

**FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (FFA/CO)  
NEW SITE IDENTIFICATION (NSI)**

<b>Part A – NEW SITE IDENTIFICATION INFORMATION</b>		<b>NSI-25061</b>
<b>(To be completed by the Task Lead for New Site)</b>		
<b>1. Site Title: Inactive underground fuel lines connecting the TAN-611 Fuel Pump House to the former TAN-625 IET Fuel Pump Station and the former TAN-609 Equipment Maintenance Shop.</b>		<b>Site Code: TSF-57</b>
(Use known common names, location descriptors and or processes near or associated with the suspected inactive waste site.)		<b>NSI Evaluation Initiation Date: August 10, 2006</b>
<b>2. Task Lead For New Sites: Wendell Jolley</b>		Phone: Phone: 526-5990
<b>3. NSI Coordinator: Wendell Jolley</b>		Phone: Phone: 526-5990
<b>4. Initiator or Initial Observer: Marcus Pinzel</b>		Phone: 533-0626
<b>5. Description of Suspected New Site and Location:</b>		
<p>During D&amp;D excavation work at Test Area North (TAN) in July 2006, two separate sections of inactive underground pipelines were discovered and unearthed. When operational, these pipelines had been used to distribute petroleum products, either engine fuel (#2 diesel) or jet fuel (kerosene), throughout the plant.</p> <p>The first line, a buried section of a 3-inch diameter insulated pipe and a reinforced-concrete valve-pit was discovered while excavating soil to a depth of four feet for use as overburden at the TAN-1755 Landfill. There was no release of fluid to the environment.</p> <p>After investigating the situation, workers identified the pipe, roughly one mile in length, as one that had formerly connected the TAN-611 Pump House and the TAN-625 Fuel-Transfer-Pump Building at the Initial Engine Test (IET) facility (Figure 1). This line disturbance occurred roughly half-way between the TAN and IET areas and within the general area of the Tan 1755-Landfill (Figure 2).</p> <p>For historical perspective, after the IET project was cancelled in 1961. The TAN-625 Fuel Transfer Pump Building was made cold, dark, and dry in 1975 and was demolished in 1994. The TAN-611 building, inactivated in 2006, is scheduled for demolition during early 2007. Considering that the TAN-625 receiving-end of this line has been inactive for some 30 years, and based on input from the TAN Project Environmental Lead, Marcus Pinzel, the line is presumed to be dry and wrapped with non-friable asbestos. When analyzed by polarized microscopy with dispersion staining (ACMM-6992), the asbestos was found to be 19% Chrysotile.</p> <p>The exhumed pieces of insulated pipe were subsequently removed from the excavation area and bagged for disposal at the TAN landfill, which is approved for disposal of non-friable asbestos. The reinforced concrete valve-pit was also buried at the TAN landfill. The residual buried pipeline not removed following the line discovery is considered “dry,” and is therefore thought to pose no significant risk to the public or the environment.</p> <p>The second line was discovered on July 26, 2006, as D&amp;D workers excavated a 2.5-inch insulated underground line near the southeast corner of TAN-607A (Figures 1 and 3). The disturbance of this second line, which also originates at TAN-611 but terminates about 1000 feet to the southwest at the site of the TAN-609 building, allowed the gravity draining of approximately 2 gallons of petroleum product to the surrounding soil. And because the release was from the lowest point in the pipeline, it is currently presumed to be empty. The TAN-609 building was made cold, dark, and dry in 1995, and was demolished in 1995.</p> <p>Within 24 hours of the incident, the spill had been reported to the on-site cognizant environmental-organization and the area had been stabilized and cleaned. Because the spill didn't exceed the 25 gallon reportable quantity for petroleum products and was cleaned-up within 24 hours, no further agency notification was deemed necessary. The exposed section of this pipeline was subsequently plugged and the area was backfilled for site safety.</p> <p>When sampled for lab analysis, the pipe's insulation was found to be 25% Amosite asbestos, and according to the TAN Project Environmental Lead, Marcus Pinzel, the asbestos is non-friable. The pieces of the pipe removed from the</p>		

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excavation were subsequently bagged and disposed of at the TAN-755 Landfill.

Based on this information derived from discussions with the Tan Project Environmental Lead and available drawings, the proposed CERCLA recommendation for these empty, below-grade, non-friable-asbestos wrapped fuel-lines is "No Action."

6. Is the site a Solid Waste Management Unit (SWMU) as defined in OSWER Directive 9502.00-6?  Yes  No

7. Recommendation

- Recommend not including as a new FFA/CO site. This site DOES NOT warrant further investigation, does not meet the criteria for acceptance, and should not be included under FFA/CO Action Plan.
- Recommend including as new FFA/CO site. This site DOES meet the criteria for acceptance, may warrant further investigation, and should be included under FFA/CO Action Plan.

Recommended Waste Area Group (WAG) and Operable Unit to which site should be assigned:

WAG: 10                      Operable Unit: 10-08

Recommended action for this site:

- No Action    No Further Action    Remedial Action under Existing ROD    Track 2    RI/FS

8. Responsible Manager Signature:

Name: Lane Butler

Signature: 

Date: 11/1/07

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**PART B – FFA/CO RESPONSIBLE PROGRAM MANAGERS (RPM'S) CONCURRENCE**

Site Title:

Site Code:

TSF-57

DOE-ID FFA/CO RPM Concurrence:  Concur with recommendation.  Do not concur with the recommendation.

