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Waste and Environmental Services Standard Operating Procedure

for **PREPARING SOLID WASTE MANAGEMENT UNIT
AND AREA OF CONCERN MASTER FILES**

APPROVAL SIGNATURES:

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1.0 PURPOSE AND SCOPE

The purpose of this standard operating procedure (SOP) is to delineate the responsibilities, specific requirements, and process for compiling Master Files for solid waste management units (SWMUs) and areas of concern (AOCs) at the Los Alamos National Laboratory (LANL or the Laboratory) Environmental Programs (EP) Directorate.

Master Files document the basis of regulatory decisions concerning the administration of SWMUs and AOCs by the U.S. Environmental Protection Agency (EPA), the New Mexico Environment Department (NMED), and the U.S. Department of Energy (DOE), which are referred to as the Administrative Authorities. A Master File contains all documents that support the final regulatory decision for a specific SWMU or AOC.

2.0 BACKGROUND

The EP-Waste and Environmental Services (EP-WES) Division's PRS Database Manager is responsible for maintaining and managing Project Master Files. All PRS Database personnel must follow this SOP when preparing Master Files. All EP Directorate participants involved in the investigation of SWMUs and AOCs must be familiar with this SOP.

Each SWMU or AOC must have a Master File. Each Master File contains general site information about the particular SWMU/AOC and must contain all documentation pertaining to all regulatory decisions concerning the SWMU/AOC, including documentation of field plans and field investigations, regulatory correspondence, and any other record or document of decision that leads to completion of the site and to the final decision by the Administrative Authority.

2.1 Precautions

Controlled documents and controlled data **MAY NOT** reside in Master Files (see Section 3.1, Step 2 of this SOP).

2.2 Definitions

Administrative Authority—For the Laboratory, one or more regulatory agencies, such as NMED, EPA, or the DOE, as appropriate.

Administratively Complete—(1) Prior to the March 1, 2005, signing of the Compliance Order on Consent (the Consent Order), the Administrative Authorities considered a SWMU or AOC administratively complete when it met one or more of the five no further action (NFA) criteria presented in the April 18, 1996, *Document of Understanding* and subsequently incorporated into the Laboratory's *Installation Work Plan, Revision 7* (LANL 1998, 062060). The *Document of Understanding* is a joint endeavor entered into by EPA, DOE, NMED, and Los Alamos and Sandia National Laboratories. The *Document of Understanding* contains the then-current, jointly agreed-upon programmatic approach for accomplishing the environmental restoration at the Los Alamos and Sandia National Laboratories. In addition, for SWMUs to be considered administratively complete, a modification to the Laboratory's Hazardous Waste Facility Permit also was required. (2) After the March 1, 2005, signing of the Consent Order, NMED considers a SWMU or AOC as administratively complete if all the Consent Order requirements for the site have been met and NMED issues a Certificate of Completion. In addition, for SWMUs to be considered administratively complete, a modification to the Laboratory's Hazardous Waste Facility Permit is also needed.

Area of Concern—An area at the Laboratory that may have had a release of a hazardous waste or a hazardous constituent but that is not a SWMU.

Compliance Order on Consent—For the EP Directorate, an enforcement document signed by NMED, DOE, and the Regents of the University of California on March 1, 2005, that prescribes the requirements for corrective action at the Laboratory. The purposes of the Consent Order are (1) to define the nature and extent of releases of contaminants at, or from, the facility; (2) to identify and evaluate, where needed, alternatives for corrective measures to clean up contaminants in the environment and to prevent or mitigate the migration of contaminants at, or from, the facility; and (3) to implement such corrective measures. The Consent Order supersedes the

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corrective action requirements previously specified in Module VIII of the Laboratory's Hazardous Waste Facility Permit.

Decision Document—A record containing conclusive information that supports the Administrative Authority's acceptance of a corrective action for a site.

Environmental Programs Participant—An inclusive term for any Los Alamos National Laboratory employee, staff augmentation employee, deployed worker, or subcontractor, inclusive of project leaders, team leaders, and project personnel who participate in activities conducted as part of or on behalf of the EP Directorate.

Environmental Restoration Identification Record Number (ER ID)—A unique identifier assigned by the Records Processing Facility (RPF) that identifies an archival document maintained by the RPF.

