

EMID-700124

DEPARTMENT OF ENERGY

Environmental Management Los Alamos Field Office (EM-LA)
Los Alamos, New Mexico 87544

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



NOV 14 2018

Dear Mr. Kieling:

Subject: Request for Approval of Area of Contamination for the Investigation and Remediation of Technical Area 21

The U.S. Department of Energy (DOE) Environmental Management Los Alamos Field Office (EM-LA) is requesting approval to designate one large area of contamination for the investigation and remediation of solid waste management units (SWMUs) and areas of concern (AOCs) at Los Alamos National Laboratory's Technical Area 21 (TA-21). Proposed boundaries of the area of contamination are shown in Attachment 1. DOE EM-LA is requesting that the area of contamination designation be effective through the completion of the investigation and remediation activities at the site, which are planned to start December 1, 2018, and end December 31, 2022.

The primary purpose of requesting the area of contamination designation is to facilitate staging and segregation of approximately 10,000 yd³ of remediation waste and additional layback and overburden spoils without triggering a new point of generation or a new area of placement of waste subject to Resource Conservation and Recovery Act requirements. Designating this area of contamination will provide flexibility for compliant on-site management of waste while final waste determinations are made and for managing the materials that will be staged until they are returned to their respective excavations. The area of contamination designation will allow for consolidation and sharing of resources among remediation projects, including waste management areas, support facilities, equipment, and personnel. Once remediation/investigation operations and container storage (of both empty and full containers) begin, the project will be limited in the designated areas for staging (including spoils stockpiles) pending characterization. In addition, staging area locations may change during the course of the project. The logistics of the designated staging areas have not been determined yet, and DOE would like the flexibility in making this determination as the project progresses. Once the project starts, or during the course of the project, it may be determined that the area of contamination can be reduced.

Excavated overburden and layback environmental media will be sampled and analyzed as proposed in the approved work plan. The analytical results will be used to ensure that only environmental media with contaminant concentrations that are less than residential soil screening levels will be returned to the point of origin, as proposed in the approved

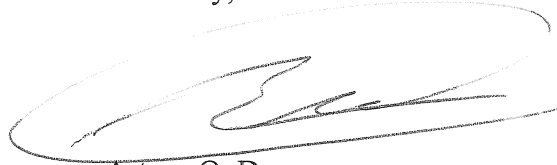
“Investigation Work Plan for Delta Prime Site Aggregate Area Delayed Sites, Revision 1”
(approved by the New Mexico Environment Department on January 11, 2010).

All staging and segregation of waste and environmental media on-site will be conducted in an environmentally protective manner, using a combination of containers and appropriately designed and controlled (e.g., bermed, covered) staging piles. Materials will be containerized and managed in accordance with regulatory requirements upon transfer outside of the area of contamination boundary.

Per Section XIV.B of the Compliance Order on Consent, a plan for sampling is required in case the area within the area of contamination but outside the original SWMU/AOC boundary becomes contaminated. If an area within the area of contamination but outside the original SWMU/AOC boundary becomes contaminated, samples will be collected at the four boundaries and in the center of the potentially contaminated area at two depths and analyzed for constituents detected in the associated waste.

If you have any questions, please contact Duane Parsons at (505) 551-2961
(duane.parsons@em-la.doe.gov) or Cheryl Rodriguez at (505) 665-5330
(cheryl.rodriguez@em.doe.gov).

Sincerely,



Arturo Q. Duran
Designated Agency Manager
Environmental Management
Los Alamos Field Office

Enclosures:

1. Proposed Area of Contamination for TA-21 (EM2018-0071)

cc (letter with enclosure[s]):

E. Day, N3B

C. Rodriguez, EM-LA

cc (letter with electronic enclosure[s]):

