

**ATTACHMENT G**

**CLOSURE PLANS**

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**ATTACHMENT G.1**  
**TECHNICAL AREA 3, BUILDING 29**  
**INDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the indoor hazardous waste container storage unit that is comprised of Room 9010 and portions of Rooms 9020 and 9030 at Technical Area 3, Building 29 (TA-3-29) at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9, the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The entire lower floor of TA-3-29 Room 9010 has been used for the storage of hazardous waste (*see* Figure G.1-1). The room measures 106 feet (ft), 9 inches (in.), by 21 ft, 8 in. and currently contains two enclosures as described in Permit Attachment A (*Technical Area Unit Descriptions*). The room also contains two stairways and a ramped area that leads to raised rooms; the stairways, the ramp, and the raised rooms are not part of the Room 9010 portion of the permitted unit. The wall of Room 9010 that is adjacent to the raised rooms ranges in height due to connection to these rooms. Portions of Room 9010 have a 48" high wall with a 42" high hand rail.

Room 9020 measures approximately 27 feet wide by 141 feet long; the area designated for hazardous waste storage is comprised of a part of the entire room consisting of: a portion of the floor; a portion of a wall; and a portion of a chain link fence (*see* Figure G.1-2) and measures 19 feet wide by 25 feet long. Also within the Room 9020 hazardous waste storage area is a floor drain that is connected to the Technical Area 50 Radiological Liquid Waste Facility. This drain is a design feature of the facility to protect facility and programmatic equipment in the event of a water release within the basement of TA-3-29. The drain will be required for facility use after closure of the permitted unit.

Room 9030 is approximately 62 feet wide by 141 feet long; the area designated for hazardous waste storage within Room 9030 measures approximately 30 feet long by 8 feet wide and is located in the southwest corner of the room (*see* Figure G.1-3). The floor is concrete and has been painted with an epoxy sealant.

The waste stored at the permitted unit consists of hazardous waste in both liquid and solid form since 1990 and has been subject to waste management regulations under the RCRA since July 25, 1990. Due to the scope of process operations at TA-3-29, the wastes stored include corrosive liquids, sludge, debris, and chemical wastes with metals and volatile and semi-volatile organic constituents.

Specific hazardous waste constituents stored at the permitted unit are included in Tables G.1-1, G.1-2, and G.1-3. Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information about waste management procedures and hazardous waste constituents stored at the permitted unit.

### 3.0 ESTIMATE OF MAXIMUM WASTE STORED

Approximately 50 cubic meters of waste have been stored in Room 9010, approximately 70 cubic meters of waste have been stored in Room 9020, and approximately 10 cubic meters of waste have been stored in Room 9030. Throughout the life of this Permit, it is estimated that an additional 27 cubic meters of waste will be stored in Room 9010, 38 cubic meters of waste will be stored in Room 9020, and 5 cubic meters of waste will be stored in Room 9030.

### 4.0 GENERAL CLOSURE REQUIREMENTS

#### 4.1 Closure Performance Standards

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I for container storage units.

Closure of the permitted unit will be deemed complete when: 1) all surfaces and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

## 4.2 Closure Schedule

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.1-4 in this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR § 264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Decontamination verification sampling, and soil sampling if applicable, will be conducted to demonstrate that surfaces, related equipment, and media, if applicable, at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities will be completed within 180 days after the final receipt of waste. A closure certification report shall be submitted to the Department within 240 days of the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## 5.0 CLOSURE PROCEDURES

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated surfaces and equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe closure activities applicable to the permitted unit.

### 5.1 Removal of Waste

In accordance with Permit Section 9.4.2, all stored hazardous waste will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### 5.2 Records Review and Structural Assessment

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and a structural assessment will

be conducted to determine any previous finding(s) or action(s) that may influence closure activities or potential sampling locations.

### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed in accordance with Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of spills or chronic conditions identified in the Operating and Inspection Records).

### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the floor and walls of the permitted unit for any existing cracks or conditions that indicate a potential for, or an actual, release of hazardous constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

## **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with Permit Section 9.4.3, the unit's surfaces and related equipment will be decontaminated, or removed, or both and managed according to Section 7.0 of this closure plan. Decontamination activities will ensure the removal of all waste residues and hazardous waste constituents from the permitted unit to meet the closure performance standards in Section 4.1.

All surfaces and related equipment that are removed and not intended for recycle will not require decontamination, will be considered solid and potentially hazardous waste when removed, and will be disposed of in accordance with Section 7.0.

### **5.3.1 Removal of Structures and Related Equipment**

The following structures and related equipment will be removed after the structural assessment: the two room enclosures within Room 9010; and the chain-link fence that runs along the side of 9020.

### **5.3.2 Decontamination of Structures and Related Equipment**

All surfaces, structures, and related equipment that will be left in place or reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. Decontamination of the permitted unit's surfaces will include all features located within the unit (*e.g.*, walls, railings, stairways, ramps). There is no equipment located at the permitted unit that is expected to be left in place; however, if equipment is identified during the assessment that is expected to be left in place, it will be decontaminated in accordance with this section.