Master File—A hard-copy file containing all available general site information, regulatory history and correspondence, documentation of field investigation(s), and any other documentation of corrective action(s) for a specific SWMU or AOC that leads to completion of the site and to the final decision by the Administrative Authority.

No Further Action Criteria—Prior to the signing of the March 1, 2005, Consent Order, the following five criteria applied toward achieving NFA status for a SWMU or AOC:

- Criterion 1: The site does not exist, is a duplicate of another site, cannot be located, or is located within another site and has been or will be investigated as part of that site.
- Criterion 2: The site was never used for the management (that is, generation, treatment, storage, or disposal) of RCRA solid or hazardous wastes and/or constituents.
- Criterion 3: The site is not known or suspected of releasing Resource Recovery and Conservation Act (RCRA) solid or hazardous wastes and/or constituents to the environment. The term "release" means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous constituents) into the environment.
- Criterion 4: The site is regulated under another state and/or federal authority. If the site is known or suspected of releasing RCRA solid or hazardous wastes and/or constituents to the environment, it has been or will be investigated and/or remediated in accordance with the applicable state and/or federal regulations.
- Criterion 5: The site was characterized or remediated in accordance with applicable state and/or federal regulations, and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use.

Solid Waste Management Unit—(1) Any discernible site at which solid wastes have been placed at any time, whether or not the site use was intended to be the management of solid or hazardous waste. SWMUs include any site at a facility at which solid wastes have been routinely and systematically released. This definition includes regulated sites (i.e., landfills, surface impoundments, waste piles, and land treatment sites) but does not include passive leakage or one-time spills from production areas and sites in which wastes have not been managed (e.g., product storage areas). (2) According to the Consent Order, any discernible site at which solid waste has been placed at any time, and from which NMED determines that a risk of a release of hazardous waste or hazardous waste constituents (hazardous constituents) may exist, whether or not the site was intended to be the management of solid or hazardous waste. Such sites include any area at the Laboratory at which solid wastes have been routinely and systematically released; they do not include one-time spills.

Statement of Basis—A statement prepared by the Administrative Authority to document the final decision for a site when corrective action is completed or a remedy selection is made. The Statement of Basis is similar in purpose to the Record of Decision employed by the Superfund program to fulfill the requirements set forth under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980.

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3.0 STEP-BY-STEP PROCESS DESCRIPTION: PREPARING SWMU AND AOC MASTER FILES

This SOP provides the process for creating a Master File for all SWMUs and AOCs that have not been previously packaged into a Master File and for completing a partially assembled Master File. A Master File is a sequenced (newest to oldest) compilation of all pertinent hard copy documents (including CD or DVD) containing the information that leads to the final corrective action decision for a SWMU or AOC by the Administrative Authority. At a minimum, information contained within a Master File should be equivalent to a printout of all documents (or a combination of documents, applicable sections of documents, and CDs/DVDs) listed in the electronic PRS Database for the SWMU or AOC. A flowchart documenting the process for compiling Master Files is provided in Attachment 1.

A Master File must be created and completed for each individual SWMU and AOC even if it has been incorporated into a consolidated unit. To do so, insert three tab dividers labeled Section I–III into a file. At a minimum, the Master File must include a *Table of Contents (TOC)/Checklist*, *Section I—General Site Information*, and *Section II—Regulatory History and Correspondence*. Information for inclusion in Section II is often work in progress (such as field investigations) and should be incorporated into the Master File as soon as it becomes available. *Section III—Additional Information* is added only if information not appropriate for inclusion in Sections I or II is applicable to the SWMU or AOC.

New personnel responsible for the maintenance of but who are unfamiliar with a Master File should review and refer to an existing Master File while reading this SOP. Consult with the PRS Database Manager as to an appropriate file for review.

3.1 TOC/Checklist and Master File Documents

Each Master File must include a TOC/Checklist. A template of a Master File TOC/Checklist is included as Attachment 2. Readers should refer to Attachment 2 as they read through this SOP.

