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Date: FEB 0 2 2018
Refer To: ADEM-18-0010

John Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Request for Certificates of Completion for Twenty-three Solid Waste Management Units and Four Areas of Concern in the Delta Prime Site Aggregate Area

Dear Mr. Kieling:

In accordance with Section XXI of the Compliance Order on Consent (the Consent Order), the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) are requesting certificates of completion without controls for the following 12 solid waste management units (SWMUs) and one area of concern (AOC) within the Delta Prime Site Aggregate Area:

- SWMU 21-003, PCB Container Storage Area
- SWMU 21-006(a), Underground Seepage Pit
- SWMU 21-006(b), Brick Manhole, Drainline, and Outfall
- SWMU 21-006(c), Seepage Pit
- SWMU 21-006(d), Seepage Pit
- SWMU 21-022(j), Sump
- SWMU 21-024(b), Septic Tank, Pipelines, and Outfall
- SWMU 21-024(c), Inactive Septic System
- SWMU 21-024(d), Inactive Septic Tank, Pipelines, and Outfall
- SWMU 21-024(g), Inactive Septic System
- SWMU 21-024(k), Inactive Septic Tank, Tile Leach Field, Pipelines, and Outfall
- SWMU 21-024(n), Septic System
- AOC 21-013(f), Surface Disposal Area

SWMUs 21-003, 21-006(a–d), 21-022(j), and 21-024(b,c,d,g,k,n) and AOC 21-013(f) were investigated as part of the Delta Prime Site Aggregate Area investigation. The results of this investigation were reported in the Phase III Investigation Report for Delta Prime Site Aggregate Area at Technical Area 21, Revision 1 (LA-UR-16-24014/EP2016-0049) (hereafter the Phase III IR). The Phase III IR presented the results of all phases of investigation performed at these sites

under the Consent Order. The Phase III IR was approved in the New Mexico Environment Department's (NMED's) September 6, 2015, letter, Approval Phase III Investigation Report for Delta Prime Site Aggregate Area at Technical Area 21, Revision 1 (HWB-LANL-14-076).

The Phase III IR confirms that the nature and extent of contamination are defined or no further sampling is warranted at SWMUs 21-003, 21-006(a–d), 21-022(j), and 21-024(b,c,d,g,k,n) and AOC 21-013(f). In addition, the Phase III IR demonstrates that these SWMUs/AOCs pose no potential unacceptable risks to human health under the industrial, construction worker, and residential scenarios and pose no potential risk to ecological receptors. Therefore, neither site controls nor additional future actions are necessary at the 13 sites.

In addition, DOE and LANS are requesting certificates of completion with controls for the following 10 SWMUs and 4 AOCs:

- SWMU 21-013(a), Surface Disposal Area
- SWMU 21-022(a), Sump and Drainlines
- SWMU 21-022(h), Sump, Drainline, and Outfall
- SWMU 21-023(a), Septic Tank and Drainlines
- SWMU 21-023(b), Septic Tank and Drainlines
- SWMU 21-023(d), Septic Tank and Drainlines
- SWMU 21-024(l), Outfall
- SWMU 21-026(a), Sewage Treatment Plant
- SWMU 21-026(b), Four Sludge Drying/Sand Filter Beds
- SWMU 21-027(a), Surface Drainage and Outfall
- AOC 21-004(a), Aboveground Storage Tank and Associated Lines
- AOC 21-026(c), Dosing Siphon Chamber
- AOC 21-026(d), Dosing Siphon Chamber
- AOC C-21-027, Cooling Tower

SWMUs 21-013(a), 21-022(a,h), 21-023(a,b,d), 21-024(l), 21-026(a,b), and 21-027(a) and AOCs 21-004(a), 21-026(c,d), and C-21-027 were also investigated as part of the Delta Prime Site Aggregate Area and the investigation results for these sites were presented in the NMED-approved Phase III IR.

The Phase III IR confirms that the nature and extent of contamination are defined or no further sampling is warranted at SWMUs 21-013(a), 21-022(a,h), 21-023(a,b,d), 21-024(l), 21-026(a,b), and 21-027(a) and AOCs 21-004(a), 21-026(c,d), and C-21-027. In addition, the Phase III IR demonstrates that the mesa top portions of these SWMUs and AOCs, pose no potential unacceptable risks to human health under the industrial and construction worker scenarios, which are the current and reasonably foreseeable future land uses for the mesa top, and pose no potential risk to ecological receptors. Although SWMUs 21-022(h) and 21-027(a) and AOC C-21-027 potentially pose unacceptable industrial risk and SWMU 21-027(a) also potentially poses unacceptable construction worker risk, the potentially unacceptable risks at these sites are associated with contamination present on steep, inaccessible canyon slopes and there is no potential exposure to these contaminants. Because these 14 sites pose a potential unacceptable risk under the residential scenario, site control is required. The land use will be restricted to industrial use only.

If you have any questions, please contact Kent Rich at (505) 665-4272 (krich@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (Cheryl.rodriguez@em.doe.gov).

Sincerely,

Bruce Robinson, Program Director
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Sincerely,

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