Decontamination of the permitted unit will be conducted by first removing loose material (*e.g.*, dust, dirt) through sweeping followed by washing using a manual wipe-down method with a solution consisting of a

surfactant detergent (*e.g.*, Alconox®) and water mixed in accordance with the manufacturer's recommendations rather than steam cleaning or pressure washing.

Migration of the wash solution (in the form of splashing, condensation, or drainage) from steam cleaning or pressure washing may potentially contaminate or otherwise negatively affect ongoing operations within the basement. Migration can potentially be mitigated using plastic barriers taped to surfaces to enclose the area. However, areas enclosed in this manner will require workers to use additional personal protective equipment (PPE). This PPE will include fully enclosed protective wear and supplied air because of the increased risk of exposure to personnel due to potential releases of radiological materials and organic compounds within the enclosure. Enclosure of the area increases the risk of personnel exhaustion, because of the additional PPE, and the potential for workers to reach radiological work exposure limits. Therefore, wipe-down washing, rather than steam cleaning or pressure washing, will be utilized because of the need to minimize the potential for exposure to workers and the migration of cleaning solution to other areas of the basement outside the permitted unit's boundary.

The entirety of the unit's floors will be decontaminated. Waste at the permitted unit is no longer stacked; however, past activities have allowed the stacking of 55-gallon drums. Including the height of pallets that may have been used, two stacked 55-gallon drums measure just over eight feet high. Therefore, to ensure that decontamination of the walls is conducted to a sufficient height, all walls in the permitted unit will be decontaminated to a height of 11 feet.

Ceilings of the permitted unit, walls above 11 feet, and the areas outside of the permitted unit will be presumed to be free of contamination unless there is some physical indication of contamination (*e.g.*, staining), the records review reveals that large amounts of liquid volatile or semi-volatile organic waste was stored in the permitted unit, or a spill or release occurred within the permitted unit that could have affected the ceiling or the walls above the height of 11 feet.

Cloths, or other absorbent cleaning devices, will not be reused to wipe down the surfaces after being wetted in the wash solution or after spraying solution onto the surfaces. Only one cloth or absorbent cleaning device will be used at a time in a single area to prevent cross-contamination. The quantity of the wash solution will be minimized by dispensing from buckets, spray bottles, or other types of small containers.

Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process. The floor drain in Room 9020 will be plugged before decontamination activities begin to ensure that none of the wash water solution enters the drain located on the floor.

#### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during closure decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.1-5 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

#### **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be



used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

## **6.1 Decontamination Verification Sampling Activities**

Decontamination verification sampling activities will be conducted at the permitted unit in order to verify that surfaces and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from the floor and from the walls (up to 11 feet) of the permitted unit. Verification wipe samples will be collected from random locations within each of the sample areas indicated on Figures G.1-1, G.1-2, and G.1-3 of this closure plan.

A total of 17 wipe samples will be collected from Room 9010; eight from the floor, four from each of the longer walls, and five from the shorter walls. A total of five wipe samples will be collected from Room 9020; two from the floor, two from the wall, and one from the floor drain. A total of four wipe samples will be collected from Room 9030; two from the floor and two from the wall.

If there is liquid found in the drain at the time of the assessment liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Liquid Sampling**

Liquid samples will be collected and analyzed to determine if residual hazardous constituents remain in the drain at the permitted unit. Liquid samples will be collected using glass or plastic tubes, a composite liquid sampler, a bacon bomb, a bailer, or by pouring liquid in sample containers.

### **6.2.2 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on the surfaces and related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limits.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification

sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.3 Solid Chip Sampling**

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit. Any non-porous inclusions from the sampling location will be removed by brushing or wiping. Using a chisel, drill, hole saw, or similar tool, a minimum 100 grams of the sample will be collected to a depth of 2 cm, or to an alternate depth specified in the assessment and transferred to an appropriate sampling container. The holding time and the preservation techniques to be used for each analysis will be determined from Table G.1-7.

### **6.2.4 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross-contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

## **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed chain-of-custody form to the Facility and it will become part of the permanent sampling record documenting the sampling efforts.

#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and

- k. name(s) of personnel responsible for the observations.

### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.1-7 presents the requirements in SW-846 (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to four (4) degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish the requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, wastes, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization unless the shipper is specifically authorized through formal documentation by the packaging and transportation organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history (*see* Tables G.1-1, G.1-2, and G.1-3). Tables G.1-1, G.1-2, and G.1-3 will be modified, as necessary, to incorporate changes as a result of the permitted unit's records review. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.1-6. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.1-6. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2. This analytical laboratory will have:

- a. a documented comprehensive QA/QC program;
- b. technical analytical expertise;
- c. a document control and records management plan;
- d. the capability to perform data reduction, validation, and reporting;

The selection of the analytical testing methods identified in Table G.1-6 is based on the following considerations:

- e. the physical form of the waste;

- f. constituents of concern;
- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

#### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods” (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contamination associated with the sampling and analysis process, and is described in the following sections, along with information on calculations necessary to evaluate the QC results.

##### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.1-8 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

##### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound and statistically valid and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries;

The laboratory will describe sample preparations that occur during the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

## **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials; these wastes are listed with potential disposal options in Table G.1-5 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.1-5, will be containerized and managed as waste.

## **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## **9.0 REFERENCES**

DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.

EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.

EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, DC.

NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.

**Table G.1-1**  
**Hazardous Waste Constituents of Concern at Room 9010<sup>a</sup>**

Category	EPA Hazardous Waste Numbers	Specific Constituents
Toxic Metals	D004, D005, D006, D007, D008, D009, D010, D011  F006	Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver  Wastewater treatment sludge
Organic Compounds	D018, D022, D027, D029, D030, D032, D033, D034, D035, D036, D037, D038, D040, D041, D042  F001, F002, F003, F004, F005	Benzene; Chloroform; 1,4-Dichlorobenzene; 1,1-Dichloroethylene; 2,4-Dinitrotoluene; Hexachlorobenzene; Hexachlorobutadiene; Hexachloroethane; Methyl ethyl ketone; Nitrobenzene; Pentrachlorophenol; Pyridine; Trichloroethylene; 2,4,5-Trichlorophenol; 2,4,6-Trichlorophenol  Trichloroethylene, Methyl ethyl ketone, Nitrobenzene, Pyridine

<sup>a</sup> Based on the permitted unit's Operating Record

**Table G.1-2**  
**Hazardous Waste Constituents of Concern at Room 9020<sup>a</sup>**

Category	EPA Hazardous Waste Numbers	Specific Constituents
Toxic Metals	D004, D005, D006, D007, D008, D009, D010, D011	Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
	F006	Wastewater treatment sludge
Organic Compounds	D018, D022, D027, D029, D030, D032, D033, D034, D035, D036, D037, D038, D040, D041, D042	Benzene; Chloroform; 1,4-Dichlorobenzene; 1,1-Dichloroethylene; 2,4-Dinitrotoluene; Hexachlorobenzene; Hexachlorobutadiene; Hexachloroethane; Methyl ethyl ketone; Nitrobenzene; Pentachlorophenol; Pyridine; Trichloroethylene; 2,4,5-Trichlorophenol; 2,4,6-Trichlorophenol
	F001, F002, F003, F004, F005	Trichloroethylene, Methyl ethyl ketone, Nitrobenzene, Pyridine

<sup>a</sup> Based on the permitted unit's Operating Record

**Table G.1-3**  
**Hazardous Waste Constituents of Concern at Room 9030<sup>a</sup>**

Category	EPA Hazardous Waste Numbers	Specific Constituents
Toxic Metals	D008	Lead

<sup>a</sup> Based on the permitted unit's Operating Record



**Table G.1-4**  
**Closure Schedule for the Technical Area 3, Building 29 Indoor Container Storage Unit**

Activity	Maximum Time Required
Notify the Department of intent to close.	-45 Days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.1-5**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.

Table G.1-5

## Potential Waste Materials, Waste Types, and Disposal Options

Potential Waste Materials	Waste Types	Disposal Options
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded concrete	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill, recycled, or reused
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Discarded waste management equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Sampling equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.

**Table G.1-5**

**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

**Table G.1-6**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
Metal Analysis				
Arsenic	7060A <sup>c</sup> , 7061A	FLAA, GFAA	10 ug/L	Determine the metal concentration in the samples.
Barium	7080A <sup>d</sup> , 7081 <sup>c</sup>	FLAA,GFAA	200 ug/L	
Cadmium	7130 <sup>d</sup> , 7131A <sup>c</sup>	FLAA, GFAA	2 ug/L	
Chromium	7190 <sup>d</sup> , 7191 <sup>c</sup>	FLAA, GFAA	10 ug/L	
Lead	7420 <sup>d</sup> , 7421 <sup>c</sup>	FLAA, GFAA	5 ug/L	
Mercury	7470A, 7471A <sup>e</sup>	CVAA	0.2 ug/L	
Selenium	7740 <sup>c</sup> , 7741A	FLAA, GFAA	5 ug/L	
Silver	7760A <sup>d</sup> , 7761 <sup>c</sup>	FLAA, GFAA	10 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.
Target compound list SVOCs plus 20 TICs	8270D <sup>c</sup>	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

<sup>c</sup> Method being integrated into Method 7010, per the May 1998 SW-846 Draft Update IVA.

<sup>d</sup> Method being integrated into Method 7000B, per the May 1998 SW-846 Draft Update IVA.

<sup>e</sup> Method being revised to 7471B per the May 1998 SW-846 Draft Update IVA.

