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MEMORANDUM

TO: Neelam Dhawan, Hazardous Waste Bureau
FROM: Rusty Rodke, Solid Waste Bureau
SUBJECT: Los Alamos Landfill Closure and Related Solid Waste Management Units
DATE: January 9, 2001

By letter dated November 14, 2000, you provided public notice on the New Mexico Environment Department's intent to approve a class III modification to Resource Conservation and Recovery Act (RCRA) permit NM0890010515 for the US Department of Energy (DOE)/Los Alamos National Laboratory (LANL). On June 7, 1999, Los Alamos County submitted a Closure Plan for its landfill. The closure plan must adequately address Solid Waste Management Units (SWMU'S) identified in the RCRA permit.

I have identified the following SWMU's from the LANL permit map that was formerly in your conference room. The SWMU's associated with the landfill were proposed for "Deferred Action" in the July 1993 RCRA Facility Investigation Report (RFI) Work Plan for Operable Unit 1114. SWMU's on the south side of Sandia Canyon related to the old wastewater treatment plant (WWTP) are also of interest since the closure plan addresses the completion of a proposed roadway across the clean fill rubble pile. The 31 WWTP SWMU's were included in the February 29, 1996, RFI, which recommended "No Further Action". NMED comments and subsequent correspondence on these proposals may be available. Please provide them if possible. Please indicate the current status of each SWMU, including if it was one of the 190 proposed by DOE/LANL for "No Further Action", if it was one of the 102 that NMED previously removed from the permit or if it is one of the thirty currently proposed for removal.

1. SWMU 61-004(c) Small spot south of landfill scale house
2. SWMU 61-004(b) Small square on East Jemez Road
3. SWMU 61-005 Large disposal area of landfill, with the oldest area (since 1974) buried under about 50 feet of clean stockpiled material excavated from current landfill cell
4. SWMU 61-006 Used oil recycling center, small rectangle south of scale house
5. SWMU 61-007 Rectangle on East Jemez Road
6. SWMU 03-014(b2) Oval-shaped wastewater treatment plant (WWTP) effluent discharge area
7. SWMU 03-014(b2) Small rectangle south of above area
8. SWMU 03-014(c2) Oval area at south foot of rubble pile
9. SWMU 03-014(c2) Hook-shaped area astride the access road to the old sewage treatment plant
10. SWMU 03-014(j) Rectangle south of SWMU 03-014(c2) hook
11. SWMU 03-014(j) Small square on access road
12. SWMU 03-014(u) Small spot west of 03-014(c2) oval

If the SWMU's are under investigation or remediation or could be added to the work plans, resolving their threat to the environment would help allow the landfill



closure plan to be approved and the closure of the landfill to begin. In the alternative, a copy of the closure plan could be provided for your review, to determine that the proposed closure and post-closure care activities would satisfy your program requirements. Any modification you might propose could be included in my review comments on the Closure Plan.

cc: Ray Sisneros, Los Alamos County