State of New Mexico
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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

July 13, 2017

Doug Hintze, Manager
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Bruce Robinson, Program Director
Environmental Remediation Associate
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RE: REQUEST FOR CERTIFICATES OF COMPLETION WITHOUT CONTROLS FOR NINE SOLID WASTE MANAGEMENT UNITS AND ONE AREA OF CONCERN IN THE UPPER LOS ALAMOS CANYON AGGREGATE AREA
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-17-039

Dear Messrs. Hintze and Robinson:

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 Without Controls for Nine Solid Waste Management Units and One Area of Concern in the Upper Los Alamos Canyon Aggregate Area* (Request), dated June 15, 2017 and referenced by ADEM-17-0147.

The Permittees have recommended nine solid waste management units (SWMUs) and one area of concern (AOC) for corrective action complete without controls in the *Investigation Report for the Former Los Alamos Inn Property Sites within the Upper Los Alamos Canyon Aggregate Area, Revision 1* (Report), dated May 2017 and referenced by LA-UR-17-24019/EP2017-0071. NMED issued a *Notice of Disapproval* (NOD) for the Report on April 17, 2017 and an *Approval* on June 6, 2017. The Permittees have requested that nine SWMUs and one AOC be granted certificates of completion without controls.

The nine SWMUs and one AOC addressed in this letter were investigated in accordance with the NMED approved 2006 Phase I and 2010 Phase II investigation work plans for the Upper Los Alamos Canyon Aggregate Area. SWMU 01-001(d1), SWMU 01-001(s1), SWMU 01-002(a1)-00, SWMU 01-006(h1), and AOC 01-003(b1) were designated in 2017 by modification of the *Los Alamos National Laboratory Hazardous Waste Facility Permit, EPA ID No.NM0890010515* (Permit). The Permit modification split five existing sites into twelve newly-designated sites based on property ownership. The purpose of the permit modification was to facilitate the completion of corrective actions on the former Los Alamos Inn property portion of the SWMUs and AOCs prior to completion of corrective actions on the other privately-owned and DOE owned portions.

NMED hereby issues certificates of completion without controls for the following nine SWMUs and one AOC pursuant to Section XXI of the 2016 *Compliance Order on Consent* (Consent Order).

SWMU 01-001(d1) is a sanitary waste line that connected to septic tank 138 [SWMU 01-001(d2)]. The waste line served former buildings that housed a chemical stock room with a mercury still, a uranium and beryllium machine shop, and a physics laboratory that handled tritium, uranium-238, and polonium-210. The waste line, septic tank, and surrounding soil were removed during the Ahlquist radiological survey conducted from 1974-1976. A Phase I RFI was conducted in 1992 and 1994 during which the canyon rim area and hillside associated with SWMU 01-001(d1) were sampled. Investigations conducted in 2016 indicate that no potential unacceptable risks or doses from residual contamination exist for the industrial, construction worker, and residential land use scenarios. The results of the ecological risk screening assessment indicate no potential risk to ecological receptors at the site.

SWMU 01-001(s1) is the part of the western sanitary waste line (WSWL) located within the former LA Inn property. The WSWL was connected to most of the processing and production operations in the early history of the lab. The waste line emptied into a septic tank which discharged into Acid Canyon. In 1994 and 1996 a Phase I RFI was conducted to locate the waste line, evaluate potential releases, and remove accessible portions of the waste line. Investigations conducted in 2016 indicate that no potential unacceptable risks or doses from residual contamination exist for the industrial, construction worker, and residential land use scenarios. The results of the ecological risk screening assessment indicate no potential risk to ecological receptors at the site.

SWMU 01-002(a1)-00 consists of a section of a former industrial waste line that received chemical and radioactive process waste from 1943 to 1951. The industrial waste line was reported to have been completely removed along with a substantial amount of associated contaminated soil during the Ahlquist radiological survey (1974 to 1976). A Phase I RFI was conducted in 1993 and 1994 during which samples were collected along the path of the pipeline. Investigations conducted in 2016 indicate that no potential unacceptable risks or doses from residual contamination exist for the industrial, construction worker, and residential land use scenarios. The results of the ecological risk screening assessment indicate no potential risk to ecological receptors at the site.

SWMU 01-006(b) consists of a drainline and outfall that served a building used to process plutonium. During the Ahlquist Radiological Survey (1974 to 1976) the drainline and associated contaminated soil was removed. In 1992 and 1993, a Phase I RFI was conducted in the area of SWMU 01-007(a), within which SWMU 01-006(b) lies. Investigations conducted in 2016 indicate that no potential unacceptable risks or doses from residual contamination exist for the industrial, construction worker, and residential land use scenarios. The results of the ecological risk screening assessment indicate no potential risk to ecological receptors at the site.

