

Permit

ENTERED

To: Robert.Graves@state.nm.us, Rebecca.Kay@state.nm.us  
Subject: Resend: Fwd: RE: Meeting regarding closure plans

Robert, Rebecca,

I hope this resend works out. If not, I can FAX the text.

Gian Bacigalupa  
ENV-RCRA  
667-1579

Date: Thu, 20 Mar 2008 09:52:14 -0600  
To: "Kay, Rebecca, NMENV" <Rebecca.Kay@state.nm.us>  
From: Gian Bacigalupa <gian@lanl.gov>  
Subject: RE: Meeting regarding closure plans  
Cc: jee@lanl.gov  
Bcc: luciana@lanl.gov

Rebecca,

If your schedule isn't working out, we can probably do this by e-mail. The main reason we were asking for a meeting was to discuss format for the closure plans in terms of how they would fit into the format of the draft permit. I'm listing the main issues below.

The first big question has to do with the arrangement of the closure plans, particularly with regards to where to place the description of the actual closure activities. The draft permit states that a Closure Plan will be submitted for every permitted unit at the Facility and the closure plans will include a Sampling and Analysis plan for each permitted unit (Section 9.2.1). However, Attachment K of the draft permit reserves only for a "Closure Plan" and doesn't specify multiple plans or sections such as K.1, K.2, K.3 etc. In Attachment G, the discussions of container management at each of the units is broken up by Technical Areas. We are proposing that the closure plans also be listed by technical area (i.e., separate closure plans for TAs 3, 16, 50, 54, and 55), using that precedent in the existing draft permit.

The sampling and analysis plans for each unit at the TA will be included as sections within the closure plan rather than separate plans or attachments. This would be similar to the closure plan arrangement in the draft SNL permit. This will result in large closure plans for TA-54 and 55 but will minimize the potential for repetitive language between many separate closure plans. In the closure plans we have submitted prior to this point (Part Bs 1998, and September 2006), we used attachments to the closure plans for unit sampling activity details. As those weren't acceptable, these closure plans will limit attachments to figure drawings and unit sampling grids, again as indicated by the closure plan in the SNL draft permit. I have attached a draft table of contents as an example.

We are including options for decontamination of different types of media in the closure plans to allow approved decision conditions in the closure activities to proceed without the need for delaying permit modifications. We are putting together flowcharts to include in the plans to make these easier to understand.

Another format question we have regards how far to go in terms of references to other parts of the draft permit that contain relevant information. It appears that the draft permit does this extensively for other issues so our proposal is to utilize this option as much as possible to keep the closure plans simple.



We are also revising section numbers, internal document citations, and regulatory citations to match the draft permit.

We understand that we aren't in complete agreement regarding technical issues and that those will be deferred to the permit negotiations. However, we intend to include some of the conditions from the past closure plans (both as submitted in the permit applications and as approved in past unit closures) where we think they are important to allow flexibility in the closure activities for now. Their inclusion will affect the format and set-up of the plans to some degree. These can be revised to match agreed upon conditions after negotiations. A short list includes expanded decontamination criteria with NMED approval, some additional options for decontamination procedures, background determinations, and verification methods and clean up levels.

Please let me know if you have further questions or concerns about our proposal. We were hoping to get these closure plans done by this spring for inclusion in the draft permit but any big changes might delay that.

Thank you,  
 Gian Bacigalupa  
 ENV-RCRA, LANS  
 667-1579

- K.1 INTRODUCTION 1
- K.2 DESCRIPTION OF UNITS TO BE CLOSED 1
  - K.2.1 Estimate of Maximum Waste Treated 1
  - K.2.2 Description of Waste Managed 2
- K.3 GENERAL CLOSURE INFORMATION 2
  - K.3.1 Closure Performance Standard 2
  - K.3.2 Partial and Final Closure Activities 3
  - K.3.3 Closure Schedule 3
  - K.3.4 Amendment of the Closure Plan 3
  - K.3.5 Closure Cost Estimate, Financial Assurance, and Liability Requirements 4
- K.4 CLOSURE CERTIFICATION REPORT 4
- K.5 CLOSURE PROCEDURES 4
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  - K.5.2 Removal of Waste 5
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    - K.5.3.2 Pre-Closure and Structural Assessment 5
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- K.7 SAMPLING ACTIVITIES 10
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- K.11 WASTE MANAGEMENT 16
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- K.13 REFERENCES 17

At 04:28 PM 3/18/2008, you wrote:

Yes thanks, it was a great training down in Cruces and the weather was fabulous; minus the gusty 70 mile an hour winds. I hear it was pretty windy up this way too- I hope you sustained them ok.

So, as this discussion here has continued regarding a feasible time to meet regarding the closure plans, we have come to realize that we are not entirely clear as to what it is specifically you would like to discuss pertaining to the plans apart from the requirements in the DRAFT permit. Would you mind sending me an email explaining what specifically the objectives would be for this meeting and an agenda for the topics to be discussed? We may decide that this is something that we can work out either by phone or by reviewing a preliminary CP outline.

I look forward to hearing back from you. Thanks Gian.

-Rebecca

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