

**Completion of Corrective Action  
at Sites 45-001, 45-002, and 45-004  
in ACID-SMA-2**

**March 7, 2013**

**NPDES PERMIT NO. NM0030759**

**LA-UR-13-21502**



*Completion of Corrective Action at Sites 45-001, 45-002, and 45-004*

This letter certifies completion of corrective action for Sites 45-001, 45-002, and 45-004 pursuant to Part 1, E.2(d), of Individual Permit NM0030759. This certification that corrective action is complete was prepared in accordance with 40 Code of Federal Regulations 122.22(b).

Table 1 presents the Sites achieving Resource Conservation and Recovery Act Corrective Action Complete without Controls status under the Compliance Order on Consent (the Consent Order). Analytical results obtained from baseline confirmation monitoring at ACID-SMA-2 exceeded target action levels for total polychlorinated biphenyls and gross-alpha activity, causing the Permittees to initiate corrective action. The Permittees are certifying completion of correction action at Sites 45-001, 45-002, and 45-004 through a demonstration that the Sites have achieved a certificate of completion under the Consent Order, Section VII.E.6.b. Attachment 1 contains a copy of the certificate of completion from the New Mexico Environment Department for Sites 45-001, 45-002, and 45-004, which are designated as Solid Waste Management Units 45-001, 45-002, and 45-004 for purposes of the Consent Order.

**Table 1**  
**Site(s) Demonstrating Completion of Corrective Action**

<b>Site Number</b>	<b>Associated SMA Number</b>	<b>Watershed</b>	<b>Site Priority</b>
45-001	ACID-SMA-2	Los Alamos/Pueblo	Moderate
45-002			
45-004			

*Completion of Corrective Action at Sites 45-001, 45-002, and 45-004*

# **Attachment 1**

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*Certificate of Completion for Sites 45-001, 45-002, and 45-004*





SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Hazardous Waste Bureau*

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DAVE MARTIN  
Secretary

BUTCH TONGATE  
Deputy Secretary

THOMAS SKIBITSKI  
Acting Director  
Resource Protection Division

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

February 22, 2013

Pete Maggiore  
Assistant Manager  
Environmental Projects Office  
National Nuclear Security Administration  
Los Alamos Site Office  
3747 West Jemez Road, MS A316  
Los Alamos, NM 87544

Jeffrey D. Mousseau  
Associate Director  
Environmental Programs  
Los Alamos National Security, L.L.C.  
P.O. Box 1663, MS M991  
Los Alamos, NM 87545

**RE: CERTIFICATES OF COMPLETION  
FOUR SOLID WASTE MANAGEMENT UNIT AND ONE AREA OF CONCERN  
IN THE PUEBLO CANYON AGGREGATE AREA  
EPA ID #NM0890010515  
HWB-LANL-12-063**

Dear Messrs. Maggiore and Mousseau:

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) *Request for Certificates of Completion for Four Solid Waste Management Units and One Area of Concern in the Pueblo Canyon Aggregate Area*, dated September 13, 2012 and referenced by EP2012-0202.

1. Solid Waste Management Unit (SWMU) 45-001 was a former radioactive liquid waste (RLW) treatment plant and associated outfalls. The treatment plant began operating in 1951 and operated until 1964. The plant initially received RLW only from Technical Area (TA) 1. As laboratory operations expanded, RLW from TA-3, TA-43, and TA-48 was also sent to SWMU 45-001. Decontamination and decommissioning (D&D) of

SWMU 45-001 included the demolition and removal of treatment plant equipment, structures, and waste lines and the excavation of contaminated soil. Portions of the cliff walls of Acid Canyon below the outfalls were also decontaminated.

2. SWMU 45-002 consisted of a former vehicle decontamination facility (former building 45-1) that was used to decontaminate vehicles and large equipment, including filters from the Sigma Building, trash dumpsters, and wing tanks from airplanes. SWMU 45-002 was located approximately 40 feet south of the TA-45 RLW treatment plant (SWMU 45-001). The decontamination facility began operation in 1952. Vehicles and other equipment were decontaminated by steam-cleaning. This facility operated infrequently, approximately once per month. SWMU 45-002 was decommissioned in 1966, along with the other facilities that comprised former TA-45.
3. SWMU 45-003 consisted of the former buried industrial waste line and associated manhole (structure 45-8) located within the boundaries of TA-45. This waste line was used to convey RLW to the TA-45 treatment plant, SWMU 45-001.
4. SWMU 45-004 consisted of a sanitary sewer outfall that was associated with the sanitary sewer system constructed in 1947 to serve the Los Alamos town site. This sewer system included a sanitary sewer lift station (structure 45-3) and sanitary sewer manholes (structures 45-5 and 45-6).
5. Area of Concern (AOC) C-45-001 was the site of an accidental release of plutonium-contaminated sludge that occurred in the parking lot south of building 45-2 (SWMU 45-001) in January 1957. The parking lot was removed as part of the TA-45 D&D activities.

These five sites are components of Consolidated Unit 45-001-00. The July 2008 Investigation Report for Pueblo Canyon Aggregate Area, Revision 1 (IR) presented the results of characterization and remediation activities conducted in 2006 and 2007. The vertical extent of mercury and silver were not fully determined at one sample location within SWMU 45-004. The vertical extent of metals was determined by the Permittees between February and June 2010 and the results were presented in the September 2010 Phase II IR.

Because the footprints of the five sites overlap, the Phase II IR evaluated the risk for all five sites combined. The Phase II IR demonstrated that SWMUs 45-001, 45-002, 45-003, 45-004 and AOC C-45-001 pose no potential unacceptable risks to human health under the residential land use scenario and pose no potential risk to ecological receptors. Accordingly, the sites were recommended for corrective action complete without controls in the Phase II IR. A subsequent September 2012 evaluation of potential vapor intrusion for a residential scenario concluded that vapor intrusion by contaminants did not appreciably alter the risks at any of the five sites.

NMED hereby issues Certificates of Completion without controls for SWMUs 45-001, 45-002, 45-003, 45-004 and AOC C-45-001 pursuant to section VII.E.6.b of the Consent Order.

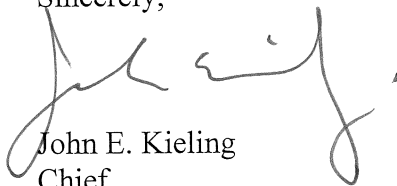


Messrs. Maggiore and Mousseau  
February 22, 2013  
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If, in the future, any additional information becomes available that indicates the sites may pose a risk to human health or the environment, NMED may require the Permittees to conduct additional corrective action at the sites.

Please contact Daniel Comeau at (505) 476-6043, if you have any questions.

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
N. Dhawan, NMED HWB  
S. Yanicak, NMED DOE OB, MS J993  
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C. Rodriguez, DOE LASO, MS A316  
T. Haagenstad, EP-CAP, MS M992

File: 2012 LANL, Certificates of Completion for SWMU 45-001, SWMU 45-002, SWMU 45-003, SWMU 45-004 and AOC C-45-001 (HWB-LANL 08-036 and HWB-LANL-12-063)

