



**Michelle Lujan Grisham**  
Governor

**Howie C. Morales**  
Lt. Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

**Hazardous Waste Bureau**  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6313  
Phone (505) 476-6000 Fax (505) 476-6030  
[www.env.nm.gov](http://www.env.nm.gov)



**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

November 18, 2020

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  
CERTIFICATE OF COMPLETION WITHOUT CONTROLS FOR ONE SOLID WASTE MANAGEMENT  
UNIT (06-003(C)) IN THE TWOMILE CANYON AGGREGATE AREA  
LOS ALAMOS NATIONAL LABORATORY  
EPA ID #NM0890010515  
HWB-LANL-20-007**

Dear Mr. Duran:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) *Response to Approval of Certificate of Completion for One Solid Waste Management Unit in the Twomile Canyon Aggregate Area* (Request) dated and received November 2, 2020 and referenced by EMLA-2021-0009-02-001 (Response).

**Document History**

On February 19, 2020, the DOE submitted *Request for Certificate of Completion for One Solid Waste Management Unit in the Twomile Canyon Aggregate Area* dated February 19, 2020, referenced by EMLA-2020-1186-04-001 (Initial Request). DOE requested a Certificate of Completion (CoC) without controls for solid waste management unit (SWMU) 06-003(c). On August 31, 2020, NMED issued a CoC with controls, based on the risk screening provided, and restricted the land use to only industrial use. DOE submitted this Response which provides additional information on risk screening that was not included in the DOE's Initial Request.

**Investigation History**

The SWMU 06-003(c) was initially investigated in 1994, and the investigation results were included in the *Report for Potential Release Sites at TAs 6, 8, 22, and 40 (Located in Former OUs 1111, 1157)* submitted on September 29, 1997, and was reviewed by NMED on June 30, 1998.

Risk assessments for human health and ecological risk were included in the *Response to Request for Supplemental Information for the RCRA Facility Investigation Report (RFI) for Potential Release Sites in the Eastern and Western Aggregates at Technical Area (TA)-6* (RSI), dated January 18, 2000. The ecological risk was conducted for the entire Aggregate Areas. At NMED's direction, DOE re-evaluated the ecological risk for this individual SWMU and included it in the Initial Request. In the Response the DOE has re-evaluated the human health risk for the residential land use scenario.

**SWMU 06-003(c)** is a former firing site which consisted of an asphalt pad measuring 40 ft wide by 60 ft long and included a rectangular concrete-lined pit measuring 2 ft wide by 5 ft long and 2 ft deep. The firing site was installed in 1944 and was used for water recovery shot testing using high explosive (HE), depleted uranium and cobalt. The SWMU was decommissioned after 1944 and was found to have elevated levels of uranium in the 1978 radiation survey.

Investigations were conducted in 1994 to define the nature and extent of contamination. Although Uranium-234, -235/236 and -238 were detected, they were below the DOE's annual effective dose rate limit of 20 mrem/yr. The results of risk screening provided in the RSI indicate that SWMU 06-003(c) does not pose an unacceptable risk to human health under the industrial land use and construction worker scenarios. The Response provided a justification for recalculated hazard index of 0.947 under the residential land use scenario. The results of the human health screening and the ecological risk screening indicate that the site does not pose an unacceptable risk to human health or the environment.

NMED notes that:

1. For clarity, DOE should have provided reference of the *Meeting Minutes, Upper Sandia Canyon and Three Mile Canyon Supplemental Investigation Reports Technical Meeting* dated February 22, 2017. The agreement allows for use of additional lines of evidence to justify removing constituents of potential concern (COPCs) above background values with several non-detects from risk calculations.
2. After providing justification, DOE removed some COPCs from the risk calculation, but failed to include revised risk screening table. A revised table should have been included providing the revised HI.

NMED has reviewed the re-evaluated risk screening and hereby issues a certificate of completion without controls for SWMU 06-003(c). If new information becomes available that indicates that the site may pose an unacceptable risk to human health or the environment under residential, industrial or construction land use scenario, NMED may require 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 M. Pierard, Chief  
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB

S. Briley, NMED HWB  
S. Holcomb, NMED SWQB  
C. Catechis, NMED DOE OB  
L. King, US EPA Region 6  
C. Rodriguez, DOE-EM-LA  
E. Day, N3B  
K. Rich, N3B  
P. Maestas, N3B  
W. Alexander, N3B  
[emladocs@em.doe.gov](mailto:emladocs@em.doe.gov)

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