Signature:

*[Handwritten Signature]*

Date: 1-22-07

Explanation:

*Given the fact the these underground pipelines only conveyed petroleum products and are now likely empty, it is very unlikely that an unacceptable risk is posed. Therefore, I agree that TSF-57 should be a "No Action" site.*

EPA FFA/CO RPM Concurrence:  Concur with recommendation.  Do not concur with the recommendation.

Signature:

Date:

Explanation:

State of Idaho

FFA/CO RPM Concurrence:  Concur with recommendation.  Do not concur with the recommendation.

Signature:

Date:

Explanation:

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**DOE-ID FFA/CO RPM Concurrence:**     Concur with recommendation.     Do not concur with the recommendation.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
Explanation:

**EPA FFA/CO RPM Concurrence:**     Concur with recommendation.     Do not concur with the recommendation.

Signature: *R. Math Wilber* Date: 10/10/07  
Explanation:

Based on the information contained in the NSI, EPA concur that these fuel lines should be considered a NO Action Site. The fuel lines appear dry and thus pose no significant risk to human health or the environment.

**State of Idaho FFA/CO RPM Concurrence:**     Concur with recommendation.     Do not concur with the recommendation.

Signature: *Jaryl J. Fok* Date: 10/10/07  
Explanation:

We are in agreement that this should be a "No Action" site based on no significant risk to human health and the environment. The fuel line appears dry and all associated structures have been or will be decommissioned. Excavations around former pipeline appear complete

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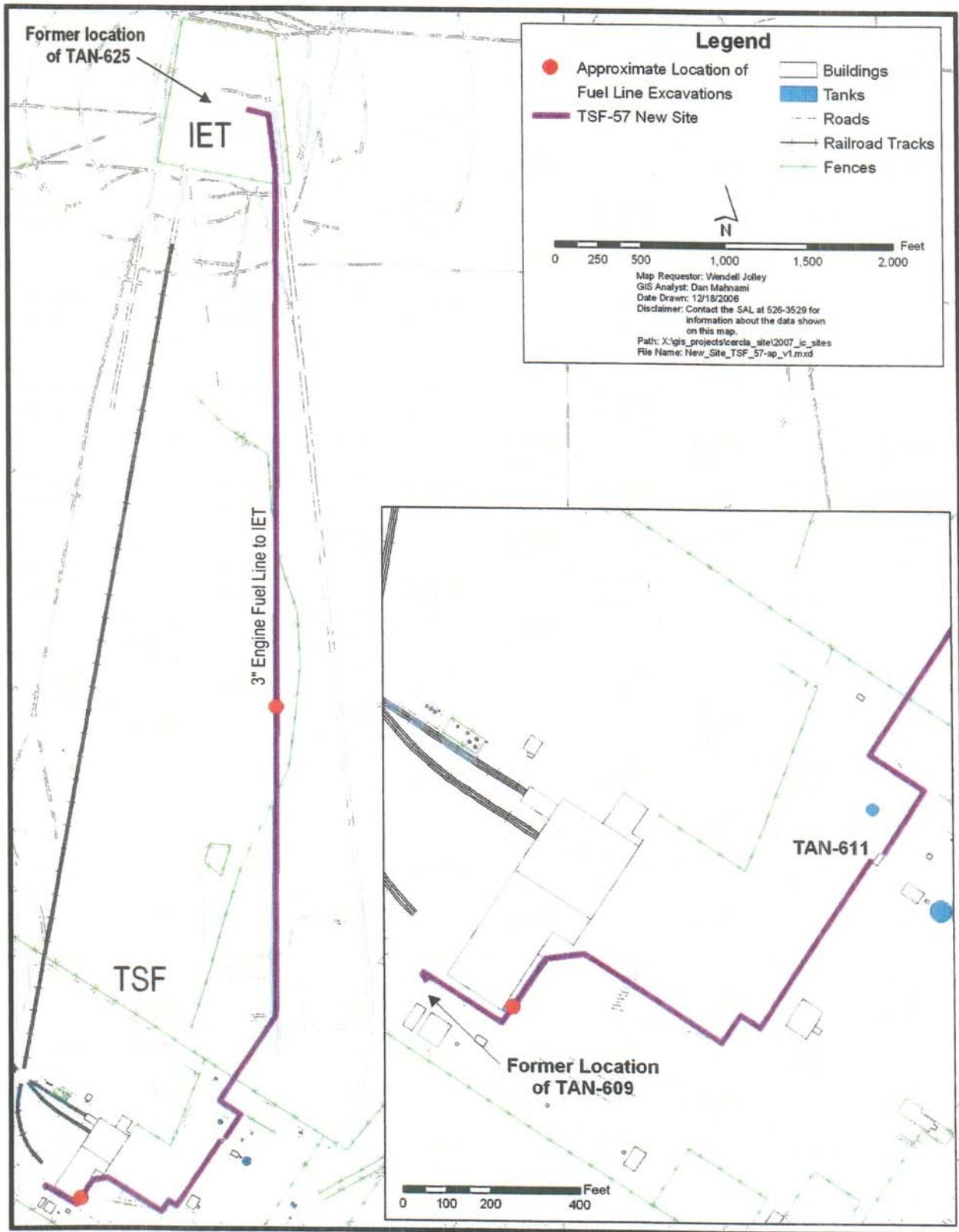


Figure 1, Approximate location of TAN TSF-57 Fuel Line Excavations

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**Figure 1, Approximate location of TAN TSF-57 Fuel Line Excavations**



**Figure 2, General location of TSF-57 Fuel Line Excavation looking South toward TAN-611.**

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**Figure 3, Location of TSF-57 Fuel Line Excavation looking Northeast toward TAN-607 and its Annexes.**