ERID-251268

# Completion of Corrective Action at Site 00-011(d) in B-SMA-1

November 22, 2013

NPDES PERMIT NO. NM0030759

LA-UR-13-28926

#### NPDES PERMIT NO. NM0030759

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

#### **PF: B002**

B-SMA-1

Site: 00-011(d)

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

Los Alamos Field Office National Nuclear Security Administration

2013

11-22-2013 Date

#### NPDES PERMIT NO. NM0030759

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

#### PF: B002

B-SMA-1

Site: 00-011(d)

This certificate indicates completion of corrective action for Site 00-011(d) 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).

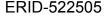
Table 1 presents the Site achieving Resource Conservation and Recovery Act "corrective action complete without controls/corrective action complete with controls" status under the Compliance Order on Consent (the Consent Order). Analytical results obtained from baseline confirmation monitoring at B-SMA-1 exceeded target action levels for gross alpha, causing the Permittees to initiate corrective action. The Permittees are certifying completion of correction action at Site 00-011(d) 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 Site 00-011(d), which is designated as Solid Waste Management Unit 00-011(d) for purposes of the Consent Order.

Table 1
Site(s) Demonstrating Completion of Corrective Action

Site Nun	nber	Associated SMA Number	Watershed	Site Priority
00-011(d	)	B-SMA-1	Los Alamos/Pueblo	Moderate

# Attachment 1

*Certificate of Completion for Site 00-011(d)* 





SUSANA MARTINEZ Governor

JOHN A. SANCHEZ Lieutenant Governor

## NEW MEXICO ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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RYAN FLYNN Cabinet Secretary-Designate

> BUTCH TONGATE Deputy Secretary

THOMAS SKIBITSKI Acting Director Resource Protection Division

EP2013-5097

#### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

May 7, 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: CERTIFICATE OF COMPLETION THREE SOLID WASTE MANAGEMENT UNITS [00-011(A), 00-011(D), 00-011(E)] IN GUAJE/BARRANCAS/RENDIJA CANYONS AGGREGATE AREA EPA ID #NM0890010515 HWB-LANL-12-039

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 Three Solid Waste Management Units in the Guaje/Barrancas/Rendija Canyons Aggregate Area*, dated June 28, 2012 and referenced by EP2012-0155. The results of the investigations were summarized in the *Investigation Report for Guaje/Barrancas/Rendija Canyons Aggregate Area at technical Area 00, Revision 1* (IR) (dated November 2007 and referenced by LA-UR-07-7820/EP2007-0720).

**SWMU 00-011(a)** is a 28.5 acre former mortar impact area that is located on United States Forest Service (USFS) land approximately 0.4 miles east of the Sportsmen's club small arms firing range (SAFR) in Rendija Canyon. The site was used as a mortar impact area in 1940s. Messrs. Maggiore and Mousseau May 7, 2013 Page 2

The site is bisected east to west by Rendija Road. On the north side of the road, the site has a gradual to steep slope to the ephemeral Rendija Canyon stream channel. The slope is covered by downed trees that burned during the Cerro Grande fire in 2000. Currently, the site is fenced and posted with DOE "No Trespassing" signs. However, site is being used for recreational purposes by the public.

**SWMU 00-011(d)** is a former bazooka firing area located largely in Los Alamos County, except for a small section on private property. The area is in a small north-trending tributary of Bayo Canyon northeast of the intersection of San Ildefonso Road and Diamond Drive. The area is comprised of approximately 5 acres and was used as a target area for 2.36-in. bazooka rounds in the mid-1940s.

**SWMU 00-011(e)** is a former ammunition impact area located on USFS land in a tributary of Rendija Canyon north-northeast of the Sportsmen's Club SAFR. The area extends north along the tributary to the top of a cliff face. The area is roughly rectangular and consists of approximately 14 acres and was used as an ammunition impact area in the mid-1940s. The site is fenced with barbwire and posted with "Explosives No Trespassing" signs.

The IR recommended that the sites be granted corrective action complete without controls because they do not pose a threat to human health and the environment under the residential land use scenario. NMED issued an Approval with Directions (AWD) for the IR on December 20, 2007. The AWD directed the Permittees to conduct biennial visual surveys at these sites and to remove any munitions and explosives of concern (MEC) or munitions debris (MD) found during the surveys. In addition, the Permittees were directed to conduct storm water monitoring at these sites and implement institutional controls such as posting warning signs.

NMED received a letter from DOE Los Alamos Field Office on February 19, 2013. The letter states that based on discussions between DOE, NMED, and Los Alamos County (LAC), the DOE requests that these sites now be considered for corrective action complete with controls status. Request was made to expedite the transfer of Rendija Canyon tracts (Tract A-14a, -14c, and -14d) to LAC. The controls proposed by DOE and approved by NMED are:

- Conduct one additional biennial survey in December 2013;
- Install a kiosk sign at the entrance to Rendija Canyon that describes the history of the site and identifies the types of potential ordnance and associated debris that may be encountered, safety precautions and contact information, if ordnance encountered;
- Install signage within the Rendija parcel to guide and communicate safety practices to visitors;
- Conduct explosive and unexploded ordnance awareness training to LAC officials.

DOE also proposed to conduct one additional biennial survey in December 2013. Given the uncertainty associated with MEC/MD surveys NMED does not concur with this proposal.

Messrs. Maggiore and Mousseau May 7, 2013 Page 3

However, the frequency may be reduced from biennial to triennial surveys after conducting the next biennial survey in 2013.

NMED approves the above-mentioned controls and hereby issues these Certificates of Completion with Controls for SWMUs 00-011(a), 00-011(d), and 00-011(e). These controls must be implemented and the documentation submitted to NMED by September 30, 2013. In addition, these sites must be monitored under the National Pollutant Discharge Elimination System individual stormwater permit. DOE indicated (July 13, 2012) that LAC intends to use the property for recreational purposes only and construction activities are not planned for the site. Land use controls must also be maintained.

If new information becomes available that indicates that the site may pose a risk to human health or the environment, NMED may require additional corrective action at these sites. Please contact Neelam Dhawan at (505) 476-6042, if you have any questions.

Sincerely,

John E. Kieling Chief Hazardous Waste Bureau

cc: T. Skibitski, NMED RPD
D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
S. Yanicak, NMED DOE OB, MS J993
L. King, EPA 6PD-N
C. Rodriguez, DOE LASO, MS A316

T. Haagenstad, EP-CAP, MS M992

File: 2012 LANL, Certificates of Completion for SWMUs 00-001(a), 00-001(d), and 00-001(e) in Guaje/Barrancas/Rendija Canyons AA Sites (LANL 12-039)