**DEPARTMENT OF ENERGY**

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

**MAR 05 2020**

EMLA-2020-1305-02-001

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



**Subject:** Request for Approval of Area of Contamination for the Retrieval of Corrugated Metal Pipes [Solid Waste Management Unit 54-015(k)] at Technical Area 54

Dear Mr. Pierard:

The U.S. Department of Energy Environmental Management Los Alamos Field Office (EM-LA) is requesting approval to designate one large area of contamination in support of retrieval of corrugated metal pipes (CMPs) in Solid Waste Management Unit (SWMU) 54-015(k) located at Technical Area 54 (TA-54). Proposed boundaries of the area of contamination are shown in Attachment 1. EM-LA is requesting that the area of contamination designation be effective through the completion of the CMP retrieval activities at the site, which are planned to start July 1, 2020, and end August 31, 2022.

The primary purpose of requesting the area of contamination designation is to facilitate the retrieval of the 158 transuranic/hazardous CMPs and overburden soils 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 the CMPs and for managing the materials that will be staged until they are returned to the excavation site.

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. All waste and materials will be protectively packaged (e.g., containerized, double plastic wrapped in preparation for processing, etc.) and managed in accordance with regulatory requirements upon removal from the area of contamination boundary.

Per Section XIV.B of the 2016 Compliance Order on Consent, a description of additional confirmatory sampling is required in case the area outside the original SWMU boundary but within the area of contamination becomes contaminated. If an area outside the original SWMU boundary but within the area of contamination becomes contaminated, samples will be collected at two depths to determine the extent of contamination at the potentially contaminated area and analyzed for the constituents assigned to the CMPs.

If you have any questions, please contact Christian Maupin at (505) 695-4281 (christian.maupin@em-la.doe.gov) or Lee Bishop at (505) 257-7902 (lee.bishop@em.doe.gov).

Sincerely,



Arturo Q. Duran  
Compliance and Permitting Manager  
Environmental Management  
Los Alamos Field Office

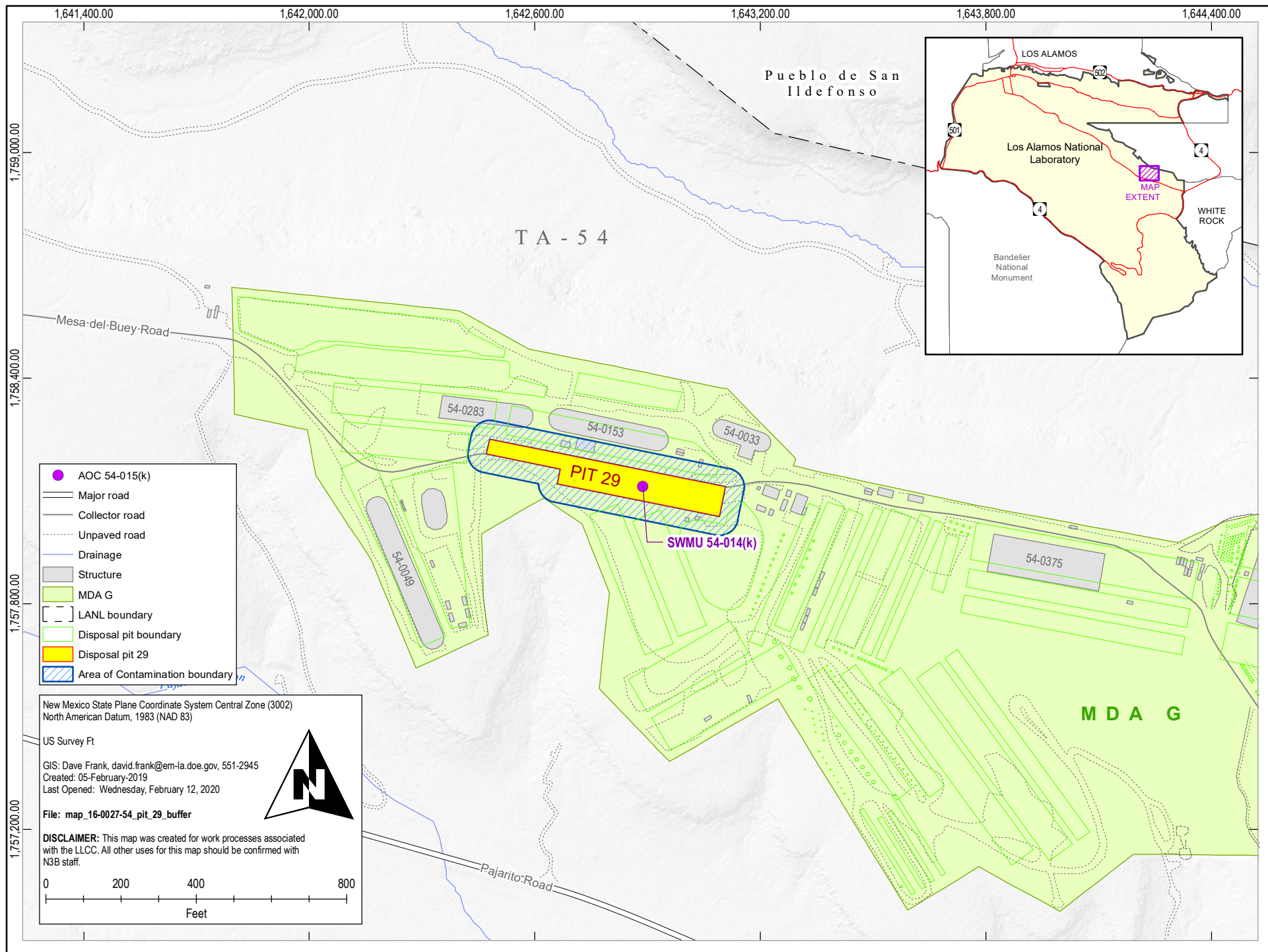
Enclosures:

1. Two hard copies with electronic files – Proposed Area of Contamination for SWMU 54-015(k) at TA-54 (EM2020-0091)

CC (letter and enclosure[s] emailed):

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**Proposed Area of Contamination for SWMU 54-015(k) at TA-54**