PRS Database Personnel	1. Create a TOC/Checklist <ul style="list-style-type: none"> • Access the PRS Database website at http://erinternal.lanl.gov/PRS/PRSMain.asp. • Go to the appropriate SWMU or AOC, and click on the <i>Documents</i> link at the bottom of the page. When the Documents page appears, click on the <i>Decision Documents</i> link located above the documents table. A prompt will appear to SAVE or OPEN the file in Excel spreadsheet format. After selecting one of these options, return to the documents page and click on <i>Link to TOC/Checklist for Master Files</i>. A second prompt will appear to SAVE or OPEN the file. After selecting one of these options, the TOC/Checklist form will appear on the screen. Save it to your computer and fill it out using the decision document list to provide titles and ER ID numbers. Mark all columns that apply with an X or a check mark (√). Insert the TOC/Checklist at the front of the Master File. • If any category of Master file contents is unavailable (e.g., no photographs exist, no field work was performed, no other decision documents exist, etc.), mark the TOC/Checklist column labeled <i>Not Applicable</i> with an X or a check mark (√).
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2. Copy each of the documents listed on the Master File TOC/Checklist in full or include a full copy of the document on a CD/DVD. If the document is lengthy and applies to multiple SWMUs/AOCs (such as a RCRA facility investigation [RFI] work plan), only each applicable part needs to be copied and included in the Master File. As documents are inserted into the Master File, mark the appropriate TOC/Checklist format column (i.e., *Entire Document*, *Applicable Pages Only*, or *CD/DVD*) with an X or a check mark (✓).

NOTE: The person who assembles the Master Files (Master File compiler) must use judgment as to when a document is appropriate to include only applicable parts.

- If providing only applicable parts, include a copy of the document's cover page and TOC along with all pertinent pages that provide information on the SWMU or AOC.
- If providing a CD/DVD, label the CD/DVD with the title and the ER ID number of the document included on the CD. Provide the location of the CD/DVD (i.e., in the Master File or elsewhere).
- If a document to be included in a Master File does not have an ER ID number, check with the RPF to determine if it is a recent submittal and has been assigned an ER ID number. If it has not, ask RPF personnel to assign an ER ID number. If the document does not have an ER ID number and is not a recent submittal, submit the document to RPF according to EP-DIR-SOP-4004, *Records Transmittal and Retrieval Processes*. Be sure to enter the SWMU or AOC number in the Record Subject or Title field of the record transmittal form because this is a searchable field. For more information, see Attachment 3 for the guidance sheet on ER ID and work plan reference numbers.
- Some documents for potential inclusion into Master Files are controlled. For instance, certain documents may be categorized as Official Use Only (OUO). Controlled documents **MAY NOT** reside in Master Files.
 - For controlled information, insert the title of the document and (if applicable) its ER ID or records package number under the appropriate category of the TOC/Checklist. Following the title and ER ID number, insert text stating that the document is controlled information and provide the place where the controlled information resides and may be obtained (for example: *in the RPF*).
 - Some documents marked OUO may be reviewed by a Derivative Classifier and, at the discretion of the Derivative Classifier, altered to not include the OUO information. In such cases, the altered document (or altered relevant pages) may be included in the Master File with a note in the TOC/Checklist denoting the document has been altered to non-OUO status by a Derivative Classifier. Provide the place where the unaltered OUO information resides.

3.2 Section I—General Site Information

Each Master File must include *Section I—General Site Information*. Compile general site information and insert into tabbed Section I of the Master File. Section I must contain a fact sheet, a copy of the original 1990 SWMU Report page(s) for the SWMU/AOC, maps/figures depicting the SWMU/AOC and its location with respect to its technical area (TA), and photograph(s) of the site. If necessary, update the TOC/Checklist to include all inserted documents.

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1. Place the fact sheet into tabbed Section I of the Master File. The fact sheet consists of a printout of the information that appears under the Unit Description for a particular site in the PRS Database. To get to the Unit Description, enter the SWMU or AOC number in the PRS Number box on the first page of the PRS Database and then click on the Go button. Next click on the number of the SWMU or AOC that appears on the PRS Results page.

NOTE: The fact sheet must be updated periodically until the site it describes becomes administratively complete.

2. Place a copy of the 1990 SWMU Report page(s) for the specific SWMU or AOC into tabbed Section I of the Master File.

NOTE: SWMU or AOC numbers that start with a C- (e.g., C-03-003) are listed in Appendix C, located at the back of Volume IV of the 1990 SWMU Report. SWMUs and AOCs identified after November 1990 will not have a SWMU Report page.

3. Place maps, figures, and site photographs for the specific SWMU or AOC into tabbed Section I of the Master File.

Include at least one map (or figure) depicting the SWMU or AOC and showing the location of the SWMU or AOC with respect to the TA within which it is located. Maps/figures can be found in the PRS Database, in RFI work plans, and in reports. Label each map/figure to reference the document or database from which it is taken.

