

**Completion of Corrective Action
at Site 32-004
in LA-SMA-5.33**

March 7, 2013

NPDES PERMIT NO. NM0030759

LA-UR-13-21522

Completion of Corrective Action at Site 32-004

This letter certifies completion of corrective action for Site 32-004 pursuant to Part 1, E.2(d), of the Individual Permit NM0030759. This certification that corrective action is complete was prepared in accordance with 40 Code of Federal Regulations 122.22(b).

Table 1 presents the Sites achieving Resource Conservation and Recovery Act Corrective Action Complete with Controls status under the Compliance Order on Consent (the Consent Order). Analytical results obtained from baseline confirmation monitoring at LA-SMA-5.33 exceeded target action levels for gross alpha causing the Permittees to initiate corrective action. The Permittees are certifying completion of correction action at Site 32-004 through a demonstration that the Site has achieved a certificate of completion under the Consent Order, Section VII.E.6.b. Attachment 1 contains a copy of the certificate of completion from the New Mexico Environment Department for Site 32-004, which is designated as Area of Concern 32-004 for purposes of the Consent Order.

Table 1
Site(s) Demonstrating Completion of Corrective Action

Site Number	Associated SMA Number	Watershed	Site Priority
32-004	LA-SMA-33	Los Alamos/Pueblo	Moderate

Completion of Corrective Action at Site 32-004

Attachment 1

Certificate of Completion for Site 32-004



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us



DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

JAMES H. DAVIS, Ph.D.
Director
Resource Protection Division

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 28, 2012

Pete Maggiore
Assistant Manager
Environmental Projects Office
National Nuclear Security Administration
Los Alamos Site Office
3747 West Jemez Road, MS A316
Los Alamos, NM 87544

Jeffrey D. Mousseau
Associate Director
Environmental Programs
Los Alamos National Security, L.L.C.
P.O. Box 1663, MS M991
Los Alamos, NM 87545

**RE: CERTIFICATES OF COMPLETION
TWO SOLID WASTE MANAGEMENT UNITS AND ONE AREA OF CONCERN
IN THE UPPER LOS ALAMOS CANYON AGGREGATE AREA
EPA ID #NM0890010515
HWB-LANL-12-072**

Dear Messrs. Maggiore and Mousseau:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and the Los Alamos National Security L.L.C.'s (LANS) (collectively, the Permittees) *Request for Certificates of Completion for Two Solid Waste Management Units and One Area of Concern in the Upper Los Alamos Canyon Aggregate Area*, dated December 20, 2012 and referenced by EP2012-0304.

1. **Solid waste management unit (SWMU) 32-002(b1)** is a part of a former septic system that served former buildings 32-01 and 32-02 at former technical area (TA) 32. Former TA-32 was decommissioned in 1954. SWMU 32-002(b1) is the portion of the former septic system (32-002(b)) that is located on property currently owned by Los Alamos County (LAC). The remainder of the septic system is located on the property owned by

DOE and is designated as 32-002(b2). SWMU 32-002(b) was split into two separate SWMU in December 2012 through a permit modification to facilitate commercial development of the property owned by LAC. The outfall for SWMU 32-002(b) is located at the edge of Los Alamos Canyon, which is now part of SWMU 32-002(b2). The septic tank was removed in 1998, and the influent drainline was removed in 1996. Research activities mainly involved radionuclides, but other inorganic and organic chemicals were likely also used at the laboratory. Investigations were conducted at the site in 1996, 2008, and 2010.

The results of the investigations are reported in the *Remedy Completion Report for Upper Los Alamos Canyon Aggregate Area, Former Technical Area 32, Revision 1* (dated February 2011 and referenced by LA-UR-11-1177/EP2011-0064) and *Supplemental Remedy Completion Report for Upper Los Alamos Canyon Aggregate Area, Former Technical Area 32* (dated December 2012 and referenced by LA-UR-12-27053/EP2012-0306). Based on the results of the risk screening assessments, no potential unacceptable risk from residual contamination exists for the recreational, industrial, and construction worker scenario. However, the site does pose potential unacceptable risk under a residential exposure scenario. The site does not pose potential risk to ecological receptors under the proposed land use scenario. SWMU 32-002(b1) qualifies for corrective action complete with controls status. The control for the site is that the land use must be maintained as industrial.

