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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 9, 2019

Doug Hintze, Manager
Environmental Management
U.S. Department of Energy
Los Alamos Field Office
P.O. Box 1663 MS M984
Los Alamos, NM 87545

**RE: DISAPPROVAL
REQUEST FOR CERTIFICATE OF COMPLETION WITHOUT CONTROLS
FOR AREA OF CONCERN C-21-001 IN THE DP SITE AGGREGATE AREA
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-18-058**

Dear Mr. Hintze:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) *Request for Certificate of Completion Without Controls for Area of Concern 21-001* in the DP Site Aggregate Area (Request) dated and received November 15, 2019, and referenced by EM-LA-40AD-00347.

Area of Concern (AOC) C-21-001 is described by the DOE as a one-time spill of hydrogen fluoride (HF) inside a corridor in building 21-017 which occurred in the 1950s. However, the information provided in the DOE's references does not provide sufficient information to confirm if the location of the spill was in the corridor of the building, or if it was in the tunnel below the building. Nor does it provide any information on the amount of HF spilled, whether the spill was confined to the building or if came into contact with soil. Also it does not evaluate if other constituents of potential concern (*e.g.*, total analyte (TAL) metals, radioactive materials, or residues from the Teflon used to coat pipes and containers of corrosive substances) were released along with HF at the time of the spill. The references provided do not provide details of the

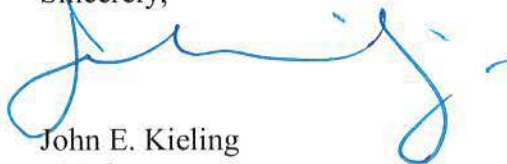
demolition of building 21-017, and it is not clear if corridors or tunnels were also demolished, or if any soil was excavated. The information provided does not address if the nature and extent of the contamination was defined for the site.

NMED met with the DOE on April 17, 2019, to discuss the status of the Request. In this meeting, DOE proposed including AOC C-21-001 in an investigation report (IR) for at Technical Area (TA)-21, that will be submitted in the future, and NMED agreed with this proposal. DOE must address data gaps and evaluate the nature and extent of contamination at AOC C-21-001. Based on the lack of documentation for this AOC C-21-001; DOE must, at a minimum, collect samples at the site and analyze for a full suite of potential contaminants.

The nature and extent of contamination at this site is not defined, and the risk to human health or the environment has not been determined. Without this information, NMED cannot make a determination if corrective action is complete at this site, at this time. NMED hereby issues a disapproval for the DOE's request for a Certificate of Completion without controls for AOC C-21-001.

If you have any questions regarding this letter, please contact Siona Briley at (505) 476-6049.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc:

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File: 2019 LANL, Disapproval Request for Certificate of Completion, AOC C-21-001,
Technical Area 21
LANL-18-058