Include site photograph(s) (preferably color) taken during the site investigation and also (if applicable) after cleanup or other corrective action. If applicable, label each photograph with its ER ID number. Update the TOC/Checklist to include the ER ID number for each photograph filed under tabbed Section I. Photographs can be located at and printed from the PRS Database, the RPF, the EP-WES photograph archives (located on P drive at P:\Photo1 and P:\Newphoto), and electronic photograph files owned by various project leaders.

NOTE: Some photographs in the database are incorrect. For example, a photograph in the PRS Database associated with an interior floor drain in a TA-16 utility room shows an exterior storm drain of the building. The Master File compiler should check the photograph against the fact sheet description and confirm its validity with a subject matter expert.

3.3 Section II—Regulatory History and Correspondence

Each Master file must include *Section II—Regulatory History and Correspondence*. Compile copies, applicable pages (as described in Section 3.1, Step 2 of this SOP), or CDs/DVDs of all relevant regulatory documents submitted to and received from the Administrative Authorities and insert into tabbed Section II of the Master File. Relevant regulatory documents include work plans, reports, submittal letters and any comments on these submittals such as notices of deficiency (NODs), requests for supplemental information (RSIs), and approval letters. Order these documents starting with the most recent submittal and descending in date order. If including a CD, label the CD/DVD with the title and the ER ID number of the document included on the CD/DVD.

As new documents are added to an already existing Section II, update the TOC/Checklist to include the newly inserted documents.

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1. Documents supporting NFA cited in RFI work plans:
 - For any SWMU or AOC proposed and approved for NFA in an RFI work plan based on archival research only (i.e., not supported by EP-WES field investigation data), include each document supporting NFA that is cited in the work plan. In most cases, the support document is a memorandum, interview, telecommunication, or other account of information that supports the NFA proposal (see Section 3.4, Step 2, of this SOP for information on where to physically locate additional references). Do not include copies of general citations such as the Laboratory's *Installation Work Plan*, DOE orders, Codes of Federal Regulations, etc.
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2. Other documents supporting NFA:
 - For SWMUs/AOCs that did not require sampling but required additional information to support NFA beyond what was presented in an RFI work plan or aggregate area report, the additional information is usually presented in a request for permit modification, in a document providing supplemental information, in a response to a NOD, or in a document describing activities to meet DOE functional area A.2 performance measures. Such sites generally were proposed for NFA under NFA Criteria 1, 2, or 4.

3.4 Section III—Additional Information

As applicable, each Master File must include any other documentation that supports NFA or other corrective action proposal status for a SWMU or AOC and subsequent acceptance. Any other pertinent information deemed relevant by the PRS Database Manager may also be placed into this section.

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1. Insert into tabbed Section III of the Master File copies of all other decision documents that support a SWMU's or AOC's NFA or other corrective action proposal status and subsequent acceptance. Only decision documents that have not been included in tabbed Sections I–II of the Master File should be included in Section III. If necessary, update the TOC/Checklist to include all inserted documents.
 - Additional decision support documents can include, but are not limited to
 - engineering drawings,
 - memoranda or phone records documenting information obtained from knowledgeable facility or site workers, and
 - signed closure letters from another regulatory authority such as the New Mexico Petroleum Storage Tank Bureau or the EPA Toxic Substances Control Act (TSCA) program.
 - If no other decision documents exist for a SWMU or AOC, insert the text *No Other Decision Documents Are Applicable* in the first row after the heading *Section III—Additional Information*.
-
2. Search for other decision documents.
 - Additional decision documents may be found at the Engineering Division, in the files of project leaders and subject matter experts, in the SMO, and in the RPF. Any documents that are located but are not in the RPF must be submitted to the RPF according to EP-DIR-SOP-4004, *Records Transmittal and Retrieval Processes*.

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3.5 Section IV—Interim Holding Area

At the discretion of the Master File compiler, a temporary tabbed Section IV may be added to a Master File. Section IV is to be used only as an interim holding area for any documentation that has not yet been reviewed and sorted into its proper location in tabbed Sections I through III. Section IV also may be used to hold any documentation that has not yet received an ER ID number or any documentation that is waiting to be scanned for inclusion on a CD/DVD. Once all items held in Section IV have been transferred into tabbed Sections I–III, Section IV is discarded.

