assumed that the initial puddle temperature was equal to the air/ground temperature. The initial puddle temperature must be above the liquid's freezing point (ALOHA cannot predict sublimation rate from a frozen puddle) and equal to or less than the liquid's ambient boiling point.

EPIcode (Homann Associates, Inc. 2003)

EPIcode's liquid spill model is not as complex as ALOHA's puddle source model. EPIcode's evaporation methodology is based on an EPA model (EPA 1987) and considers the windspeed, molecular weight of the spilled material, surface area of the spilled material, vapor pressure of the spilled material at a given temperature, and the temperature of the spilled material. For liquid spill scenarios, EPIcode prompts the analyst for inputs of total quantity of liquid that is spilled, surface area of pool that forms from the spill (calculated by EPIcode), the chemical vapor pressure (calculated by EPIcode), and the liquid temperature. From these inputs, EPIcode calculates the evaporative release rate to the atmosphere and the duration of the release.

As with the ALOHA model, analysts estimated the total quantity of liquid spilled until a quantity was identified that yielded a concentration just less than the AEGL/ERPG/TEEL-2 threshold for the chemical modeled. Once the analyst specifies a quantity, EPIcode provides three possible spill areas—one based on a 1 cm pool depth, one based on a 1 mm pool depth, and one based on a 1 in. pool depth. For an unmitigated analysis, as with ALOHA, the DOE code guidance for EPIcode (DOE June 2004b) recommends that a minimum depth of 1 cm be specified.

The evaporation rate is directly proportional to the chemical vapor pressure, and the vapor pressure of the chemical constituent is a strong function of its temperature in the liquid state. EPIcode typically provides the vapor pressure at a given temperature (e.g., 25°C) for each chemical. EPIcode recalculates the vapor pressure based on the specified spill temperature. The DOE code guidance for EPIcode (DOE June 2004b) recommends that the analyst first consider the range of possible liquid temperatures, consistent with the storage/operating temperature or the environment temperature, and then specify the spill temperature. As with the ALOHA model, analysts conservatively set the spill temperature equal to the air/environment temperature (32.2°C) for this analysis.

Very small particles and gases or vapors are deposited on surfaces as a result of turbulent diffusion and Brownian motion. Chemical reactions, impaction, and other biological, chemical, and physical processes combine to keep the released substance at ground level. As this material is deposited on the ground, the plume above becomes depleted, and downwind concentrations are lower than would be the case without plume depletion. EPIcode uses a source-depletion algorithm to adjust the air concentration in the plume to account for this removal of material. The deposition velocity input determines plume depletion. The most conservative results are generally obtained with the deposition velocity set to zero; however, this assumption could lead to unrealistically large concentration predictions for particles, particularly at large distances downwind. The DOE code guidance for EPIcode (DOE June 2004b) recommends the default values of 0 cm/s for gases and vapors and 0.3 cm/s for solids, although other values may be used with justification. Due to the close proximity of the MEOI, analysts conservatively assumed a deposition velocity of 0 cm/s for liquid spills.

Additional input parameters include the airborne fraction and the physical height of the spill. Analysts conservatively assumed the airborne fraction, the fraction of the total quantity of material involved in the spill that is released to the atmosphere, to be 1.00. For MDA B IRR activities, the physical height of a chemical spill will be 0 m.

2.1.2 Gaseous Release

Analysts chose ALOHA's direct source model and EPIcode's term release model to model the release of chemicals in a gaseous form.

ALOHA (EPA/NOAA 2004)

The direct source model is used when the emission rate of a gas is known. The emission rate remains constant throughout the duration of the release. A continuous (lasting more than one minute) or instantaneous release (lasting one minute) may be chosen. For the purposes of this analysis, analysts modeled all gases as a continuous 10-minute release. This is consistent with modeling performed for the LANL site-wide environmental impact statement (DOE 1999). As for the liquid spill, analysts estimated the total quantity of gas released until a quantity was identified that yielded a concentration just less than the AEGL/ERPG/TEEL-2 threshold for the chemical modeled. Analysts assumed a ground-level release, so the source height was set to 0 m.