CVAA = Cold-vapor atomic absorption spectroscopy ; GFAA = Graphite furnace atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy; ug/L = micrograms per liter

GC/MS = Gas chromatography/mass spectrometry; mg/L = milligrams per liter

**Table G.1-7**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
TCLP/Total Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
TCLP/Total Mercury	Aqueous Media:  500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon- Lined Septa	Solid Media  Cool to 4 °C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	
Semi-Volatile Organic Compounds			

Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to extraction. 40 days from extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4 °C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HCl = hydrochloric acid

mL = milliliter

HNO<sub>3</sub> = nitric acid

L = Liter

TCLP = Toxicity Characteristic Leaching Procedure

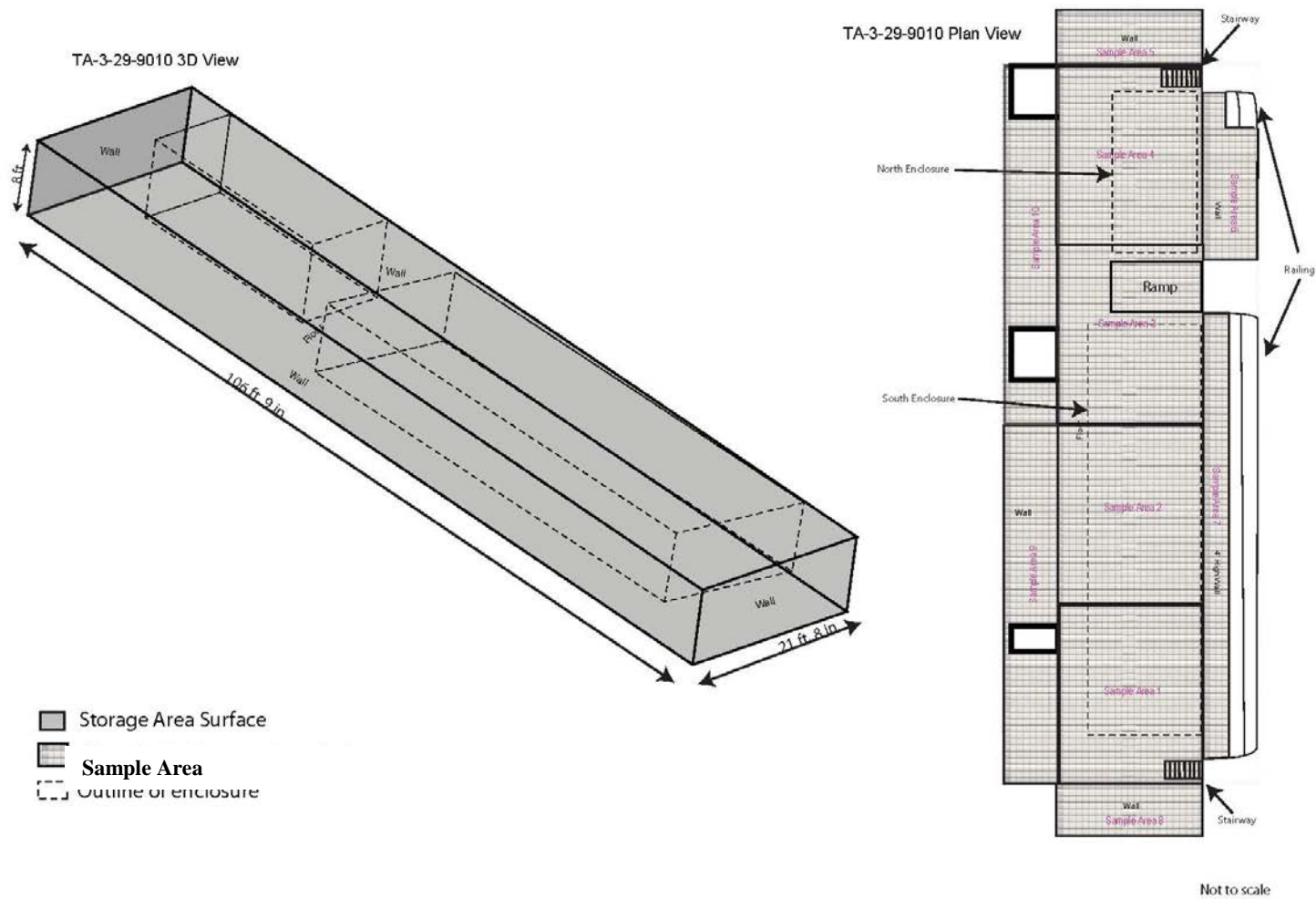
**Table G.1-8**  
**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

QC Sample Type	Applicable Analysis <sup>a</sup>	Frequency	Acceptance Criteria
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

