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NMED
Hazardous Waste Bure

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 Nineteen Solid Waste Management Units and Two Areas of Concern in the Cañon de Valle Aggregate Area

Dear Mr. Kieling:

In accordance with Section VII.E.6.b of the Compliance Order on Consent (the Consent Order), the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) are requesting Certificates of Completion without Controls for the following sixteen solid waste management units (SWMUs) and area of concern (AOC) within the Cañon de Valle Aggregate Area:

- SWMU 16-008(a), Surface Impoundment
- SWMU 16-017(a)-99, Soil Contamination from Former High Explosives (HE) Machining Building 16-92
- SWMU 16-017(b)-99, Soil Contamination from Former HE Machining Building 16-93
- SWMU 16-017(c)-99, Soil Contamination from Former HE Machining Building 16-91
- SWMU 16-017(d)-99, Soil Contamination from Former HE Machining Building 16-90
- SWMU 16-017(e)-99, Soil Contamination from Former HE Machining Building 16-89
- SWMU 16-026(m), Outfall Associated with Former Building 16-92
- SWMU 16-026(n), Outfall Associated with Former Building 16-91
- SWMU 16-026(o), Outfall Associated with Former Building 16-90
- SWMU 16-026(p), Outfall Associated with Former Building 16-89
- SWMU 16-029(k), Sumps

- SWMU 16-029(l), Sumps
- SWMU 16-029(s), Sumps
- SWMU 16-029(t), Sumps
- SWMU 16-029(u), Sumps
- AOC C-16-067, Storage Area

SWMUs 16-008(a), 16-017(a–e)-99, 16-026(m–p), and 16-029(k, l, s–u) and AOC C-16-067 were investigated as Consolidated Unit 16-008(a)-99 during investigation of Consolidated Units 16-007(a)-99 and 16-008(a)-99. The results of this investigation were reported in the Investigation Report for Consolidated Units 16-007(a)-99 and 16-008(a)-99 at Technical Area 16, Revision 1 (LA-UR-08-0256/EP2008-0018) and the Supplemental Investigation Report for Consolidated Units 16-007(a)-99 and 16-008(a)-99 at Technical Area 16 (LA-UR-09-8193/EP2009-0643). The investigation report (IR) was approved in the New Mexico Environment Department's (NMED's) February 11, 2008, letter, Approval with Direction [for the] Investigation Report for Consolidated Units 16-007(a)-99 and 16-008(a)-99 at Technical Area 16, Revision 1 (HWB-LANL-07-038). The supplemental investigation report (SIR) was approved in NMED's February 16, 2010, letter, Notice of Approval [for the] Supplemental Investigation Report for Consolidated Units 16-007(a)-99 and 16-008(a)-99 at Technical Area 16 (HWB-LANL-10-008).

The IR and SIR confirm that the nature and extent of contamination are defined at SWMUs 16-008(a), 16-017(a–e)-99, 16-026(m–p), and 16-029(k, l, s–u) and AOC C-16-067. In addition, the IR and SIR demonstrate that these SWMUs and AOC pose no potential unacceptable risks to human health under the industrial, construction worker, and residential scenarios and pose no potential risk to ecological receptors. Therefore, neither site controls nor additional future actions are necessary at the 16 sites.

In addition, DOE and LANS are requesting Certificates of Completion with Controls for the following five SWMUs and AOC:

- SWMU 16-007(a), Settling Ponds
- SWMU 16-024(e), Soil Contamination from Former Magazine 16-33
- SWMU 16-025(e), Soil Contamination from Former HE Machining Building 16-31
- SWMU 16-025(f), Soil Contamination from Former HE Machining Building 16-32
- AOC 16-024(d), Soil Contamination from Former Magazine 16-34

SWMUs 16-007(a), 16-024(e), and 16-025(e and f) and AOC 16-024(d) were investigated as Consolidated Unit 16-007(a)-99 during the investigation of Consolidated Units 16-007(a)-99 and 16-008(a)-99, and the results were reported in the IR and SIR.

The IR and SIR confirm that the nature and extent of contamination are defined at SWMUs 16-007(a), 16-024(e), and 16-025(e and f) and AOC 16-024(d). In addition, the IR demonstrates that these SWMUs and AOC pose no potential unacceptable risks to human health under the industrial and construction worker scenarios, which are the current and reasonably foreseeable future land uses, and pose no potential risk to ecological receptors. Although potential unacceptable risk exists at these sites under the residential scenario, the sites are located on DOE property and will remain so for the foreseeable future, ensuring they will not be used for residential purposes. Because these sites pose a potential unacceptable risk under the residential scenario, but not under current and reasonably foreseeable future land uses (industrial or recreational), site control (the maintenance of the site as industrial) is required for these five sites.

The approval letter for the SIR required DOE and LANS to collect two quarters of groundwater data from monitoring well 16-26644 before they request Certificates of Completion. Monitoring well 16-26644 was installed at SWMU 16-008(a) during the supplemental investigation to monitor perched-intermediate groundwater. Groundwater samples from monitoring well 16-26644 were collected in April 2010 and July 2010, and the results were reported in the Periodic Monitoring Report for Water Canyon/Cañon de Valle Watershed, September 6–September 22, 2011 (LA-UR-12-0602/EP2012-0033). DOE and LANS have continued to collect samples from this well under the Interim Facility-wide Groundwater Monitoring Plan. The results from November 2010 to February 2014 have been reported in the periodic monitoring reports for Water Canyon/Cañon de Valle Watershed, and the results since August 2014 have been reported in the periodic monitoring reports for the Technical Area 16 260 Monitoring Group. The results for RDX (hexahydro-1,3,5-trinitro-1,3,5-triazine) from April 2010, July 2010, and September 2011 (96.5 µg/L, 16.1 µg/L, and 35.4 µg/L, respectively) exceeded the groundwater screening level (6.1 µg/L). The results for tetrachloroethene from September 2011 (5.03 µg/L) were slightly above the groundwater screening level (5 µg/L). The results since September 2011 (January 2012, July 2012, March 2013, September 2013, March 2014, and August 2014) have not exceeded screening levels.

If you have any questions, please contact Kent Rich at (505) 665-4272 (krich@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (cheryl.rodriguez@doe.em.gov).

Sincerely,

Alison M. Dorries, Division Leader
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Sincerely,

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