



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



EMLA-2021-0208-02-001

April 28, 2021

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 Certificates of Completion for 34 Solid Waste Management Units and
5 Areas of Concern in the Upper Cañada del Buey 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) is requesting certificates of completion without controls for the following 27 solid waste management units (SWMUs) and 5 areas of concern (AOCs) within the Upper Cañada del Buey Aggregate Area:

- SWMU 04-003(a), Outfall Associated with Former Photo-Processing Building 4-07
- AOC 04-004, Soil Contamination from Former Photo-Processing Building 4-07
- SWMU 46-003(b), Septic System
- SWMU 46-003(c), Septic System
- SWMU 46-003(d), Septic System
- SWMU 46-003(e), Septic System
- SWMU 46-003(f), Septic System
- SWMU 46-003(g), Septic System
- SWMU 46-004(a), Waste Line
- SWMU 46-004(a2), Outfall Associated with Building 46-31
- SWMU 46-004(b), Soil Contamination Associated with Former Tank
- SWMU 46-004(c2), Outfall from Building 46-1
- SWMU 46-004(d2), Soil Contamination from Stack Emissions
- AOC 46-004(e2), Outfall from Building 46-42
- SWMU 46-004(f), Drain Associated with Building 46-24
- AOC 46-004(f2), Outfall from Building 46-31
- SWMU 46-004(r), Outfall from Building 46-24
- SWMU 46-004(s), Outfall Associated with Building 46-1
- SWMU 46-004(v), Outfall from Building 46-87

- SWMU 46-004(w), Outfall from Building 46-59
- SWMU 46-004(x), Outfall from Building 46-31
- SWMU 46-004(y), Outfall from Building 46-31
- SWMU 46-004(z), Outfall from Building 46-31
- SWMU 46-005, Surface Impoundment
- SWMU 46-006(c), Operational Release
- SWMU 46-007, Operational Release
- SWMU 46-008(a), Storage Area
- SWMU 46-008(e), Storage Area
- SWMU 46-008(f), Storage Area
- SWMU 46-009(b), Surface Disposal Site
- AOC C-46-002, Soil Contamination from Stack Emissions – Non-intentional release
- AOC C-46-003, Soil Contamination from Stack Emissions – Non-intentional release

SWMUs 04-003(a), 46-003(b), 46-003(c), 46-003(d), 46-003(e), 46-003(f), 46-003(g), 46-004(a), 46-004(a2), 46-004(b), 46-004(c2), 46-004(d2), 46-004(f), 46-004(r), 46-004(s), 46-004(v), 46-004(w), 46-004(x), 46-004(y), 46-004(z), 46-005, 46-006(c), 46-007, 46-008(a), 46-008(e), 46-008(f), and 46-009(b) and AOCs 04-004, 46-004(e2), 46-004(f2), C-46-002, and C-46-003 were recommended for corrective action complete without controls in the “Supplemental Investigation Report for Upper Cañada del Buey Aggregate Area, Revision 1” (hereafter the SIR) (EM2020-0267). The SIR confirms the nature and extent of contamination are defined or no further sampling is warranted at SWMUs 04-003(a), 46-003(b), 46-003(c), 46-003(d), 46-003(e), 46-003(f), 46-003(g), 46-004(a), 46-004(a2), 46-004(b), 46-004(c2), 46-004(d2), 46-004(f), 46-004(r), 46-004(s), 46-004(v), 46-004(w), 46-004(x), 46-004(y), 46-004(z), 46-005, 46-006(c), 46-007, 46-008(a), 46-008(e), 46-008(f), and 46-009(b) and AOCs 04-004, 46-004(e2), 46-004(f2), C-46-002, and C-46-003. In addition, the SIR demonstrates that the above-mentioned SWMUs and AOCs pose no potential unacceptable risks or doses to human health under the industrial, construction worker, and residential scenarios and pose no potential unacceptable risk to ecological receptors. Therefore, neither site controls nor additional future actions under the Consent Order are necessary at these 32 sites.

In addition, DOE is requesting certificates of completion with controls for the following seven SWMUs:

- SWMU 46-004(d), Dry Well
- SWMU 46-004(e), Dry Well
- SWMU 46-004(g), Drains and Exhaust System
- SWMU 46-006(a), Operational Release
- SWMU 46-008(d), Storage Area
- SWMU 46-009(a), Landfill
- SWMU 46-010(d), Storage Area

SWMUs 46-004(d), 46-004(e), 46-004(g), 46-006(a), 46-008(d), 46-009(a), and 46-010(d) were recommended for corrective action complete with controls in the SIR. The SIR confirms the nature and extent of contamination are defined or no further sampling is warranted at SWMUs 46-004(d), 46-004(e), 46-004(g), 46-006(a), 46-008(d), 46-009(a), and 46-010(d). In addition, the SIR concluded that these seven SWMUs pose no potential unacceptable risk or dose to human health under the industrial and construction worker scenarios and pose no potential unacceptable risk to ecological receptors. The sites do pose potential unacceptable human health risk under the residential scenario. Therefore, site controls to prevent future residential land use are necessary at these sites.

The SIR, including the recommendations for corrective action complete for the above-listed 39 sites, was approved in the New Mexico Environment Department's letter "Approval Supplemental Investigation Report for Upper Cañada del Buey Aggregate Area, Revision 1" dated March 4, 2021 (HWB-LANL-16-039).

If you have any questions, please contact Kent Rich at (505) 660-6570 (kent.rich@em-la.doe.gov) or Cheryl Rodriguez at (505) 414-0450 (cheryl.rodriguez@em.doe.gov).

Sincerely,

**Arturo Q.
Duran**

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Arturo Q. Duran
Compliance and Permitting Manager
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