

## **DEPARTMENT OF ENERGY**

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

EMLA-2020-1184-04-001

Mr. Kevin Pierard Bureau Chief Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505-6313



FEB 1 9 2020

Subject: Request for Certificates of Completion for 31 Solid Waste Management Units and 10 Areas of Concern in the S-Site Aggregate Area

Dear Mr. Pierard:

In accordance with Section XXI of the Compliance Order on Consent (Consent Order), the U.S. Department of Energy (DOE) Environmental Management Los Alamos Field Office (EM-LA) is requesting certificates of completion without controls for the following 30 solid waste management units (SWMUs) and 10 areas of concern (AOCs) within the S-Site Aggregate Area:

- AOC C-11-002, Area of Potential Soil Contamination Associated with Former Building 11-12
- SWMU 11-005(a), Septic System
- SWMU 11-005(b), Septic System
- SWMU 11-005(c), Outfall and Drainline
- SWMU 11-006(a), HE Sump
- SWMU 11-006(b), Catch Basin
- SWMU 11-006(c), Catch Basin
- SWMU 11-006(d), Catch Basin
- SWMU 11-011(b), Outfall and Drainline
- SWMU 11-011(d), Outfall
- SWMU 13-001, Firing Site
- SWMU 13-002, Surface Disposal Area
- SWMU 13-004, Burning Pits
- SWMU 16-001(e), Dry Well
- SWMU 16-003(d), Sumps
- SWMU 16-003(e), Sumps
- SWMU 16-003(g), Sumps
- AOC 16-003(p), Sump
- SWMU 16-004(d), Sludge Drying Bed
- SWMU 16-004(f), Sludge Drying Bed
- SWMU 16-017(w)-99, Former Storage Magazine 16-73
- AOC 16-024(a), Potential Soil Contamination Associated with Former Magazine 16-488
- AOC 16-024(m), Potential Soil Contamination Associated with Former HE Magazine 16-66

- AOC 16-024(n), Potential Soil Contamination Associated with Former Magazine 16-84
- AOC 16-024(u), Potential Soil Contamination Associated with Former Magazine 16-481
- SWMU 16-025(d2), Potential Soil Contamination Associated with Former Building 16-480
- SWMU 16-026(b), Outfall
- SWMU 16-026(c), Outfall
- SWMU 16-026(d), Outfall
- SWMU 16-026(z), Outfall
- SWMU 16-029(b), Sumps
- SWMU 16-029(c), Sumps
- SWMU 16-031(h), Outfall
- SWMU 16-034(m), Potential Soil Contamination Associated with Former Building 16-86
- SWMU 16-035, Potential Soil Contamination Associated with Former Structure 16-476
- SWMU 16-036, Potential Soil Contamination Associated with Former Structures 16-477 and 16-478
- AOC C-16-050, Former Building 16-482
- AOC C-16-060, Former Building 16-479
- AOC C-16-068, Former Building 16-522
- AOC C-16-074, Storage Area

SWMUs 11-005(a), 11-005(b), 11-005(c), 11-006(a), 11-006(b), 11-006(c), 11-006(d), 11-011(b), 11-011(d), 13-001, 13-002, 13-004, 16-001(e), 16-003(d), 16-003(e), 16-003(g), 16-004(d), 16-004(f), 16-017(w)-99, 16-025(d2), 16-026(b), 16-026(c), 16-026(d), 16-026(z), 16-029(b), 16-029(c), 16-031(h), 16-034(m), 16-035, and 16-036 and AOCs 16-003(p), 16-024(a), 16-024(m), 16-024(n), 16-024(u), C-11-002, C-16-050, C-16-060, C-16-068, and C-16-074 were recommended for corrective action complete without controls in the "Supplemental Investigation Report for S-Site Aggregate Area, Revision 1" (hereafter the SIR) (EM2019-0048). The SIR concluded the nature and extent of contamination are defined or no further sampling is warranted at SWMUs 11-005(a), 11-005(b), 11-005(c), 11-006(a), 11-006(b), 11-006(c), 11-006(d), 11-011(b), 11-011(d), 13-001, 13-002, 13-004, 16-001(e), 16-003(d), 16-003(e), 16-003(g), 16-004(d), 16-004(f), 16-017(w)-99, 16-025(d2), 16-026(b), 16-026(c), 16-026(d), 16-026(z), 16-029(b), 16-029(c), 16-031(h), 16-034(m), 16-035, and 16-036 and AOCs 16-003(p), 16-024(a), 16-024(m), 16-024(n), 16-024(u), C-11-002, C-16-050, C-16-060, C-16-068, and C-16-074. In addition, the SIR concluded that the above-mentioned SWMUs and AOCs pose no potential unacceptable risks or doses to human health under the industrial and residential scenarios (including vapor intrusion for the residential scenario) and pose no potential unacceptable risk to ecological receptors. The SIR also concluded that the residential scenario was protective of construction workers for these 40 sites. Therefore, neither site controls nor additional future actions under the Consent Order are necessary at these 40 sites.

In addition, DOE is requesting a certificate of completion with controls for the following SWMU:

• SWMU 16-029(a), Sumps

The SIR concluded the nature and extent of contamination are defined or no further sampling is warranted at SWMU 16-029(a). In addition, the SIR concluded that SWMU 16-029(a) poses no potential unacceptable risk or dose to human health under the industrial scenario and poses no potential unacceptable risk to ecological receptors. The site does pose potential unacceptable human health risk under the residential scenario. Therefore, site controls to prevent future residential land use are necessary at this site.

The SIR, including the recommendations for corrective action complete for the above-listed 41 sites, was approved in the New Mexico Environment Department's "Approval Supplemental Investigation Report for S-Site Aggregate Area, Revision 1" dated October 25, 2019 (HWB-LANL-15-057).

If you have any questions, please contact Kent Rich at (505) 257-7384 (kent.rich@em-la.doe.gov) or Cheryl Rodriguez at (505) 257-7941 (cheryl.rodriguez@em.doe.gov).

Sincerely,

Milla

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

CC (date-stamped letter emailed): Laurie King, EPA Region 6, Dallas, TX Steve Yanicak, NMED DOE OB William Alexander, N3B Brenda Bowlby, N3B Emily Day, N3B Michael Erickson, N3B Erich Evered, N3B Joseph Legare, N3B Dana Lindsay, N3B Frazer Lockhart, N3B Elizabeth Lowes, N3B Pamela Maestas, N3B Glenn Morgan, N3B Kent Rich, N3B David Nickless, EM-LA Cheryl Rodriguez, EM-LA emla.docs@em.doe.gov n3brecords@em-la.doe.gov Public Reading Room (EPRR) PRS Website