



March 16, 2022

Arturo Duran
Designated Agency Manager
DOE-Environmental Management
Los Alamos Field Office
1200 Trinity Drive, Suite 400
Los Alamos, NM 87544

**RE: REQUEST FOR ADDITIONAL INFORMATION
AREA OF CONTAMINATION DESIGNATION FOR THE RETRIEVAL OF CORRUGATED METAL PIPES
AT SWMU 54-015(K), TECHNICAL AREA 54
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
LANL-MISC**

Dear Arturo Duran:

The New Mexico Environment Department (NMED) has received the United States Department of Energy Environmental Management Los Alamos Field Office (DOE-EM) *Revised 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* (Revised Request), dated February 14, 2022 and referenced by EMLA-2022-BF046-02-001.

Initially, on March 5, 2020, the DOE-EM submitted the *Request for Approval of Area of Contamination for the Retrieval of Corrugated Metal Pipes [Solid Waste Management Unit (SWMU) 54-015(k)] at Technical Area 54* (Request), referenced by EMLA-2020-1305-02-001. On March 23, 2020, NMED had a conference call with the DOE-EM and Newport News Nuclear BWXT-Los Alamos (N3B) to discuss the Request. Based on these discussions and NMED direction, DOE has submitted the Revised Request.

DOE is requesting approval of area of contamination (AOC) designation to support retrieval of corrugated metal pipes (CMPs) buried at solid waste management unit (SWMU) 54-015(k) at Technical Area 54. The AOC will facilitate the retrieval of 158 transuranic/hazardous waste CMPs and overburden soils without creating a new point of generation or triggering land disposal restrictions or minimum technology requirements. It will allow for a compliant management of potentially hazardous materials until a determination can be made whether these materials can be returned to the excavated site or should be disposed off-site.

In accordance with Section XIV of the 2016 Compliance Order on Consent, DOE may request the AOC designation from NMED in advance of implementation of any work within the AOC. The DOE-EM has provided the description of activities to be conducted within the AOC, a map depicting the boundary of the AOC. However, DOE has not provided a description of additional confirmatory sampling to be performed within the AOC, but outside the boundary of the original SWMU, if the area becomes contaminated. Please provide a sampling plan for collection of confirmatory samples from the area outside of the SWMU boundary and within the AOC boundary.

NMED notes that the CMPs were originally packaged with cemented waste, however, the cemented waste has previously dewatered at LANL following long-term storage. After the CMPs are retrieved, the DOE-EM must ensure that CMPs are stored on secondary containment unless it is verified either through visual inspection or through real time radiography (RTR) that the CMPs do not contain any free liquids. Additionally, due to the history of dewatering of cemented waste at Laboratory, samples must also be collected from the soil beneath the CMPs prior to placement of overburden back into the pit.

DOE-EM must provide additional information within 30-days of the receipt of this letter. In the future, please ensure that HWB LANL Permitting Group leader, Neelam Dhawan, is copied on the correspondence and a redline version is provided to NMED to facilitate the review of revised documents.

If you have any questions regarding this correspondence, please contact Siona Briley at (505) 690-5160 or by email at siona.briley@state.nm.us

Sincerely,



Rick Shean
Chief
Hazardous Waste Bureau

cc:

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File: 2021 LANL Permit, TA-54 Area of Contamination for the Retrieval of Corrugated Metal Pipes
(SWMU 54-015(k))
LANL-MISC