

**Completion of Corrective Action
at Sites 35-014(e2) and 35-016(i)
in M-SMA-10.3**

October 30, 2013

NPDES PERMIT NO. NM0030759

LA-UR-13-28270

LOS ALAMOS NATIONAL LABORATORY
CERTIFICATION OF COMPLETION OF CORRECTIVE ACTION

PF: M013

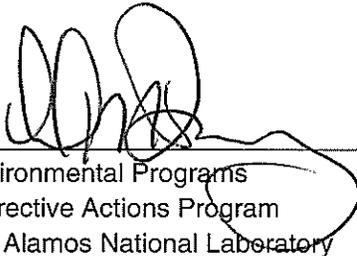
M-SMA-10.3

Site: 35-014(e2)
35-016(i)

The following certification was performed in accordance with NPDES Permit No. NM0030759, Part I.E.2, which requires the Permittees (i.e., DOE and LANS) to certify the completion of corrective action.

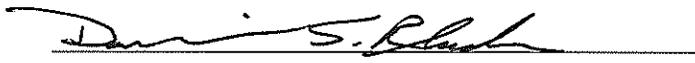
CERTIFICATION STATEMENT OF AUTHORIZATION

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."



Environmental Programs
Corrective Actions Program
Los Alamos National Laboratory

Oct 29, 2013
Date



Los Alamos Field Office
National Nuclear Security Administration

10-29-2013
Date

**LOS ALAMOS NATIONAL LABORATORY
CERTIFICATION OF COMPLETION OF CORRECTIVE ACTION**

PF: M013

M-SMA-10.3

**Site: 35-014(e2)
35-016(i)**

This certificate indicates completion of corrective action for Sites 35-014(e2) and 35-016(i) pursuant to Part 1, E.2(d), of the 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/corrective action complete with controls” status under the Compliance Order on Consent (the Consent Order). Analytical results obtained from baseline confirmation monitoring at M-SMA-10.3 exceeded target action levels for aluminum, copper, zinc and total polychlorinated biphenyls, causing the Permittees to initiate corrective action. The Permittees are certifying completion of correction action at Sites 35-014(e2) and 35-016(i) through a demonstration that the Site has achieved a certificate of completion under the Section VII.E.6.b of the Consent Order. Attachment 1 contains a copy of the certificate of completion from the New Mexico Environment Department for Sites 35-014(e2) and 35-016(i), which are designated as Area of Concern 35-014(e2) and Solid Waste Management Unit 35-016(i), respectively, for the purposes of the Consent Order.

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

Site Number	Associated SMA Number	Watershed	Site Priority
35-014(e2) 35-016(i)	M-SMA-10.3	Mortandad	High

Attachment 1

Certificate of Completion for Sites 35-014(e2) and 35-016(i)



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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RYAN FLYNN
Secretary-Designate

BUTCH TONGATE
Deputy Secretary

TOM BLAINE, P.E.
Director
Environmental Health Division

EP2013-5206

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 27, 2013

Pete Maggiore
Assistant Manager
Environmental Projects Office
National Nuclear Security Administration
Los Alamos Site Office
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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
ONE SOLID WASTE MANAGEMENT UNIT AND ONE AREA OF CONCERN
MIDDLE MORTANDAD/TEN SITE AGGREGATE AREA
EPA ID #NM0890010515
HWB-LANL-11-068**

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 Twenty-Seven Solid Waste Management Units and Ten Areas of Concern in the Middle Mortandad/Ten Site Aggregate Area* (Request), dated August 31, 2012 and referenced by EP2011-0297.

Twenty-seven solid waste management units (SWMUs) and ten areas of concern (AOCs) were recommended for corrective action complete in the *Investigation Report for the Middle Mortandad/Ten Site Aggregate Area, Revision 2* (Report), dated February 2008 (LA-UR-08-0336/EP2008-0035). NMED issued an Approval with Direction (AWD) for the Report on April 1, 2008. At a meeting held on August 26, 2013, the Permittees requested expedited review of

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AOC 35-014(e2) and SWMU 35-016(i) that were included in the Request.

To protect the surface waters from potential adverse impacts from stormwater discharges from the sites, all of these thirty-seven sites are required to be monitored under the Permittees' National Pollutant Discharge Elimination System (NPDES) individual permit. In addition, ten of these sites including AOC 35-014(e2) and SWMU 35-016(i) were identified as high priority sites in the NPDES Permit (Part 1, Section E.4.(a)). The NPDES Permit (dated November 1, 2010) requires that at these ten sites, corrective action must be completed within three years of the effective date of the permit. The sites may qualify for corrective action complete without controls after data collected from these sites demonstrates compliance with the NPDES Permit. At this time these sites do not qualify for corrective action complete without controls because data has not yet been acquired to demonstrate that surface water quality standards have been met. NMED hereby issues certificates of completion with controls for the following sites pursuant to Section VII.E.6.b of the Consent Order.

AOC 35-014(e2) is the site of a former oil spill that originated from overflows of a waste-oil impoundment. The site is located about 150 ft northeast of TA-35-85. The impoundment was decommissioned in 1989. The documented releases for the site consist of oil spills from the impoundment. Soil samples from oil-stained areas showed detectable concentrations of polychlorinated biphenyls (PCBs). The site was included in the investigation of CU 35-016(i)-00. Investigations conducted during 2004 indicate that there are no potential unacceptable risks or doses from the residual contamination for the recreational and residential land use scenarios. The results of the ecological risk-screening assessment indicate no potential unacceptable risk to ecological receptors at the site.

The Permittees must institute and maintain the control at the site of monitoring storm water discharge for potential off-site transport of residual contamination. This is currently mandated by the NPDES Permit. AOC 35-014(e2) is listed as a high priority site on the NPDES Permit.

SWMU 35-016(i) is an active surface discharge channel that handles storm water runoff from the area between the east end of TA-35-85 and the main parking lot for TA-35. The outfall is a corrugated metal pipe 18 in. in diameter. Discharge from the outfall has eroded a small channel in the mesa slope approximately three feet below the outfall and into the tuff bedrock. The site was included in the investigation of CU 35-016(i)-00. Investigations conducted during 2004 indicate that there are no potential unacceptable risks or doses from the residual contamination for the recreational and residential land use scenarios. The results of the ecological risk-screening assessment indicate no potential unacceptable risk to ecological receptors at the site.

The Permittees must institute and maintain the control at the site of monitoring storm water discharge for potential off-site transport of residual contamination. This is currently required by the NPDES Permit. SWMU 35-016(i) is listed as a high priority site on the NPDES Permit.

Messrs. Maggiore and Mousseau
September 27, 2013
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If new information becomes available that indicates that any of these sites pose a risk to human health or the environment, NMED may require the Permittees to conduct additional corrective action. Please contact Neelam Dhawan at (505) 476-6042, if you have any questions.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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File: 2013 LANL, Certificates of Completion for MM/TS AA Sites (LANL 11-068)