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JUN 2010
NMED Hazardous Waste Bureau

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Los Alamos Site Office, MS A316
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Los Alamos, New Mexico 87544
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Date: JUN 15 2010
Refer To: EP2010-0284

James Bearzi, 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 Sixteen SWMUs and Nine AOCs in the Upper Los Alamos Canyon Aggregate Area

Dear Mr. Bearzi:

In accordance with Section VII.E.6.b of the Compliance Order on Consent (Consent Order), the Los Alamos National Laboratory (the Laboratory) and the Department of Energy (DOE) are requesting Certificates of Completion without controls for the following Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) within the Upper Los Alamos Canyon Aggregate Area:

- AOC 00-031(a), Area of Potentially Contaminated Soil,
- SWMU 01-001(b), Septic Tank 135,
- SWMU 01-001(c), Septic Tank 137,
- SWMU 01-001(e), Septic Tank 139,
- SWMU 01-001(t), Eastern Sanitary Waste Line,
- SWMU 01-001(u), Branch of Western Sanitary Waste Line,
- SWMU 01-002(a)-00, Industrial Waste Line,

  NOTE: SWMU 01-002(a)-00 was inadvertently referred to as SWMU 01-002 in the work plan and investigation report for the Upper Los Alamos Canyon Aggregate Area.
- SWMU 01-003(e), Surface Disposal Area,
- SWMU 01-006(d), Drainline and Outfall,
- AOC 01-006(g), Storm Drainage System,
- SWMU 01-006(o), Storm Drainage System,
- SWMU 01-007(d), Area of Suspected Subsurface Soil Radiological Contamination,
- SWMU 01-007(e), Area of Suspected Subsurface Soil Radiological Contamination,
- SWMU 01-007(j), 12 Areas of Suspected Subsurface Soil Radiological Contamination,
- AOC 01-007(k), Area of Potentially Contaminated Soil,

- SWMU 03-009(j), Surface Disposal Area,
- SWMU 32-001, Former Location of an Incinerator, and
- SWMU 41-001, Septic System.

Each of these sites was recommended for Corrective Action Complete without Controls in the report entitled *Investigation Report for Upper Los Alamos Canyon Aggregate Area, Revision 1* (LA-UR-10-0422/EP2010-0021; EP2010-0107). The report substantiates that the nature and extent of contamination is defined at each of the above listed sites and demonstrates that each site does not pose potential unacceptable risks or doses to human health under the residential scenario. In addition, the report demonstrates that each of above listed sites does not pose potential risk to ecological receptors. Therefore, neither site controls nor additional future actions under the Consent Order are necessary at the eighteen above-listed sites.

In addition, the Laboratory and DOE are requesting Certificates of Completion without controls for the following SWMU and five AOCs.

- AOC 00-031(b), Area of Potentially Contaminated Soil (remediated, no pathway),
- AOC 00-034(b), Landfill (does not exist),
- AOC C-00-042, Former Underground Tank (remediated, no pathway),
- AOC 01-003(c), Surface Disposal Area (does not exist),
- SWMU 01-007(l), Area of Potentially Contaminated Soil (no pathway),
- AOC 03-008(a), Decommissioned Firing Site (no pathway).

Each of these six sites was proposed for no further sampling in the document entitled *Investigation Work Plan for Upper Los Alamos Canyon Aggregate Area* (LA-UR-06-2464, ER2006-0226). These sites were recommended for no further sampling, because they were previously characterized and remediated, there is no pathway for human or ecological receptors, or the site was found not to exist. On these bases, the six sites were recommended for Corrective Action Complete without Controls in the *Investigation Report for Upper Los Alamos Canyon Aggregate Area, Revision 1* (LA-UR-10-0422/EP2010-0021; EP2010-0107). Neither site controls nor additional future actions under the Consent Order are necessary at the six above-listed sites.

Lastly, the Laboratory and DOE are requesting a Certificate of Completion with Controls for AOC 43-001(b2), an outfall. AOC 43-001(b2) is appropriate for Corrective Action Complete with Controls as demonstrated in the report entitled *Investigation Report for Upper Los Alamos Canyon Aggregate Area, Revision 1* (LA-UR-10-0422/EP2010-0021; EP2010-0107). The report substantiates that the nature and extent of contamination is defined at 43-001(b2) and demonstrates that the AOC does not pose potential unacceptable risks or doses to human health under the recreational scenario. However, there is potential unacceptable risk at AOC 43-001(b2) under the residential scenario. Therefore, under the Consent Order, site control (the maintenance of the site as recreational) is required for AOC 43-001(b2). The site is located on DOE property and will remain so for the foreseeable future, ensuring that it will not be used for residential purposes.

The report, including recommendations for corrective action complete for the above-listed twenty five sites, was approved with modifications in your April 21, 2010, letter *Notice of Approval Investigation Report for Upper Los Alamos Canyon Aggregate Area, Revision 1* (HWB-LANL-09-020).

If you have any questions, please contact Becky Coel-Roback at (505) 665-5011 (becky_cr@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (crodriguez2@doeal.gov).

Sincerely,

Michael J. Graham, Associate Director
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Los Alamos National Laboratory

Sincerely,

George J. Rael, Manager
Environmental Projects Office
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