Note: a Master File may not be transitioned to a Closeout File (see Section 3.6 of this SOP) until all items residing in Section IV have been transferred into Sections I–III or discarded if not needed.

3.6 Transition of a Master File to a Closeout File

Master Files for SWMUs/AOCs that have become administratively complete must be reviewed by an assigned EP-WES regulatory subject matter expert to ascertain completeness of content. The regulatory subject matter expert checks the contents of the file against the TOC/Checklist and ensures that any missing information is added to the file. Once the reviewer is satisfied that the Master File contains all the available information that led to the final corrective action decision, the reviewer instructs the PRS Database Manager to transition the Master File to a Closeout File. The PRS Database Manager ensures that the Master File is clearly marked as a Closeout File and a copy of the Closeout File is submitted to RPF.

Closeout Files are considered the administrative record of completeness for the EP-WES Division and are equivalent to the requirements for supporting a Record of Decision as prescribed by the Superfund program set forth under the Comprehensive Environmental Response, Compensation and Liability Act of 1980.

3.7 Records

EP Participant	1.	Submit information to be included in Master Files to the PRS Database Manager or to Master File compilers.
PRS Database Manager	2.	Upon the completed transition of a Master File to a Closeout File, the PRS Database Manager is responsible for ensuring that a complete copy of each Closeout File is submitted to the RPF in accordance with EP-DIR-SOP-4004, <i>Records Transmittal and Retrieval Processes</i> .

4.0 ATTACHMENTS

Attachment 1: Flow Chart of the Process for Compiling Master Files

Attachment 2: Table of Contents/Checklist for Master Files

Attachment 3: Additional Guidance for Compiling Master Files: Reference Numbers and Querying the Records Processing Facility Database for Field Documentation

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5.0 REVISION HISTORY

Author: Linda Nonno

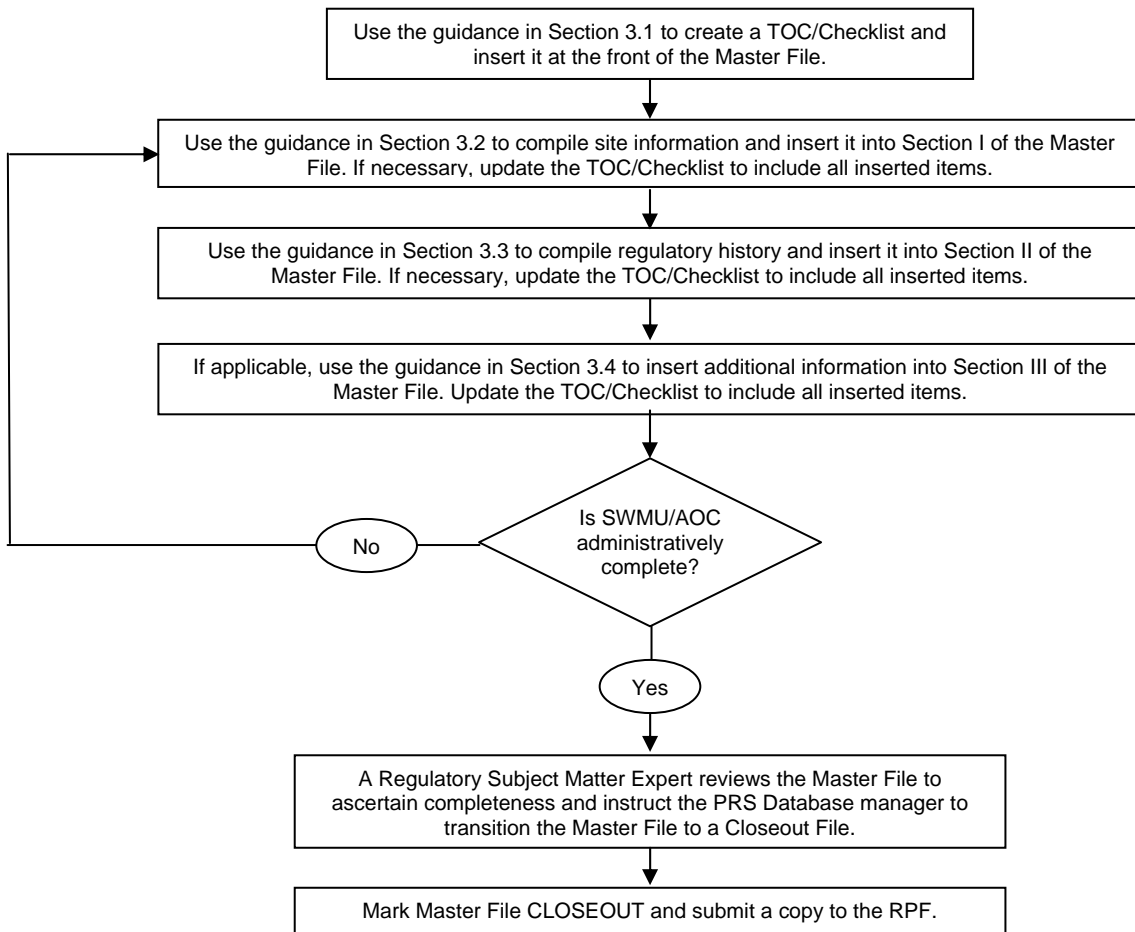
Revision No. <i>[Enter current revision number, beginning with Rev.0]</i>	Effective Date <i>[DCC inserts effective date for revision]</i>	Description of Changes <i>[List specific changes made since the previous revision]</i>	Type of Change <i>[Technical (T) or Editorial (E)]</i>
0	10/30/08	New document	New
1	June 26, 2009	<ol style="list-style-type: none"> 1. Section 3.1 updated. 2. Section 3.4 (<i>Section III–Analytical Results, Analytical Results Documentation, and Field Work Documentation</i>) removed. 3. Subsequent sections renumbered. 4. All text references and attachments revised to reflect above changes. 	T/E

