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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

March 29, 2019

Doug Hintze, Manager  
Environmental Management  
Los Alamos Field Office  
LANL MS-M984  
P.O. Box 1663  
Los Alamos, NM 87545

**RE: APPROVAL**

**CERTIFICATE OF COMPLETION WITHOUT CONTROLS  
AREAS OF CONCERN 57-006 AND 57-007  
TECHNICAL AREA 57 AGGREGATE AREA (FENTON HILL)  
LOS ALAMOS NATIONAL LABORATORY  
EPA ID #NM0890010515  
HWB-LANL-18-069**

Dear Mr. Hintze:

New Mexico Environment Department (NMED) has received the United States Department of Energy's (DOE's) *Request for Certificates of Completion for Two Areas of Concern in the Technical Area 57 Aggregate Area (Fenton Hill)* (Request), dated December 17, 2018 and referenced by EM2018-0133.

Areas of Concern (AOCs) 57-006 and 57-007 were recommended for corrective action complete without controls in the *Investigation Report for Technical Area 57 Aggregate Area (Fenton Hill), Revision 1* (IR) submitted on December 15, 2015. The IR evaluated the risk under a residential and industrial land use scenario but did not evaluate risk to a construction worker. NMED directed DOE to evaluate risk to a construction worker because soil screening levels for some contaminants are lower for the construction worker scenario than the residential land use

scenario. DOE included the results of construction worker scenario in the Request. The results of construction worker evaluation for carcinogenic and non-carcinogenic risk indicate that the sites do not pose unacceptable risk to a construction worker.

NMED calculated a carcinogenic screening value of butyl benzyl phthalate at  $5.38E+4$  rather than 5380 mg/kg listed in Table 3 of the Enclosure for AOC 57-007. However, it would not change the recommendation for the site since DOE used a more conservative value to evaluate risk. In addition, NMED notes that in Table 4, lead was included in the evaluation of non-carcinogenic risk evaluation for AOC 57-007. Because the screening levels for lead are not based on toxicity, but rather on a blood lead level, lead should not have been included in HQs with the other chemicals. Exclusion of lead from the calculation of hazard index will not change the recommendation for the site.

**AOC 57-006** is a former location of plastic-lined 55-gallon waste storage drum that was buried in the ground beneath an analytical chemistry laboratory trailer. Chemicals that could not be discharged to the leach field that was associated with the trailer, were discharged through a special drain to a polyethylene-lined drum. The contents of the drum were transported to the Laboratory for disposal. The drum and the laboratory trailer were removed during a voluntary corrective action conducted in 1994. Additional investigations were conducted in 2014 to further characterize AOC 57-006. The industrial worker scenario was not evaluated for the site because the drum was located beneath the trailer and surface samples were not collected from 0.0-1.0 ft depth interval. Evaluation of human health risk indicates that there is no potential unacceptable risk posed by the site under residential and construction worker land use scenarios. No potential ecological risk to any receptor was identified.

**AOC 57-007** is a leach field at Technical Area (TA) 57 that served a former analytical chemistry laboratory trailer (structure 57-23). The chemistry trailer was used from about 1976 to 1989 to provide support to the geothermal project. A sink in the trailer drained to the leach field and was used to dispose of wastewater associated with chemical analysis. Chemicals that could not be discharged to the leach field because of their toxicity were poured into a special drain that was connected to polyethylene-lined 55-gallon drum (AOC 57-006). Investigations were conducted in 1994 and 2014 to characterize the site. Evaluation of human health risk indicates that there is no potential unacceptable risk posed by the site under residential, industrial, and construction worker land use scenario. No potential ecological risk to any receptor was identified.

In accordance with Section XXI of the 2016 Consent Order, NMED hereby issues certificates of completion without controls for AOCs 57-006 and 57-007 as the sites do not pose unacceptable risk to human health or the environment. Although the corrective action is complete under the Consent Order, DOE must continue to comply with all other applicable state and federal regulations. If new information becomes available that indicates that the sites may pose a risk to human health or the environment, NMED may require DOE to conduct additional corrective action at the site.

Mr. Doug Hintze  
March 29, 2019  
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If you have any questions regarding this correspondence, please contact Neelam Dhawan at (505) 476-6042.

Sincerely,

A handwritten signature in blue ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB  
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File: 2019 LANL, Certificates of Completion, TA-57 Aggregate Area, 57-006 & 57-007