State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

August 1, 2017

Doug Hintze, Manager
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Bruce Robinson
Program Director
Environmental Remediation Associate
Los Alamos National Laboratory
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RE: REQUEST FOR CERTIFICATE OF COMPLETION WITHOUT CONTROLS FOR SOLID WASTE MANAGEMENT UNIT 01-001(S3) IN THE UPPER LOS ALAMOS CANYON AGGREGATE AREA
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-17-040

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 Certificate Of Completion Without Controls For Solid Waste Management Unit 01-001(s3) in the Upper Los Alamos Canyon Aggregate Area* (Request), dated June 22, 2017 and referenced by ADEM-17-0146/LAUR-17-24798. The Permittees have requested that solid waste management unit (SWMU) 01-001(s3) be granted a certificate of completion without controls.

SWMU 01-001(s3) was added to the *Los Alamos National Laboratory Hazardous Waste Facility Permit, EPA ID No. NM0890010515* (Permit) in May, 2017. The Permit modification split SWMU 01-001(s2) into two newly-designated SWMUs based on property ownership, i.e., SWMU 01-001(s2) and 01-001(s3). The purpose of the permit modification was to facilitate the completion of corrective actions on the Hutton Team, LLC owned property [SWMU 01-001(s3)]

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prior to completion of corrective actions on the other privately-owned and DOE owned properties. Included as an attachment with the Request is the *Risk-Screening Assessments for Solid Waste Management Unit 01-001(s3)* (Attachment 1). NMED has reviewed and concurs with the conclusions of the risk assessment.

SWMU 01-001(s3) is the portion of the western sanitary waste line (WSWL) located within the Hutton Team, LLC property boundary. The WSWL was connected to most of the processing and production operations in the early history of the laboratory, however, SWMU 01-001(s3) received discharges only from a building that housed administrative offices. The waste line emptied into a septic tank which discharged into Acid Canyon. In 1994 and 1996 a Phase I Resource Conservation and Recovery Act (RCRA) Facility Investigation was conducted to locate the waste line, evaluate potential releases, and remove accessible portions of the waste line. In 2008 investigations were conducted to determine nature and extent of contamination. The risk assessment submitted with the Request was conducted using the data from the 2008 investigation and performed under the 2017 NMED Risk Assessment Guidance for Site Investigations and Remediation (SSG). The risk assessment indicates that no potential unacceptable risks or doses from residual contamination exist for the construction worker and residential land use scenarios. The industrial land use scenario was not evaluated because the site consists of a former buried waste line and releases would have occurred below the relevant depth interval for the industrial scenario. An ecological risk screening assessment was not conducted because releases would have occurred below the relevant depth interval for ecological receptors. Therefore, no complete pathway for ecological receptors exists for this site.

NMED hereby issues certificate of completion without controls for SWMU 01-001(s3) pursuant to Section XXI of the 2016 *Compliance Order on Consent* (Consent Order). 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 this site poses a potential risk to human health or the environment, NMED may require additional corrective action at this site.

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

Sincerely,

John E. Kieling
Chief
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB
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File: Reading and LANL 2017, TA-01, Certificates of Completion SWMU 01-001(s3) within the Upper Los Alamos Canyon Aggregate Area

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