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ATTACHMENT 1	
5221-1 Process for Compiling Master Files	Records Use only 

FLOW CHART OF THE PROCESS FOR COMPILING MASTER FILES



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ATTACHMENT 3	
5221-3 Additional Guidance for Compiling Master Files	Records Use only 

ADDITIONAL GUIDANCE FOR COMPILING MASTER FILES

Reference Numbers

There are some idiosyncrasies with reference numbers. The current ER ID numbering system was established for the Environmental Programs (EP) Directorate (formerly the Environmental Restoration [ER] Project) documents in 1995, after many operational unit (OU) work plans had already been written. Prior to 1995, work plans used a reference numbering system that contained a 1 or 2 digit number followed by a dash, then followed by the number assigned to each reference document collected for the work plan. For example, the reference number assigned to the OU 1114 work plan was 17, so a reference citation would look like this: (*Smith 1965, 17-0967*).

Work plan reference numbers were superseded in March 1995 when at the request of the U.S. Department of Energy Los Alamos Site Office, a new policy was issued requiring that ER ID numbers be the *only* reference numbers to appear in ER reports.

Although all references cited within a work plan currently should have an ER ID number that replaced the earlier OU work plan reference number, this is not always the case. Some documents with OU work plan reference numbers have not been cited in more recent reports and consequently have never been updated with an ER ID number. Master File compilers should be on the lookout for documents that do not have ER ID numbers and submit them to RPF according to EP-DIR-SOP-4004, *Records Transmittal and Retrieval Processes*.

Querying the Records Processing Facility Database for Documentation

When querying the Records Processing Facility (RPF) for documentation, do not be too specific in the search field because solid waste management unit (SWMU)/area of concern (AOC) numbers within the titles of RPF documents are not consistent and vary between one-and two-digit prefixes. Thus, a search for documents using a two-digit prefix such as *03-056(c)* will result in no documents listed as a one-digit prefix, i.e., *3-056(c)*. However, a search using a one-digit prefix such as *3-056(c)* will provide all one- and two-digit prefixes.

In addition, documents are often submitted to the RPF as one submittal containing multiple related documents. RPF assigns such submittals with a single records package number and also assigns an individual ER ID number to each separate document within the submittal. In many cases, when the record package was entered into the RPF system, the SWMU/AOC number was not included in the title of each individual document within the record package. Thus, all the documents associated with a SWMU/AOC do not show up under the query using the SWMU number alone. In such cases, it is necessary to perform a second query for the record package number. Therefore, when searches for documentation are conducted, additional queries for each record package number should be performed to ensure that all documentation is located.