

**Completion of Corrective Action
at Site 46-004(m) in CDB-SMA-0.55**

November 22, 2013

NPDES PERMIT NO. NM0030759

LA-UR-13-28927

LOS ALAMOS NATIONAL LABORATORY
CERTIFICATION OF COMPLETION OF CORRECTIVE ACTION

PF: C003

CDB-SMA-0.55

Site: 46-004(m)

The following certification was performed in accordance with NPDES Permit No. NM0030759, Part I.E.2, which requires the Permittees (i.e., DOE and LANS) to certify the completion of corrective action.

CERTIFICATION STATEMENT OF AUTHORIZATION

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."



Environmental Programs
Corrective Actions Program
Los Alamos National Laboratory

11/20/2013

Date



Los Alamos Field Office
National Nuclear Security Administration

11-22-2013

Date

**LOS ALAMOS NATIONAL LABORATORY
CERTIFICATION OF COMPLETION OF CORRECTIVE ACTION**

PF: C003

CDB-SMA-0.55

Site: 46-004(m)

This certificate indicates completion of corrective action for Site 46-004(m) 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 Site achieving Resource Conservation and Recovery Act “corrective action complete without controls/corrective action complete with controls” status under the Compliance Order on Consent (the Consent Order). Analytical results obtained from baseline confirmation monitoring at CDB-SMA-0.55 exceeded target action levels for copper and total polychlorinated biphenyls, causing the Permittees to initiate corrective action. The Permittees are certifying completion of correction action at Site 46-004(m) through a demonstration that the Site has achieved a certificate of completion under the Section VII.E.6.b of the Consent Order. Table 2 presents other Sites associated with CDB-SMA-0.55. Attachment 1 contains a copy of the certificate of completion from the New Mexico Environment Department for Site 46-004(m), which is designated as Solid Waste Management Unit 46-004(m) for the purposes of the Consent Order.

**Table 1
Site(s) Demonstrating Completion of Corrective Action**

Site Number	Associated SMA Number	Watershed	Site Priority
46-004(m)	CDB-SMA-0.55	Mortandad	Moderate

**Table 2
Other Sites Associated with CDB-SMA-0.55**

Site Number	Associated SMA Number	Watershed	Site Priority
46-004(g) 46-004(s) 46-006(f)	CDB-SMA-0.55	Mortandad	Moderate

Attachment 1

Certificate of Completion for Site 46-004(m)



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

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DAVE MARTIN
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BUTCH TONGATE
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JAMES H. DAVIS, Ph.D.
Director
Resource Protection Division
EP2012-5183

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 13, 2012

Peter Maggiore, Assistant Manager
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Los Alamos Site Office
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Los Alamos, NM 87544

Michael J. Graham, Associate Director
Environmental Programs
Los Alamos National Security, L.L.C.
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Los Alamos, NM 87545

**RE: APPROVAL OF REQUEST FOR CERTIFICATES OF COMPLETION FOR SIX
SOLID WASTE MANAGEMENT UNITS AND ONE AREA OF CONCERN IN
THE UPPER CAÑADA DEL BUEY AGGREGATE AREA
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-11-049**

Dear Messrs. Rael and Graham:

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 Six Solid Waste Management Units and One Area of Concern in the Upper Cañada Del Buey Aggregate Area* (Request), dated July 14, 2011, and referenced by EP2011-0242.

The request included the following Solid Waste Management Units (SWMUs) and Area of Concern (AOC):

SWMU 46-002, Surface Impoundment
SWMU 46-004(m), Inactive Outfall
SWMU 46-004(p), Inactive Dry Well
SWMU 46-006(b), Former Storage Shed

SWMU 46-006(g), Storage Area
SWMU 52-001(d), Former Facility Equipment
AOC C-46-001, Spill/Release Area

These SWMUs and the AOC were recommended for corrective action complete in the report entitled *Investigation Report for Upper Cañada del Buey Aggregate Area, Revision 1* (Report), dated May 2011 that summarized work completed in 2010. NMED approved the Report on May 31, 2011. The Permittees have satisfied the requirements of the March 1, 2005 Consent Order for completion of corrective action at these sites.

SWMU 46-002 is a surface impoundment system located at the eastern end of TA-46, southeast of the prototype fabrication building (46-77). The impoundment system was constructed in the early 1970s to receive sanitary wastewater from buildings located within the restricted access area of Technical Area (TA)-46. The lagoon was removed from service in the early 1990s when the Sanitary Wastewater System Consolidation (SWSC) plant came online. The outfall from the surface impoundment system had been removed from the National Pollutant Discharge Elimination System (NPDES) permit by 1993. Based on the risk screening assessment results, no potential unacceptable risks or doses from contaminants of potential concern (COPCs) exist for the industrial, construction worker, and residential scenarios. No potential ecological risks exist for any receptor following evaluations based on minimum ecological screening levels (ESLs), hazard index (HI) analyses, comparison with background concentrations, potential effects to plant and animal populations, and lowest observed adverse effect level (LOAEL) analyses.