SWMU 01-006(c) consists of possibly four drainlines and two outfalls that served a former facility used for laundering radioactively contaminated clothing and recyclable equipment for all of Technical Area (TA)-1 from 1943 to 1945. During the Ahlquist Radiological Survey (1974 to 1976) two of the drainlines were located and removed and associated contaminated soil was excavated. In 1992 and 1993, a Phase I RFI was conducted in the area of SWMU 01-007(b), within which SWMU 01-006(c) lies. Investigations conducted in 2016 indicate that no potential unacceptable risks or doses from residual contamination exist for the industrial, construction worker, and residential land use scenarios. The results of the ecological risk screening assessment indicate no potential risk to ecological receptors at the site.

SWMU 01-006(h1) is the portion of a storm water drainage system within the former LA Inn property boundary that served a building that housed model, glass, carpentry, and plumbing shops and a building that handled tritium, uranium-238, and polonium-210. During the Ahlquist Radiological Survey (1974 to 1976) the storm drains were located and the surrounding area was evaluated for radioactive contamination. Investigations conducted in 2016 indicate that nature and extent are defined or no further sampling is warranted for all chemicals of potential concern (COPCs). No complete exposure pathways to a receptor exists for the industrial, construction worker, and residential land use scenarios because all samples were collected from below the 0.0- to 10.0-foot interval. The results of the ecological risk screening assessment indicate that no complete exposure pathways to ecological receptors exist because all samples were collected from below the 0.0- to 5.0-foot interval.

SWMU 01-006(n) is a storm water drainage system that connected to a former plutonium processing building. No information on the excavation of this specific drainage system can be located, however, all drainlines and areas of elevated radioactivity associated with the former plutonium processing building were removed during the Ahlquist Radiological Survey (1974 to 1976). In 1992 and 1993, a Phase I RFI was conducted in the area of SWMU 01-007(a), downgradient of SWMU 01-006(n) and no contaminants of concern were identified. Investigations conducted in 2016 indicate that no potential unacceptable risks or doses from residual contamination exist for the industrial, construction worker, and residential land use scenarios. The results of the ecological risk screening assessment indicate no potential risk to ecological receptors at the site.

SWMU 01-007(a) is an area of suspected subsurface soil radiological contamination near a former building which was used for processing plutonium. SWMU 01-007(a) contains all or parts of SWMUs 01-002(a1)-00, 01-006(b), and 01-006(n). Areas of elevated radioactivity associated with the former plutonium processing building were removed during the Ahlquist

Radiological Survey (1974 to 1976). In 1992 and 1993, a Phase I RFI was conducted and samples were collected at the mesa-top area of the former building footprint and the hillside downgradient of SWMU 01-007(a). Investigations conducted in 2016 indicate that no potential unacceptable risks or doses from residual contamination exist for the industrial, construction worker, and residential land use scenarios. The results of the ecological risk screening assessment indicate no potential risk to ecological receptors at the site.

SWMU 01-007(b) is an area of suspected subsurface soil radiological contamination associated with the drainlines and outfalls that served a laundry facility for radioactively contaminated clothing and recyclable equipment for all of TA-1 which operated from 1943 to 1945. Areas of elevated radioactivity associated with the former laundry facility were removed during the Ahlquist Radiological Survey (1974 to 1976). In 1992 and 1993, a Phase I RFI was conducted and samples were collected at the mesa-top area of the former building footprint and the hillside downgradient of SWMU 01-007(b). Investigations conducted in 2016 indicate that no potential unacceptable risks or doses from residual contamination exist for the industrial, construction worker, and residential land use scenarios. The results of the ecological risk screening assessment indicate no potential risk to ecological receptors at the site.

AOC 01-003(b1) is the portion of a construction debris surface disposal area located within the former LA Inn property. In 1992 and 1996 attempts were made to locate the site. A few objects were found scattered over more than an acre on the hillside, and the portable beta/gamma instruments used to screen each object registered only background radiation. Investigations conducted in 2016 indicate that no potential unacceptable risks or doses from residual contamination exist for the industrial, construction worker, and residential land use scenarios. The results of the ecological risk screening assessment indicate no potential risk to ecological receptors at the site.

NMED has determined that the above-mentioned sites qualify for certificates of completion without controls. Although corrective action is complete under the Consent Order, the Permittees must continue to comply with all applicable state and federal regulations. If new information becomes available that indicates that these sites potentially pose a risk to human health or the environment, NMED may require additional corrective action at these sites.

If you have any questions regarding this correspondence, please contact Robert Murphy of my staff at 505-476-6022.

Sincerely,

John E. Kieling
Chief
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File: Reading and LANL 2017, TA-01, Certificates of Completion Former Los Alamos Inn Property Sites within the Upper Los Alamos Canyon Aggregate Area