



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

EMLA-2022-BF080-02-001

April 12, 2022

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



Subject: Response to New Mexico Environment Department Request for Additional Information Area of Contamination Designation for the Retrieval of Corrugated Metal Pipes at SWMU 54-015(k), Technical Area 54

Dear Mr. Shean:

On March 16, 2022, the U.S. Department of Energy (DOE) Environmental Management Los Alamos Field Office (EM-LA) received the New Mexico Environment Department (NMED) "Request for Additional Information Area of Contamination Designation for the Retrieval of Corrugated Metal Pipes at SWMU 54-015(k), Technical Area 54." In the letter, NMED requested additional information be provided within 30 days of the receipt of the letter regarding the retrieval of the 158 corrugated metal pipes (CMPs). A meeting was held on March 23, 2022, between NMED, EM-LA, and Newport News Nuclear BWXT-Los Alamos, LLC (N3B) to discuss the additional information being requested by NMED. NMED's information requested and EM-LA's response based upon the March 23, 2022, meeting is provided below.

To facilitate review of this response, NMED's comments included in the March 16, 2022, letter are included verbatim (in italics) below. Each request is followed with a response from EM-LA.

NMED Comment

- 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 with the AOC boundary.*

EM-LA Response

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 solid waste management unit (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 within the contaminated area at two depths to determine the extent of contamination at the potentially contaminated area. The samples will be analyzed for the constituents assigned to the CMPs. EM-LA notes that contamination outside of the SWMU boundary but within the area of contamination is not expected to occur as the result of standard operations. As agreed upon in the March 23, 2022, meeting, a sample analysis plan will not be submitted that describes the collection of confirmatory sampling. Instead, EM-LA will initially clean up known contaminated soil and manage it as mixed waste by assigning hazardous waste numbers from the CMP waste stream. EM-LA will meet with NMED after the contaminated soil has been containerized to agree on confirmatory sampling to be performed after the contaminated soil has been containerized.

NMED Comment

- 2. 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.*

EM-LA Response

EM-LA has implemented the use of certified IP-1 hazardous waste bags. IP-1 hazardous waste bags are able to contain free liquids released from a CMP. Visual inspection will occur at multiple stages during CMP retrieval. The CMPs will be visually inspected before removal of the CMP from the excavation area. CMPs will also be visually inspected, once excavated, at a designated operational area when the CMPs are placed into an IP-1 hazardous waste bag. EM-LA will store CMPs in accordance with Part 3, Storage in Containers, of the Los Alamos National Laboratory (LANL) Hazardous Waste Permit.

NMED Comment

- 3. Additionally, due to the history of dewatering of cemented waste at Laboratory, samples must also be collected from soil beneath the CMPs prior to placement of overburden back into the pit.*

EM-LA Response

Sampling the soil beneath the CMPs is described in Section 4.3 of the “Corrugated Metal Pipe Soil Management Plan,” N3B-PLAN-TRU-1033. The CMP Soil Management Plan was submitted to NMED in the “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,” on February 14, 2022. As described in Section 4.3 of the CMP Soil Management Plan, soil sampling is not required below the CMP excavation either before or following the CMP retrieval activities unless contamination related to the CMPs (i.e., due to a spill/release from the CMPs during the retrieval and/or packaging process) is detected or suspected within soil underlying the CMP excavation in Pit 29. Intrusion into the 4 ft of

overburden above Pit 29 will be sampled only to a maximum depth of 6 in. because of the presence of hazardous waste in Pit 29 and also because the soil stability of the Pit 29 overburden is unknown. If contaminated soils are determined to be present, they will be marked via the Global Positioning System and noted on the CMP retrieval restoration map for consideration during site closure. This project is not to determine contamination of the Pit 29 overburden soil, which will be evaluated during the closure of Technical Area 54.

If you have any questions, please contact Christian Maupin at (505) 695-4281 (christian.maupin@em-la.doe.gov) or M. Lee Bishop at (702) 218-4460 (lee.bishop@em.doe.gov).

Sincerely,

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Arturo Q. Duran
Compliance and Permitting Manager
US. Department of Energy
Environmental Management
Los Alamos Field Office

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