M. Erickson, N3B

E. Evered, N3B

J. Legare, N3B

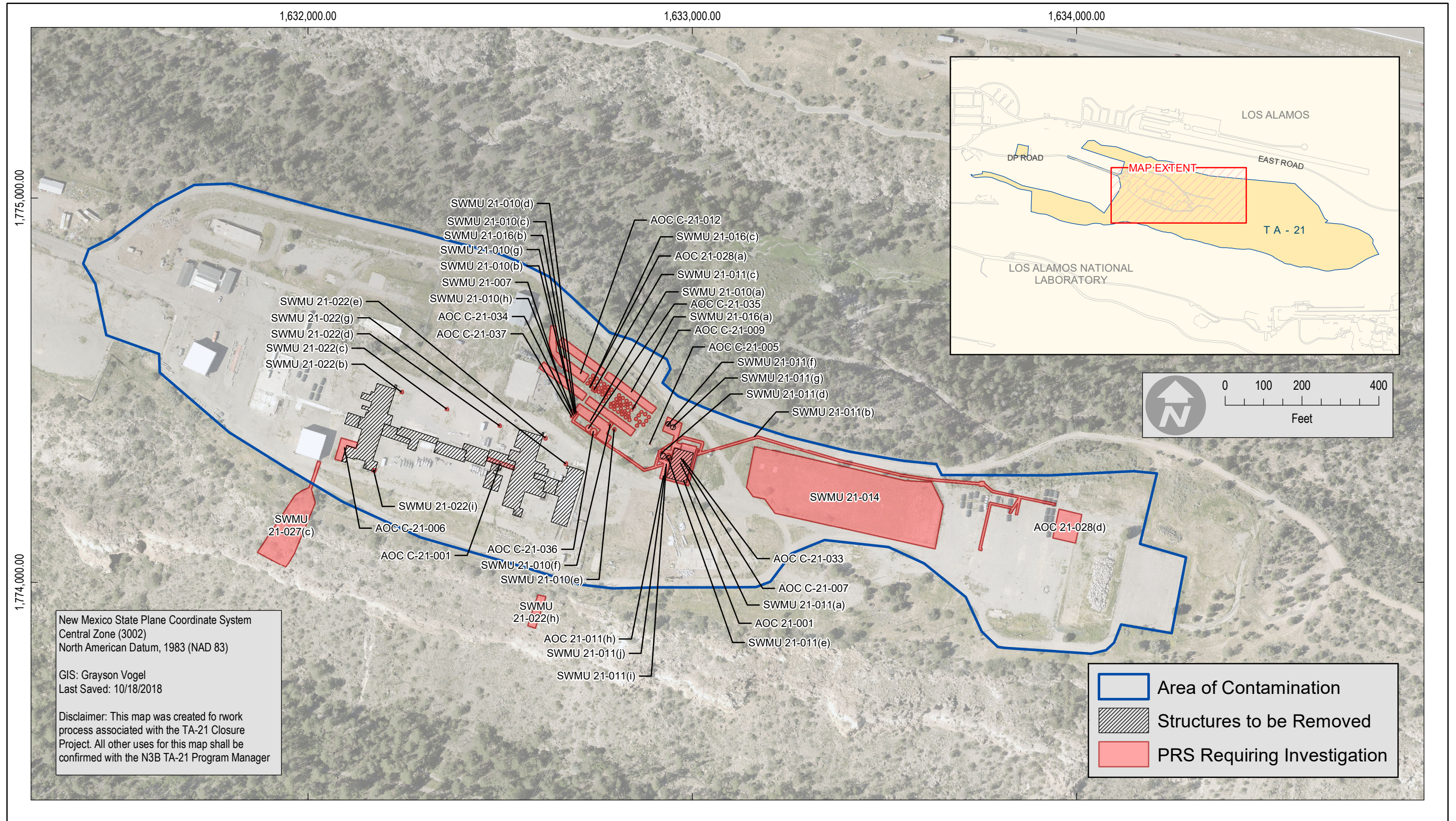
F. Lockhart, N3B

N. Lombardo, N3B

D. Parsons, EM-LA
A. Duran, EM-LA
D. Nickless, EM-LA
D. Rhodes, EM-LA
emla.docs@em.doe.gov
N3B Records
Public Reading Room (EPRR)

EM-LA-40AD-00333

Proposed Area of Contamination for TA-21



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