EPIcode (Homann Associates, Inc. 2003)

EPIcode defines a term release as a release that is of finite duration. As the release duration increases, the results from the term-release model approach that from the continuous release model for equivalent specifications of release rates and other input variables. At the other end of the spectrum for term releases (i.e., releases of very short duration) is the instantaneous release. When the user specifies an instantaneous term release, EPIcode uses the puff model. For other term releases (i.e., noninstantaneous), EPIcode automatically selects the puff or plume equation at each downwind location based on the relative dimension of the cloud width with respect to the cloud length. When the cloud length is less than the cloud width, the puff equation is considered a more accurate model of the dispersion.

As with ALOHA, analysts modeled all gases as a continuous 10-minute release and estimated the total quantity of gas released until a quantity was identified that yielded a concentration just less than the AEGL/ERPG/TEEL-2 threshold for the chemical modeled. The effective release height was set to 0 m. Analysts conservatively assumed the airborne fraction to be 1.00. No plume depletion was credited, and the deposition velocity was set to 0 cm/s.

3.0 CHEMICAL INVENTORY LIMITS

Tables 3.0-1 through 3.0-5 provide the inventory limits at 327 m identified through modeling for each of the chemicals analyzed. The chemicals are presented based on their Department of Transportation (DOT) hazard class. Appendix B provides the results of the modeling for both ALOHA and EPIcode. Modeling was performed at various distances and for both AEGL/ERPG/TEEL-2 and -3 to accommodate changes that may occur during the MDA B IRR planning phase. An activity or facility with greater than 100,000 lbs of a hazardous material/substance is considered to be in a production mode. Therefore, any limits identified at greater than 100,000 lbs were set at 100,000 lbs.

^a10% LEL ≤ AEGL/ERPG/TEEL < 50% LEL; safety considerations against the hazard(s) of explosion(s) must be taken into account

Chemical	Form	CAS No.	Limit (lbs)-327 m
1,1-Dichloroethane	Liquid	75-34-3	13,100
1,1-Dichloroethylene (also Vinylidene Chloride)	Liquid	75-35-4	26
1,2,4-Trimethylbenzene	Liquid	95-63-6	11,500
1,2-Dichloroethane (also Ethylene Dichloride)	Liquid	107-06-2	1975
1,2-Dichloropropane	Liquid	78-87-5	1600
1,3,5-Trimethylbenzene (also Mesitylene)	Liquid	108-67-8	5600
1,3-Dichloropropane	Liquid	142-28-9	4700
2,2-Dichloropropane	Liquid	594-20-7	530
2-Butanone (also Ethyl Methyl Ketone)	Liquid	78-93-3	$20,000^a$
2-Chloroethyl vinyl ether	Liquid	110-75-8	100
2-Chlorotoluene (also O-Chlorotoluene)	Liquid	95-49-8	95,000
2-Hexanone (also Methyl Butyl Ketone)	Liquid	591-78-6	3150
4-Chlorotoluene	Liquid	106-43-4	100,000
4-Methyl-2-pentanone (also Methyl Isobutyl Ketone)	Liquid	108-10-1	7000
Acetone	Liquid	67-64-1	$10,000^a$
Acrylonitrile	Liquid	107-13-1	126
Benzene	Liquid	$71-43-2$	750
Bromobenzene	Liquid	108-86-1	3750
Carbon disulfide (also Carbon bisulfide)	Liquid	75-15-0	325
Chlorobenzene	Liquid	108-90-7	53,700
cis-1,3-Dichloropropylene (also cis-1,3-Dichloro-1- propene)	Liquid	10061-01-5	84
Ethylbenzene	Liquid	100-41-4	8900
Ethyl ether (also Diethyl ether)	Liquid	60-29-7	395
Isopropylbenzene (also Cumene)	Liquid	98-82-8	7100
m-Xylene	Liquid	108-38-3	17,500
p-Xylene	Liquid	106-42-3	16,500
n-Butylbenzene	Liquid	104-51-8	100,000
n-Propylbenzene	Liquid	103-65-1	100,000
Kerosene	Liquid	8008-20-6	6400
o-Xylene	Liquid	95-47-6	23,500
sec-Butylbenzene	Liquid	135-98-8	16,000
Styrene (also Styrene monomer)	Liquid	100-42-5	31,500
tert-Butylbenzene	Liquid	98-06-6	68,000
Toluene	Liquid	108-88-3	12,500
trans-1,2-Dichloroethylene	Liquid	156-60-5	2700
trans-1,3-Dichloropropylene	Liquid	10061-02-6	93

