



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

EMLA23-BF141-2-1

March 30, 2023

Mr. Dave Cobrain
 Acting Bureau Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, NM 87505-6303



Dear Mr. Cobrain:

Subject: Request for Certificate of Completion for Solid Waste Management Unit 00-030(g) in the Pueblo Canyon Aggregate Area

- Reference(s):**
1. Document LA-UR-00-5378, "RFI Report for SWMU 0-030(g)," dated February 2001
 2. Letter HWB-LANL01-003J. Young to P. Nanos, "Approval of RCA Facility Investigation Report for Solid Waste Management Unit 00-030(g) Los Alamos National Laboratory EPA ID #: NM0890010515 Task #," dated April 29, 2003
 3. Document LA-UR-04-2714, "Los Alamos and Pueblo Canyons Investigation Report," dated April 2004
 4. Document LA-UR-05-9230, "Los Alamos and Pueblo Canyons Supplemental Investigation Report," dated December 2005
 5. Letter HWB-LANL-04-006, J. Bearzi to D. Gregory and P. Nanos, "Approval as Modified Los Alamos and Pueblo Canyons Investigation Report," dated May 11, 2005
 6. Letter HWB-LANL-06-014, J. Bearzi to D. Gregory and D. McInroy, "Approval with Direction Los Alamos and Pueblo Canyons Supplemental Investigation Report," dated August 30, 2007

In accordance with Section XXI of the 2016 Compliance Order on Consent (Consent Order), the U.S. Department of Energy (DOE) is requesting a certificate of completion without controls for the following solid waste management unit (SWMU) within the Pueblo Canyon Aggregate Area:

- SWMU 00-030(g), Former Septic Tank (near old Catholic Church parking lot)

SWMU 00-030(g) was previously recommended for no further action (NFA) in the Resource Conservation and Recovery Act (RCRA) facility investigation (RFI) report for SWMU 0-030(g) (Reference 1). Because SWMU 00-030(g) consists of mesa-top and drainage channel components, the RFI evaluated risk for these two areas separately, based on differing land use (residential for the mesa-top component and recreational for the drainage channel component). The RFI report substantiated that the mesa-top portion of the site did not pose an unacceptable human health risk or dose under the residential scenario and the drainage channel portion of the site did not pose an unacceptable human health risk or dose under the recreational scenario. The RFI report also substantiated that the site did not pose an unacceptable risk to ecological receptors.

The New Mexico Environment Department (NMED) approved the RFI report on April 29, 2003 (Reference 2). In the approval, NMED concurred that the site did not pose an unacceptable risk to human health or the environment, but did not concur with the recommendation for NFA. NMED identified a concern over contaminant releases from the site to the downstream canyon system and indicated that NFA could not be approved until contaminant releases downstream of the site had been characterized and any risks mitigated.

The characterization of potential canyon contamination referenced in NMED's letter dated April 29, 2003 (Reference 2) has since been completed and documented in the Los Alamos and Pueblo Canyons Investigation Report (IR; Reference 3). The IR identified SWMU 00-030(g) as a potential source of contamination to Acid Canyon (a tributary to Pueblo Canyon). The investigation included sampling in canyon reach AC-1 upstream of the site, and canyon reach AC-2 downstream of the site, to characterize potential releases from the site. The sampling results indicated concentrations of inorganic and organic chemicals and radionuclides in sediment samples from reach AC-2 were equivalent or lower than concentrations in samples from reach AC-1. For some constituents, data from samples collected at SWMU 00-030(g) were available and concentrations decreased downgradient at reach AC-2. Thus, the results from the IR show that releases from SMWU 00-030(g) have been fully characterized.

The human health risk evaluations in the IR were refined in the 2005 supplement to the IR (Reference 4). The risk evaluations showed no unacceptable human-health risk in reach AC-2 based on the recreational scenarios (trail user and extended backyard) and no unacceptable risk to construction workers. There was potential unacceptable risk in reach AC-2 for the residential scenario based on arsenic and polycyclic aromatic hydrocarbons (PAHs). The risk for reach AC-2, however, was lower than for reach AC-1 and concentrations of arsenic and PAHs decreased from reach AC-1 to AC-2. The unacceptable risk does not appear to be associated with SWMU 00-030(g). The IR also demonstrated no unacceptable risk to ecological receptors. Based on the results of the IR and supplement, there are no unacceptable risks in the canyon downstream of SWMU 00-030(g). The IR was approved by NMED in the May 11, 2005, letter, "Approval as Modified [for the] Los Alamos and Pueblo Canyons Investigation Report" (Reference 5). NMED approved the supplemental report in "Approval with Direction [for the] Los Alamos and Pueblo Canyons Supplemental Investigation" (Reference 6), dated August 30, 2007.

The human-health risk assessments performed during the timeframe of the RFI report did not evaluate vapor intrusion into buildings. NMED now requires vapor intrusion to be evaluated if residential land use is a possibility. Because the current land use of the mesa-top portion of SWMU 00-030(g) is residential and residential structures are located nearby, the vapor intrusion pathway was evaluated. The results of the RFI sampling presented in the RFI report show that no volatile and toxic organic chemicals were detected in samples collected from the mesa top. Volatile and toxic organic chemicals were detected in samples collected in the drainage channel portion, but the drainage channel is not suitable for placement of a structure. Therefore, the vapor intrusion pathway is not complete for SWMU 00-030(g) and vapor intrusion into buildings was not evaluated.

The current and reasonably foreseeable future land use at SWMU 00-030(g) is residential for the mesa-top portion and recreational for the drainage channel portion. Based on topography, residential use of the drainage channel portion of the site is not feasible. No administrative and/or physical controls under the Consent Order would be necessary to prevent residential use of the drainage channel portion of the site.

On the basis of the RFI report and IR and supplement, neither site controls nor additional future actions under the Consent Order are necessary at SWMU 00-030(g).

If you have any questions, please contact Christian Maupin at (505) 695-4281 (christian.maupin@em-la.doe.gov) or Cheryl Rodriguez at (505) 414-0450 (cheryl.rodriguez@em.doe.gov).

Sincerely,

**ARTURO
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Arturo Q. Duran
Compliance and Permitting Manager
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