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33  
NEW MEXICO  
ENVIRONMENT DEPARTMENT



ENTERED



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RYAN FLYNN  
Cabinet Secretary  
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Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

April 21, 2015

Christine Gelles  
Acting Assistant Manager  
National Nuclear Security Administration  
Los Alamos Field Office  
3747 West Jemez Rd, MS A316  
Los Alamos, NM 87544

Michael T. Brandt  
Associate Director  
Environment, Safety, Health  
Los Alamos National Laboratory  
P.O. Box 1663, MS M991  
Los Alamos, NM 87545

**RE: SOLID WASTE MANAGEMENT UNIT ASSESSMENT REPORT  
REQUIREMENT FOR SEPTIC TANK/LEACHFIELD SYSTEMS AT  
TECHNICAL AREA 33  
LOS ALAMOS NATIONAL LABORATORY  
EPA ID#NM0890010515  
HWB-LANL-MISC**

Dear Ms. Gelles and Mr. Brandt:

The New Mexico Environment Department (NMED) has received the United States Department of Energy (DOE) and the Los Alamos National Security L.L.C.'s (LANS) (collectively, the Permittees) *Analytical Results from Sampling Three Septic Tank/Leachfield Systems at Los Alamos National Laboratory, DP-1589* (Report), dated December 18, 2014 and referenced by ENV-DO-14-0371/LAUR 14-29132. The Report indicates that hazardous constituents were detected in liquid samples collected from three active septic tank/leachfield systems; Technical Area (TA)-33-031, TA-33-0375, and TA-33-0161.

TA-33-031 is part of Solid Waste Management Unit (SWMU) 33-004(a), which is being investigated under the *Investigation Work Plan for Chaquehui Canyon Aggregate Area, Revision 1* (IWP), approved with modifications by NMED on March 3, 2011. Therefore, a SWMU assessment report is not required for TA-33-031.



TA-33-0375 and TA-33-0161 are not listed under any SWMUs being investigated under the IWP and are not discussed in the November 2009 *Historical Investigation Report for Chaquehui Canyon Aggregate Area*. TA-33-0161 was listed in LANL's November 1990 *Solid Waste Management Unit Report* as being part of SWMU 33-004(e), which was granted No Further Action status in 1998. Based on the subsequent 16 years of continued site usage and the sampling results provided in the Report, SWMU 33-004(e) must be reassessed.

Section III.B of the March 2005 Compliance Order on Consent (Order) states, " 'Solid Waste Management Unit' or 'SWMU' means any discernible unit at which solid waste has been placed at any time and from which the Department determines there may be a risk of a release of hazardous waste or hazardous waste constituents, irrespective of whether the unit was intended for the management of solid or hazardous waste." Based on the summary table included in the Report, hazardous constituents are present in the waste within the septic tanks near the effluent discharge to the leach fields. The disposal of hazardous constituents in the septic tanks and leach fields creates the potential for migration of hazardous constituents into the subsurface that is subject to regulation under the Order.

Section V.C of the Order states that, "[w]ithin fifteen (15) days after the discovery of any newly identified SWMU or AOC, the Respondents shall notify the Department in writing of such discovery." The Report will suffice as notification of the newly identified SWMUs or AOCs.

Section V.C of the Order also states, "[w]ithin ninety (90) days after submitting such notification, the Respondents shall submit to the Department for review and written approval a SWMU Assessment Report (SAR) for each newly identified SWMU or AOC." The Permittees must provide all information required under Section V.C, including but not limited to, the requirements under Section V.C, item 5, which states, "[i]dentification of all wastes that have been managed at or in each unit, to the extent available. Include any available data on hazardous constituents in the wastes."

In accordance with Section V.C of the Order, the Permittees must submit a SAR within 90-days of the notification, which is March 18, 2015. NMED, at its discretion, requires the SAR to be submitted no later than **June 30, 2015**. All submittals (including maps) must be in the form of two paper copies and one electronic copy in accordance with Section XI.A of the Consent Order.

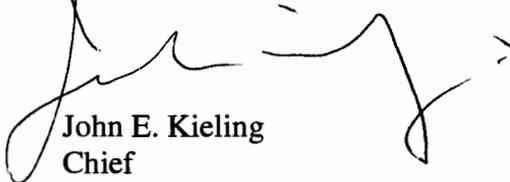
Ms. Gelles and Mr. Brandt

April 21, 2015

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Please contact Dave Cobrain at (505) 476-6055 if you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large initial "J" and "K".

John E. Kieling  
Chief

Hazardous Waste Bureau

cc: K. Roberts, NMED RPD  
D. Cobrain, NMED HWB  
N. Dhawan, NMED HWB  
B. Wear, NMED HWB  
S. Yanicak, NMED DOE OB, MS M894  
L. King, EPA 6PD-N  
R. Beers, ENV-CP, MS 992  
G. Turner, DOE-NA-00-LA, MS A316

File: Reading and LANL 2015, TA-33, Chaquehui Canyon Aggregate Area