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*Date:* SEP 28 2016  
*Symbol:* EPC-DO-16-260  
*LA-UR:* 16-27036  
*Locates Action No.:* N/A

Mr. John E. Kieling  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505

Dear Mr. Kieling:

**Subject: Response to New Mexico Environment Department Hazardous Waste Bureau  
Comments Regarding Septic Tank/Leachfield Systems at Technical Areas 33**

In the *Response to Solid Waste Management Unit Assessment Report Requirements for Septic Tank Leachfield Systems at Technical Area 33 (HWB-LANL-15-066)* letter dated May 24, 2016, the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) sent the United States Department of Energy (DOE) and the Los Alamos National Security, LLC (LANS) (collectively the Permittees) comments on and requested further investigation of the septic tanks TA-39-0104 and TA-33-0375 and the associated leachfields. The letter (HWB-LANL-15-066) required a response on or before September 30, 2016. Per NMED-HWB's request, the following is a status update and description of the activities completed in association with these septic tanks.

**TA-39-0104**

Pursuant to the Permittee's response provided to the NMED Ground Water Quality Bureau (GWQB) in *Discharge Permit Application DP-1589 Amendments, Domestic Septic Tank Disposal Systems (EPC-DO-16-115)*, dated May 16, 2016, the septic tank designated TA-39-0104 has been converted to a holding tank with the associated sand filter, TA-33-0161, being rendered inactive. In the process of converting the tank to a holding tank, the tank was hydrostatically tested for leaks using the protocol prescribed under Section IV.A.6. of Discharge Permit (DP)-1589 and reported to the NMED GWQB in *Conversion of Septic Tank TA-39-0104 to a Holding Tank, DP-1589 (EPC-DO-16-212, July 29, 2016)*. The tank was determined to

have good integrity and no leaks were detected. In the future, septage from the tank will be routinely pumped and transferred to the Los Alamos National Laboratory (LANL) Sanitary Wastewater System (SWWS) Plant under DP-857.

Septic Tank TA-39-0104 and its associated sand filter (TA-33-0161) are part of Solid Waste Management Unit (SWMU) 39-006(a). This SWMU was included in the 2009 investigation of North Ancho Canyon Aggregate Area. Because the septic tank and sand filter were active at the time of the investigation, sampling was not performed and further investigation was deferred until the system is no longer active. The SWMU investigation will be included in the Phase II investigation of North Ancho Canyon Aggregate Area, to be completed as part of the Southern External Boundary Campaign under the *LANL Compliance Order on Consent* (June 2016). The SWMU will be investigated in accordance with the schedule dictated by the Order on Consent.

**TA-33-0375**

Pursuant to the corrective actions planned for calendar year 2016 and, as proposed in *Corrective Actions Resulting from the Resampling of Septic Tank-Disposal System TA-33-0375 in June 2015, DP-1589* (EPC-DO-16-094), the septic tank was sampled, emptied, and returned to service. The contents of the tank were sampled to ensure the liquid met the Waste Acceptance Criteria (WAC) and could be pumped and disposed at the TA-46 SWWS Plant. The contents of the septic tank were removed and disposed through the SWWS Plant. After pumping, the tank and sewer line upstream of the tank were cleaned and inspected and the tank was hydrostatically tested for leaks using the protocol prescribed under Section IV.A.6. of DP-1589. Results of the inspection and hydrostatic testing revealed the tank is not leaking and has good integrity. The tank was returned to service on July 7, 2016. In accordance with the planned corrective actions, the tank will be resampled after three months (on or about October 7, 2016) to ensure hazardous constituents are no longer being discharged to the tank. Analytical results for this sampling event will be forwarded to NMED-HWB under separate cover. Sampling of the leachfield associated with septic tank TA-33-0375 will be conducted before the end of calendar year 2016 and results will be transmitted to NMED-HWB under separate cover.

If you have comments or questions regarding this response letter, please contact Karen E. Armijo, NA-LA, at (505) 665-7314 or Mark P. Haagenstad, LANS, at (505) 665-2014.

Sincerely,



John C. Bretzke  
Division Leader  
Environmental Protection and Compliance  
Division  
Los Alamos National Security, LLC

Sincerely,



Karen E. Armijo  
Permitting and Compliance Program Manager  
National Nuclear Security Administration  
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**COPY**



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