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Date: **JUN 28 2012**
Refer To: EP2012-0155

John Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Request for Certificates of Completion for Three Solid Waste Management Units in the Guaje/Barrancas/Rendija Canyons Aggregate Area

Dear Mr. Kieling:

In accordance with Section VII.E.6.b of the March 1, 2005, Compliance Order on Consent (the Consent Order), Los Alamos National Security (LANS), LLC, and the U.S. Department of Energy (DOE) are requesting Certificates of Completion without Controls for the following three solid waste management units (SWMUs) within the Guaje/Barrancas/Rendija Canyons Aggregate Area:

SWMU 00-011(a), Former Mortar Impact Area
SWMU 00-011(d), Mortar Impact Area
SWMU 00-011(e), Mortar Impact Area

Each of these three sites was recommended for Corrective Action Complete without Controls in the report entitled *Investigation Report for Guaje/Barrancas/Rendija Canyons, Revision 1* (LA-UR-07-7820/EP2007-0720). The report confirmed that the nature and extent of contamination are defined at each of the above-referenced sites and demonstrated that each site does not pose an unacceptable risk or dose to human health under the residential scenario from Resource Conservation and Recovery Act constituents. In addition, the report demonstrated that each of the above sites does not pose a potential risk to ecological receptors. Therefore, neither site controls nor additional future actions under the Consent Order are necessary at the three SWMUs.

In December 2007, the New Mexico Environment Department (NMED) issued an *Approval with Direction [for the] Investigation Report for Guaje/Barrancas/Rendija Canyons, Revision 1* (HWB-LANL-06-014). The approval with direction (AWD) required Los Alamos National Laboratory (the Laboratory) to conduct biennial visual surveys “[due] to the uncertainty associated with any munitions and explosives of concern (MEC)...at the former firing sites [SWMUs 00-011(a, c, d, and e)] and area of concern (AOC) C-00-020 to identify and remove any MEC or munitions debris....” The Laboratory has since conducted two ordnance surveys, in 2009 and 2011, the results of which are reported in the *2009 Biennial Ordnance Survey Report* (December 2009, LA-UR-09-8186/EP2009-0684) and the *2011 Biennial Ordnance Survey Report*



(December 2011, LA-UR-11-6766/EP2011-0383). Small fragments of munitions debris and any munitions and explosives of concern found at SWMUs 00-011(a, d, and e) were removed. However, no unexploded ordnance was found at SWMUs 00-011(a, c, d, and e) and Area of Concern (AOC) C-00-020. Given the findings of the 2007 investigation report and the results of the 2009 and 2011 surveys, DOE/LANS believe the requirements of the 2007 AWD have been satisfied, and therefore, additional visual surveys are unnecessary under the Consent Order. Furthermore, in a letter dated May 16, 2012, NMED granted a Certificate of Completion without Controls for SWMU 00-011(c) and AOC C-00-020, two of the five sites where biennial surveys were required.

NMED's 2007 AWD also required DOE/LANS to monitor stormwater at each of the subject sites. This requirement predates the effective date of the Individual Permit (IP), the current regulatory mechanism for monitoring stormwater discharges associated with industrial activity from SWMUs and AOCs at the Laboratory. Because the IP regulates stormwater discharges from SWMUs 00-011(a,d, and e), stormwater monitoring is not necessary under the Consent Order.

Based on the above information, DOE/LANS request Certificates of Completion without Controls for SWMUs 00-011(a), 00-011(d), and 00-011(e).

If you have any questions, please contact Todd Haagenstad at (505) 665-2936 (hth@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (cheryl.rodriguez@nnsa.doe.gov).

Sincerely,



Michael J. Graham, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,



Peter Maggiore, Assistant Manager
Environmental Projects Office
Los Alamos Site Office

MG/PM/TG/DM/TH:sm

Cy: Laurie King, EPA Region 6, Dallas, TX
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Jim Davis, NMED-Resource Protection, Santa Fe, NM (date-stamped letter emailed)
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