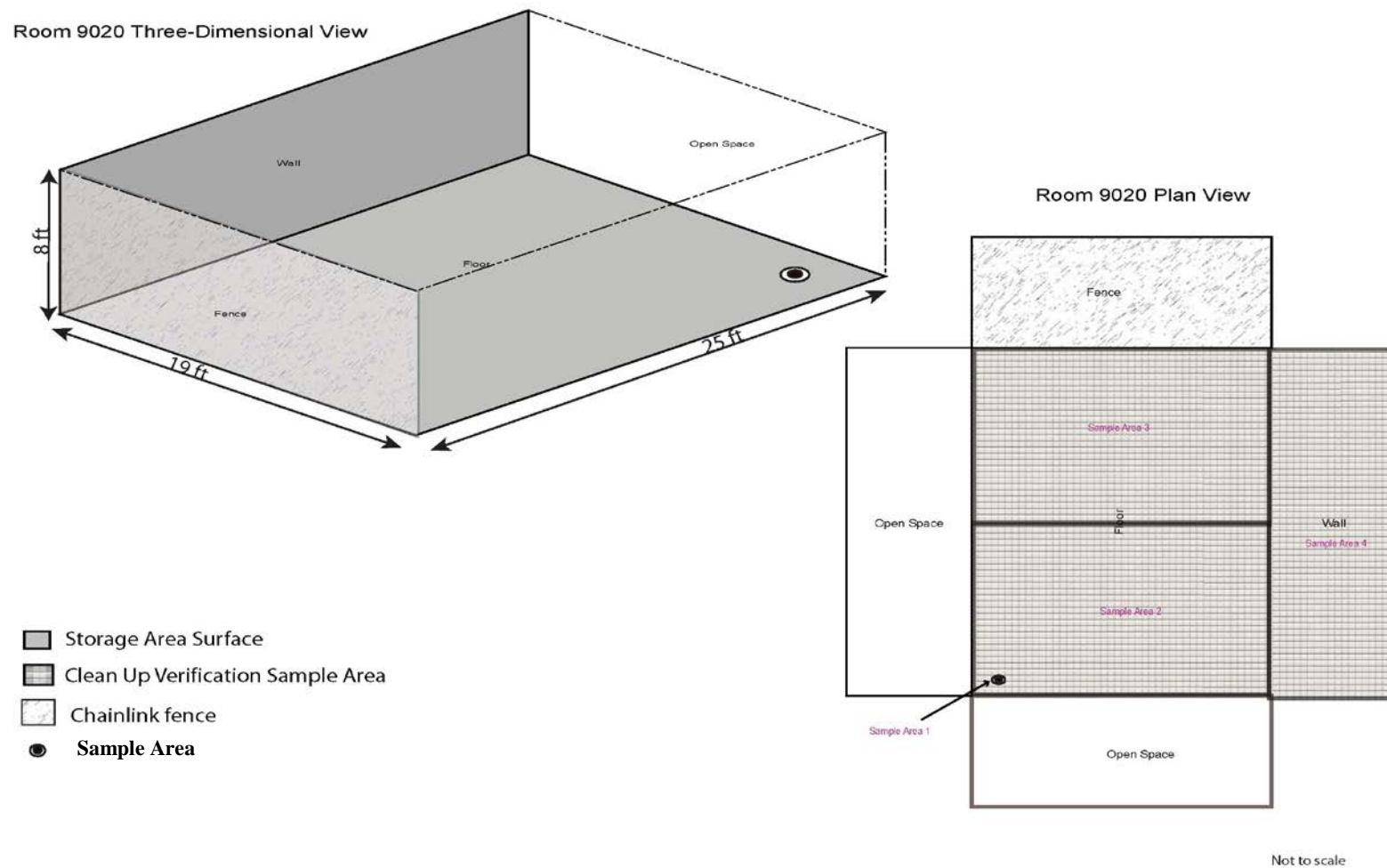
<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (*e.g.*, methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.