Table 3.0-2 Chemical Inventory Limits for DOT Class 3: Flammable and Combustible Liquids

^a10% LEL ≤ AEGL/ERPG/TEEL < 50% LEL; safety considerations against the hazard(s) of explosion(s) must be taken into account

Chemical	Form	CAS No.	Limit (lbs) -327 m
1,1,1,2-Tetrachloroethane	Liquid	630-20-6	5300
1,1,1-Trichloroethane	Liquid	$71 - 55 - 6$	5100
1,1,2,2-Tetrachloroethane	Liquid	79-34-5	775
1,2,3-Trichloropropane	Liquid	$96-18-4$	3100
1,2-Dibromoethane (also Ethylene Dibromide)	Liquid	106-93-4	3200
1,2-Dichlorobenzene (also O-Dichlorobenzene)	Liquid	$95 - 50 - 1$	47,000
1,2-Dichloroethane (also Ethylene Dichloride)	Liquid	107-06-2	1975
1,3-Dichlorobenzene (also M-Dichlorobenzene)	Liquid	541-73-1	6500
2-Chloroethylvinyl ether	Liquid	110-75-8	100
Acrylonitrile	Liquid	$107 - 13 - 1$	126
Bromochloromethane	Liquid	74-97-5	10,800
Bromoform	Liquid	$75 - 25 - 2$	300
Carbon disulfide (also Carbon bisulfide)	Liquid	$75-15-0$	325
Carbon tetrachloride	Liquid	$56 - 23 - 5$	2030
Chloroform	Liquid	67-66-3	310
Dibromochloromethane (also Chlorodibromomethane)	Liquid	124-48-1	150
Dibromomethane	Liquid	74-95-3	51
Iodomethane (also Methyl idodide)	Liquid	74-88-4	195
Methylene chloride (also Dichloromethane)	Liquid	75-09-2	1470
Tetrachloroethylene (also Perchloroethylene)	Liquid	127-18-4	18,000
Trichloroethylene	Liquid	79-01-6	7100
Trichlorofluoromethane	Gas	75-69-4	1250

Table 3.0-3 Chemical Inventory Limits for DOT Class 6: Toxic Substances and Infectious Substances

Chemical	Form	CAS No.	Limit (lbs)-327 m
Ammonium Hydroxide (10-35% ammonia; 21-72% ammonium hydroxide; water is balance)	Liquid	1336-21-6	102
Hydrogen bromide, anhydrous (also Hydrobromic acid, anhydrous)	Gas	10035-10-6	1.5
Hydrogen bromide, solution (48%)	Liquid	10035-10-6	700
Hydrogen Chloride, anhydrous	Gas	7647-01-0	5
Hydrogen chloride, solution (30-40%)	Liquid	7647-01-0	155
Hydrogen Fluoride, anhydrous	Gas	7664-39-3	3
Hydrogen Fluoride, solution (47-52%)	Liquid	7664-39-3	590
Nitric acid, anhydrous	Liquid	7697-37-2	270
Nitric acid, solution (70%)	Liquid	7697-37-2	450
Sulfur dioxide	Gas	7446-09-5	0.3

Table 3.0-4 Chemical Inventory Limits for DOT Class 8: Corrosives

Table 3.0-5

Chemical Inventory Limits for DOT Class 9: Miscellaneous Hazardous Materials

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Appendix A

Acronyms/Abbreviations and Glossary

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A-1.0 ACRONYMS AND ABBREVIATIONS

A-2.0 GLOSSARY

- AEGL-2—The airborne concentration (expressed as ppm or mg/m³) of a substance above which it is predicted that the general population, including susceptible individuals, could experience irreversible or other serious, long-lasting adverse health effects or an impaired ability to escape.
- **AEGL-3—The airborne concentration (expressed as ppm or mg/m³) of a substance above which it is** predicted that the general population, including susceptible individuals, could experience lifethreatening health effects or death.
- **ERPG-2—**The maximum concentration in air below which it is believed nearly all individuals could be exposed for up to one hour without experiencing or developing irreversible or other serious health effects or symptoms that could impair their abilities to take protective action.
- **ERPG-3—**The maximum concentration in air below which it is believed nearly all individuals could be exposed for up to one hour without experiencing or developing life-threatening health effects.

TEEL-2—Same as ERPG-2.

TEEL-3—Same as ERPG-3.

Appendix B

Modeling Results

