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MAR - 6 2015

NMED
Hazardous Waste Bureau

National Nuclear Security Administration
Los Alamos Field Office, MS A316
Environmental Projects Office
Los Alamos, New Mexico 87544
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Date: **MAR 06 2015**

Refer To: ENV-DO-15-0055

LAUR: N/A

Locates Action No.: N/A

John Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Request for Certificate of Completion without Controls for Solid Waste Management Unit 21-015 within Material Disposal Area B, Technical Area 21

Dear Mr. Kieling:

In accordance with Section VII.E.6.b of the Compliance Order on Consent, the U.S. Department of Energy and Los Alamos National Security, LLC, are requesting a Certificate of Completion without Controls for the following solid waste management unit (SWMU) within Material Disposal Area (MDA) B at Technical Area 21:

- SWMU 21-015, Inactive subsurface disposal site

MDA B was investigated and remediated in accordance with the October 2006 Investigation/Remediation Work Plan for Material Disposal Area B, Revision 1 (LA-UR-06-6918) (hereafter, the IRWP). The IRWP was approved by the New Mexico Environment Department (NMED) on January 31, 2007 (LANL-HWB-06-007). The June 2013 Investigation/Remediation Report for Material Disposal Area B, Solid Waste Management Unit 21-015, Revision 2 (hereafter, the IR), and the October 24, 2014, Letter Report for the Results of Analytical Sampling for Volatile Organic Compounds at Material Disposal Area B (hereafter, the VOC Report) demonstrated that the objective of meeting residential soil screening levels (SSLs) for hazardous constituents specified in the IRWP was satisfied. The original confirmation soil samples were collected from trench floors and walls before the trenches were filled with clean fill. The additional volatile organic compound confirmation samples were collected from the trench bottoms.

A point-by-point comparison of the confirmation data from the final confirmation samples with the applicable residential SSLs was conducted. Consistent with NMED's exposure characteristics for the residential exposure scenario, comparisons with residential SSLs were made using data from samples collected from the depth interval of 0 to 10 ft below ground surface (bgs). With the exception of arsenic detected in a sample collected within excavation Enclosure 3, no inorganic or organic chemical

concentrations from samples collected in the depth range of 0 to 10 ft bgs exceeded residential SSLs. The arsenic confirmation data were not, however, statistically different from background data, thereby meeting the cleanup goal for arsenic. Confirmation samples collected in 2014 (VOC Report) demonstrated that volatile organic compound concentrations from samples collected at the site are below residential SSLs. Because the cleanup objectives specified in the approved IRWP have been met, the IR (section 8.0) indicated no further investigation or remediation activities are necessary, and MDA B is appropriate for corrective action complete without controls.

The IR was approved with modifications by the NMED in its letter, "Investigation/Remediation Report for Material Disposal Area B, Solid Waste Management Unit 21-015, Revision 2, Approval with Modifications" (HWB-LANL-11-078), dated July 8, 2014. The VOC Report was approved by NMED in its letter, "Approval Letter Report for the Results of Analytical Sampling for Volatile Organic Compounds at Material Disposal Area B Technical Area 21" (HWB-LANL-14-061), dated February 3, 2015.

If you have any questions, please contact Stephani Swickley at (505) 606-1628 (sfuller@lanl.gov) or Arturo Duran at (505) 665-7772 (arturo.duran@nnsa.doe.gov).

Sincerely,



Alison M. Dorries, Division Leader
Environmental Protection Division
Los Alamos National Laboratory

Sincerely,



Peter Maggiore, Assistant Manager
Environmental Projects Office
Los Alamos Field Office

AMD/PM/DJM/SFS:sm

Cy: (date-stamped letter emailed)

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