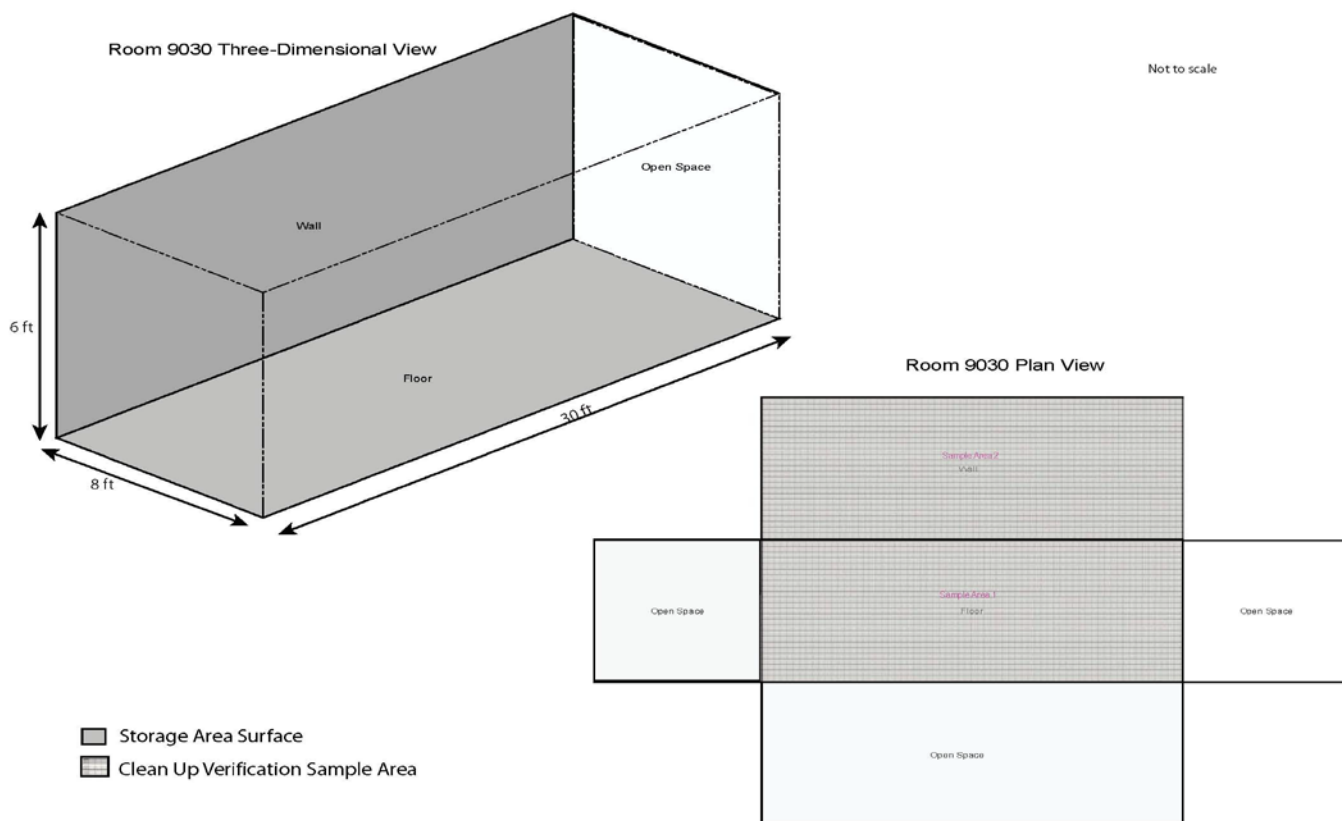




**Figure G.1-1:** Technical Area 3, Building 29, Room 9010 Grid Sampling Locations



**Figure G.1-2:** Technical Area 3, Building 29, Room 9020 Grid Sampling Locations and Additional Sampling Locations



**Figure G.1-3**  
**Technical Area 3, Building 29, Portion of Room 9030**

**Figure G.1-3: Technical Area 3, Building 29, Room 9030 Grid Sampling Locations**

**ATTACHMENT G.4**  
**TECHNICAL AREA 50, BUILDING 69**  
**INDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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G.4-1	Technical Area 50, Building 69, Room 102 Container Storage Unit Sampling Grid and Additional Sampling Locations
G.4-2	Technical Area 50, Building 69, Room 103 Container Storage Unit Sampling Grid and Additional Sampling Locations



## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the indoor hazardous waste container storage unit which is comprised of Rooms 102 and 103 at Technical Area (TA) 50, Building 69 (TA-50-69) at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9, the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not described elsewhere in the Permit are described below.

The permitted unit consists of adjacent Rooms 102 and 103. Room 102, the main process room, measures approximately 45 feet (ft) wide and 52 ft long and contains a large glovebox which occupies a substantial portion of the room; the long dimension is oriented northwest-southeast. While the entirety of Room 102 may be used for storage, the primary area utilized for hazardous waste storage is an 11- by 11-ft roped-off section. The floor is concrete with an epoxy coating and there is an operational drain located in Room 102 in the northeast area near the north wall. There is a mezzanine above Room 102 which is not part of the permitted unit.

Room 103, the unloading area, measures approximately 18 ft wide and 19 ft long and is located adjacent to, and southeast of, Room 102. A 12-ft by 20-ft roll-up loading vehicle access door is located at the southernmost end of the room and an operational drain is located in the middle of the room. Both drains in the two rooms are operational for firewater collection and will drain into holding tanks located in the building.

The waste stored at the permitted unit consists of hazardous waste in both liquid and solid form since 1995 and has been subject to waste management regulations under RCRA. Due to the scope of process operations at the permitted unit, the wastes stored include those in solid and liquid form. Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information regarding waste management procedures and hazardous waste constituents stored at the permitted unit.

### 3.0 ESTIMATE OF MAXIMUM WASTE STORED

Approximately 67,200 gallons of hazardous waste has been stored at the permitted unit over its active life. Throughout the life of this Permit, it is estimated that the maximum volume of inventory of waste for the projected lifespan of the permitted unit is 446,400 gallons.