SWMU 46-004(m) is a former NPDES-permitted outfall located approximately 60 ft north of building 46-30 at TA-46. The outfall protrudes from a slope on the hillside north of building 46-30. The outfall discharged effluent from an industrial drainline in building 46-30 to a ditch at the foot of the bank. In December 1995, the outfall was removed from the NPDES permit. Before the outfall was removed from the NPDES permit, all discharges to the outfall from building 46-30 ceased. Based on the risk screening assessment results, no potential unacceptable risks or doses from COPCs exist for the industrial, construction worker, and residential scenarios. No potential ecological risks exist for any receptor following evaluations based on minimum ESLs, HI analyses, comparison with background concentrations, potential effects to plant and animal populations, and LOAEL analyses.

SWMU 46-004(p) is an inactive dry well located next to the southwest corner of building 46-1 at TA-46. The dry well consists of corrugated metal pipe, approximately two feet in diameter and 10 feet in length, placed vertically in the ground, with a square concrete pad around the top three feet of the pipe, and covered with a hinged-metal lid. Building 46-1 housed offices, two assembly bays, a machine shop, several laboratories for the assembly and checkout of electrical components, general laboratories, and a uranium polishing area. All COPCs identified for

SWMU 46-004(p) were reported in samples collected from depths greater than 10 feet below ground surface (bgs). Therefore, no complete pathways to receptors for any of the exposure scenarios exist, and human health risk-screening assessments were not conducted for this site. All COPCs identified for SWMU 46-004(p) were reported in samples collected from depths greater than 10 feet bgs. Therefore, no complete pathways to any ecological receptors exist, and an ecological risk screening assessment was not conducted for this site.

SWMU 46-006(b) is a former storage shed that was located approximately 40 feet north of the Laser Isotope Support Facility at TA-46. The shed was installed sometime before 1977. The site of the shed is paved with asphalt and slopes toward a storm drain to the southeast. The shed was removed in 1990. Based on the risk-screening assessment results, no potential unacceptable risks from COPCs exist for the industrial, construction worker, and residential scenarios. No potential ecological risks exist for any receptor following evaluations based on minimum ESLs, HI analyses, comparison with background concentrations, potential effects to populations (individuals for threatened and endangered species), and LOAEL analyses.

SWMU 46-006(g) is a storage shed located at the west end of building 46-31 at TA-46. The shed is of corrugated-steel construction and measures 10 feet by 20 feet. From 1982 to 1984, the shed housed vacuum pumps used in experiments involving plasma vaporization of depleted uranium powder. The area around the shed is level and paved. Based on the risk-screening assessment results, no potential unacceptable risks from COPCs exist for the industrial, construction worker, and residential scenarios. No potential ecological risk was found for any receptor following evaluations based on minimum ESL, HI analyses, comparison with background concentrations, potential effects to populations (individuals for threatened and endangered species), and LOAEL analyses.

SWMU 52-001(d) used to contain various facility equipment. This site operated from 1967 to 1968 and underwent decontamination and decommissioning in 1989. Supplemental information provided to NMED in 2008 demonstrated that any releases outside building 52-01 would be associated with the other SWMUs associated with the building and additional sampling of SWMU 52-001(d) was not necessary.

AOC C-46-001 is the location of a one-time spill of mercury in the vicinity of building 46-75 at TA-46. On July 22, 1975, 0.55 to 1.1 lb of mercury spilled on the ground near building 46-75. The spill was cleaned up shortly after it occurred and aerial photos show the entire area surrounding building 46-75 was paved at the time of the spill. A human health risk assessment was not performed for AOC C-46-001 because no COPCs were identified for the site. Therefore, no potential unacceptable risks from COPCs exist for the industrial, construction worker, and residential scenarios. An ecological risk assessment was not performed for AOC C-46-001 because no COPCs were identified for the site. Therefore, no potential risks from COPCs to ecological receptors exist.

NMED has reviewed the Request and, based on review of associated soil sample analytical data, the nature and extent of contamination at the SWMUs and AOC have been defined. NMED has

Messrs. Rael and Graham
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determined that the requirements of the Consent Order have been satisfied and the sites qualify for "Corrective Action Complete Without Controls" status. NMED hereby issues this certificate for the SWMUs and AOC listed above pursuant to Section VII.E.6.b of the Consent Order.

If, in the future, any additional information becomes available that indicates the site(s) may pose a risk to human health or the environment, NMED may require the Permittees to conduct additional corrective action at the site(s).

If you have any questions regarding this letter, please contact Daniel Comeau at (505) 476-6043.

Sincerely,



John E. Kieling
Acting Chief
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB
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File: 2011 - Approval_Rqst_for_CoCs, Upper CdB AA; LANL-11-049

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