

Michelle Lujan Grisham Governor

> Howie C. Morales Lt. Governor

FEB 2 1 2020

NEW MEXICO ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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James C. Kenney Cabinet Secretary

Jennifer J. Pruett Deputy Secretary

Arturo Duran Designated Agency Manager Environmental Management U.S. Department of Energy Los Alamos Field Office P.O. Box 1663 MS M984 Los Alamos, NM 87545

RE: APPROVAL CERTIFICATES OF COMPLETION FOR TWO SOLID WASTE MANAGEMENT UNITS (21-004(B) AND 21-004(C) IN THE DELTA PRIME AGGREGATE AREA EAST LOS ALAMOS NATIONAL LABORATORY EPA ID #NM0890010515 HWB-LANL-19-067

Dear Mr. Duran:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) *Request for Certificates of Completion for Two Solid Waste Management Units in the Delta Prime Aggregate Area at Delta Prime East* dated and received October 24, 2019, and referenced by EMLA-2020-1013.

The two solid waste management unit (SWMU) 21-004(b) and 21-004(c) were investigated and the investigation results were included in the *Investigation Report DP Site Aggregate Area Sites at DP East, Revision 1* (IR) that was submitted on December 19, 2018, and approved by NMED December 28, 2018.

SWMU 21-004(b) was part of consolidated unit 21-004(b)-99 which consisted of two tank structures (21-0346) which consisted of two stainless steel tanks (SWMU 21-004(b)) and (SWMU 21-004(c)) and a cemented bermed area and drainlines (AOC 21-004(d)). The stainless-steel tanks were installed in 1979 and were used as an overflow holding tank for liquid waste from the chilled water systems and from the Laboratory and radionuclide experimental operations in the Tritium Systems Test Assembly (TSTA) facility building (21-0155). Each tank was 9 ft high and 8 ft in diameter with a capacity of 3,000 gal. The tanks were mounted on steel legs above the surface of an asphalt bermed area. The bermed area has a capacity of 9,600 gal. and measured 36 ft long by 18 ft wide. The tanks and asphalt were removed during investigation activities, and the site has been backfilled to the surrounding site grade and seeded.

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Mr. Duran Page 2

Investigations were conducted in 1988, 1994, and 2011 to define the nature and extent of contamination. Although tritium was detected, the DOE did not sample for vapor-phase tritium at this location, and presence or absence of vapor-phase tritium is not known. Risks were evaluated in the IR, and results indicate that SWMU 21-004(b) does not pose an unacceptable risk to human health under the residential, industrial land use, and construction worker scenarios. The results of ecological risk screening indicate that the site does not pose an unacceptable risk to the environment.

SWMU 21-004(c) was part of consolidated unit 21-004(b)-99 which consisted of two tank structures (21-0346) which consisted of two stainless steel tanks (SWMU 21-004(b)) and (SWMU 21-004(c)) and cemented bermed area and drainlines (AOC 21-004(d)). The stainless-steel tanks were installed in 1979 and were used as an overflow holding tank for liquid waste from the chilled water systems and from the Laboratory and radionuclide experimental operations in the Tritium Systems Test Assembly (TSTA) facility building (21-0155). Each tank was 9 ft high and 8 ft in diameter with a capacity of 3,000 gal. The tanks were mounted on steel legs above the surface of an asphalt bermed area. The bermed area has a capacity of 9,600 gal. and measured 36 ft long by 18 ft wide. The tanks and asphalt were removed during investigation activities, and the site has been backfilled to the surrounding site grade and seeded.

Investigations were conducted in 1988, 1994, and 2011 to define the nature and extent of contamination. Although tritium was detected, the DOE did not sample for vapor-phase tritium at this location, and presence or absence of vapor-phase tritium is not known. Risks were evaluated in the IR, and results indicate that SWMU 21-004(c) does not pose an unacceptable risk to human health under the residential, industrial land use, and construction worker scenarios. The results of ecological risk screening indicate that the site does not pose an unacceptable risk to the environment.

NMED hereby issues certificates of completion without controls for SWMU 21-004(b) and SWMU 21-001(c). If new information becomes available that indicates that the site may pose an unacceptable risk to human health or the environment, NMED may require the DOE to conduct additional investigations and/or corrective action at this site.

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

Sincerely,

Kevin Pierard Chief Hazardous Waste Bureau

cc:

N. Dhawan, NMED HWB S. Briley, NMED HWB S. Holcomb, NMED SWQB M. Green, NMED DOE OB L. King, US EPA Region 6 C. Rodriguez, DOE-EM-LA E. Lowes, N3B K. Rich, N3B Mr. Duran Page 3

> E. Day, N3B K. Roger, DOE NNSA P. Maestas, N3B W. Alexander, N3B <u>emla.docs@em.doe.gov</u>

File: 2020 LANL, Certificates of Completion for SWMU 21-004 (b) and SWMU 21-004(c) in the Delta Prime Site Aggregate Area at Delta Prime East, Technical Area 21 LANL-19-067