2. **Area of Concern (AOC) 32-004** consists of a former drainline and outfall that served building 32-03 and discharged to Los Alamos Canyon. Building 32-03 was an office building and contained a vault room where a radioactive source was stored. The drainline at AOC 32-004 led directly to an outfall at the edge of the mesa without passing through a septic tank. Building 32-03 was removed when TA-32 was decommissioned in 1954. A section of the drainline located on LAC property was removed in 1996. Investigations were conducted at the site in 1993, 1996, 2008, and 2010.

The results of the investigations were reported in the *Remedy Completion Report for Upper Los Alamos Canyon Aggregate Area, Former Technical Area 32, Revision 1* (dated February 2011 and referenced by LA-UR-11-1177/EP2011-0064). Based on the results of the risk screening conducted at the site, AOC 32-004 does not pose a potential unacceptable risk for the industrial, recreational, and construction worker land use scenarios. No potential unacceptable risks to ecological receptors are present at the site under the proposed industrial/commercial land use scenario. However, potential unacceptable risk exists under a residential land use scenario. AOC 32-004 qualifies for corrective action complete with controls status. The control is to maintain the land use as industrial.

3. **SWMU 32-002(a)** is a former septic system that was installed in 1944 and served former building 32-01. The outlet drainline discharged to the edge of Los Alamos Canyon.

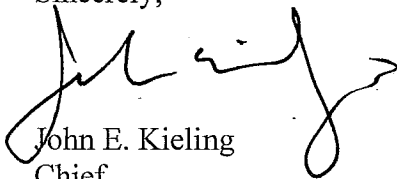
Former building 32-01 operated as a research laboratory from 1944-1954. Research activities mainly involved radionuclides, but inorganic and organic chemicals were likely also used at the laboratory. Former TA 32 was decommissioned in 1954. The septic tank was removed prior to 1996, but historical records of the removal activities are not available. The drainlines were removed in 1996. Investigations were conducted in 1996, 2008, 2010, and 2011.

The results of the investigations were reported in the *Remedy Completion Report for Upper Los Alamos Canyon Aggregate Area, Former Technical Area 32, Revision 1* (dated February 2011 and referenced by LA-UR-11-1177/EP2011-0064) and *Supplemental Remedy Completion Report for Upper Los Alamos Canyon Aggregate Area, Former Technical Area 32* (dated December 2012 and referenced by LA-UR-12-27053/EP2012-0306). Results of the investigations were used to evaluate the risk posed by the site. The site does not pose any unacceptable risk under an industrial land use scenario. However, the construction worker scenario was not evaluated. The Permittees must evaluate the risk posed to a construction worker by residual contamination at the site. The ecological risk evaluation indicated that the site does not pose unacceptable risk to the ecological receptors under the proposed land use scenario. NMED will make the corrective action completion determination after reviewing the results of evaluation of potential risk posed to a construction worker to be submitted by the Permittees.

NMED hereby issues a Certificate of Completion with Controls for SWMU 32-002(b1) and AOC 32-004. If new information becomes available that indicates that any of these sites may pose a risk to human health or the environment, NMED may require the Permittees to conduct additional corrective action.

Please contact Neelam Dhawan at (505) 476-6042, if you have any questions.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc:

J. Davis, NMED HWB
D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
S. Yanicak, NMED DOE OB, MS J993
T. Skibitski, NMED DOE OB
L. King, EPA 6PD-N

Messrs. Maggiore and Mousseau
December 28, 2012
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E. Worth, DOE LASO, MS A316
T. Haagenstad, EP-CAP, MS M992

File: 2012 LANL, Certificates of Completion for TA-32, Upper Los Alamos Canyon AA Sites
(LANL 12-072)