### 4.0 GENERAL CLOSURE REQUIREMENTS

#### 4.1 Closure Performance Standards

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the clean-up levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I for container storage units.

Closure of the permitted unit will be deemed complete when: 1) all surfaces and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

#### 4.2 Closure Schedule

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.4-2 in this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR §

264.112(d)(2). However, pursuant to 40 CFR § 264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal, or within 100 days of the final receipt of hazardous waste, the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Decontamination verification sampling activities will be conducted to demonstrate that surfaces, related equipment, and media, if applicable, at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include, but not be limited to: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated structures and equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe the closure activities applicable to the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous waste will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flatbed trucks, trailers, or other appropriate vehicles for transport. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and a structural assessment will be conducted to determine any previous finding(s) or action(s) that may influence closure activities or potential sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed in accordance with Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of spills or chronic conditions identified in the Operating and Inspection Records).

### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the floor and walls of the permitted unit for any existing cracks or conditions that indicate the potential for, or an actual, release of hazardous constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (*see* Section 6.0 of this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

## **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with Permit Section 9.4.3, the unit's surfaces and related equipment will be decontaminated, or removed, or both and managed according to Section 7.0 of this closure plan. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous waste constituents from the permitted unit to meet the closure performance standards.

### **5.3.1 Removal of Structures and Related Equipment**

All surfaces and related equipment that are removed and not intended for recycle will not require decontamination, will be considered solid and potentially hazardous waste when removed, and will be disposed of in accordance with Section 7.0. Removal of Structures and Related Equipment

The following related equipment will be removed after the structural assessment: the two gloveboxes; and the one lift rack located within Room 102.

### **5.3.2 Decontamination of Structures and Related Equipment**

All surfaces and related equipment that will be reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. Decontamination of the permitted unit's equipment will include, but not be limited to, the railings, the staircases, and the ladders, excluding the mezzanine in Room 102.

Decontamination of the permitted unit and its related equipment will be conducted by first removing loose material (*e.g.*, dust, dirt) through sweeping followed by pressure washing or steam cleaning with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water mixed in accordance with the manufacturer's recommendations.

The entirety of the unit's floors will be decontaminated. Hazardous waste containers at the permitted unit are not stacked. Including the height of a pallet, a 55-gallon drum measures just over four feet high. To ensure that decontamination of the walls is conducted to a sufficient height, all walls in the permitted unit will be decontaminated to a height of seven feet.

Ceilings of the permitted unit, walls above seven feet, and the areas outside of the permitted unit will be presumed to be free of contamination unless there is some physical indication of contamination (*e.g.*, staining), the records review reveals that large amounts of liquid volatile or semi-volatile organic

hazardous waste was stored in the permitted unit, or a spill or release occurred within the permitted unit that could have affected the ceiling or the walls above seven feet.

Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process. The floor drains in Rooms 102 and 103 will be plugged before decontamination activities begin to ensure that none of the wash water solution enters the firewater drains located on the floor.

#### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during closure decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.4-6 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

### **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

#### **6.1 Decontamination Verification Sampling Activities**

Decontamination verification sampling activities will be conducted at the permitted unit in order to verify that surfaces and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one verification wipe sample from the floor and from the walls (up to seven feet) of the permitted unit. Samples will be collected from random locations within each of the sample areas indicated on Figures G.4-1 and G.4-2 of this closure plan.

A total of 13 wipe samples will be collected from Room 102; three from the floor; one from the drain; four from each of the longer walls; and five from the shorter walls. A total of seven wipe samples will be collected from Room 103; two from the floor; one from each of the walls; and one from the floor drain.

If there is liquid found in either of the drains at the time of the assessment liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Liquid Sampling**

Liquid samples will be collected and analyzed to determine if residual hazardous constituents remain in the drains at the permitted unit. Liquid samples will be collected using glass or plastic tubes, a composite liquid sampler, a bacon bomb, a bailer, or by pouring liquid in sample containers.

### **6.2.2 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on the surfaces and equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.3 Solid Chip Sampling**

Solid samples will be collected and analyzed to determine if residual hazardous constituents remain on the floor of the permitted unit. Any non-porous inclusions from the sampling location will be removed by brushing or wiping. Using a chisel, drill, hole saw, or similar tool, a minimum 100 grams of the sample will be collected to a depth of 2 cm, or to an alternate depth specified in the assessment and transferred to an appropriate sampling container. The holding time and the preservation techniques to be used for each analysis will be determined from Table G.4-3.

### **6.2.4 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

### **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

#### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

##### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed original chain-of-custody form to the Facility and it will become a part of the permanent sampling record documenting the sampling effort.

##### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling method;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

#### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.4-3 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

#### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish the requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, wastes, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation



organization unless the shipper is specifically authorized through formal documentation by the packaging and transportation organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history (*see* Table G.4-1 of this closure plan). Table G.4-1 will be amended at the time of closure, as necessary, to incorporate all changes as a result of the permitted unit's records review. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.4-4. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.4-4. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2. The analytical laboratory will have:

- a. a documented comprehensive QA/QC program;
- b. technical analytical expertise;
- c. a document control and records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.4-4 was based on the following considerations:

- e. the physical form of the waste;
- f. constituents of concern;
- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with the QA/QC procedures defined by the latest revision of "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (*SW-846*) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated via the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and the potential for sample contamination associated with the sampling and analysis process which is described in the following sections. Information on calculations necessary to evaluate the QC results is also described below.

#### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.4-5 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

#### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe sample preparations that occur during the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

### **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials; these wastes are listed with potential disposal options in Table G.4-6 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.4-6, will be containerized and managed as waste.

## 8.0 CLOSURE CERTIFICATION REPORT

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## 9.0 REFERENCES

- DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.
- EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.
- EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, DC.
- NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.

**Table G.4-1**  
**Hazardous Waste Constituents of Concern in Technical Area 50, Building 69 Indoor Container**  
**Storage Unit**

Category	EPA Hazardous Waste Numbers	Specific Constituents
Toxic Metals	D004, D005, D006, D007, D008, D009, D010, D011	Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver,
Organic Compounds	D018, D019, D021, D022, D026, D027, D028, D029, D030, D035, D036, D037, D038, D039, D040, D043  F001, F002, F003, F004, F005	Benzene, Carbon tetrachloride, Chlorobenzene, Chloroform, Cresol, 1,4-Dichlorobenzene, 1,2-Dichloroethylene, 2,4-Dinitrotoluene, Methyl ethyl ketone, Nitrobenzene, Pentachlorophenol, Pyridine, Tetrachloroethylene, Trichloroethylene, Vinyl Chloride  Acetone, Methyl ethyl ketone, , Methylene Chloride, Toluene, MIBK, DBCP, Tetrachloroethylene, 1,1,1-trichloroethane, Chlorinated Fluorocarbons, 1,1,2- Trichloro-1,1,2-Trifluoroethane, Ortho-dichlorobenzene, Trichlorofluoromethane, 1,1,2-Trichloroethane, Xylene, Ethyl acetate, Ethyl benzene, Ethyl ether, n-Butyl alcohol, Cyclohexanone, Methanol, Cresols, Cresylic acid, Nitrobenzene, Carbon disulfide, Isobutanol, Pyridine, 2-ethoxyethanol, 2-nitropropane

<sup>a</sup> Based on the permitted unit's Operating Record  
MIBK = methyl isobutyl ketone or 4-methyl-2-pentanone  
DBCP = 1,2-dibromo-3-chloropropane

**Table G.4-2**  
**Closure Schedule for the Technical Area 50, Building 69, Indoor Container Storage Unit**

Activity	Maximum Time Required
Notify the Department of intent to close.	-45 Days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.4-3**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
TCLP/Total Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
TCLP/Total Mercury	Aqueous Media:  500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon- Lined Septa	Solid Media  Cool to 4 °C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	

<i>Semi-Volatile Organic Compounds</i>			
Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to extraction. 40 days from extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4 °C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

mL = milliliter

TCLP = Toxicity Characteristic Leaching Procedure

L = Liter

HNO<sub>3</sub> = nitric acid

HCl = hydrochloric acid

**Table G.4-4**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
<b>Metal Analysis</b>				
Arsenic	7060A <sup>c</sup> , 7061A	FLAA, GFAA	10 ug/L	Determine the metal concentration in the samples.
Barium	7080A <sup>d</sup> , 7081 <sup>c</sup>	FLAA, GFAA	200 ug/L	
Cadmium	7130 <sup>d</sup> , 7131A <sup>c</sup>	FLAA, GFAA	2 ug/L	
Chromium	7190 <sup>d</sup> , 7191 <sup>c</sup>	FLAA, GFAA	10 ug/L	
Lead	7420 <sup>d</sup> , 7421 <sup>c</sup>	FLAA, GFAA	5 ug/L	
Mercury	7470A, 7471A <sup>e</sup>	CVAA	0.2 ug/L	
Selenium	7740 <sup>c</sup> , 7741A	FLAA, GFAA	5 ug/L	
Silver	7760A <sup>d</sup> , 7761 <sup>c</sup>	FLAA, GFAA	10 ug/L	
<b>Organic Analysis</b>				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.
Target compound list SVOCs plus 20 TICs	8270D <sup>c</sup>	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

<sup>c</sup> Method being integrated into Method 7010, per the May 1998 SW-846 Draft Update IVA.

<sup>d</sup> Method being integrated into Method 7000B, per the May 1998 SW-846 Draft Update IVA.

<sup>e</sup> Method being revised to 7471B per the May 1998 SW-846 Draft Update IVA.

CVAA = Cold-vapor atomic absorption spectroscopy

GFAA = Graphite furnace atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy

GC/MS = Gas chromatography/mass spectrometry

mg/L = milligrams per liter

ug/L = micrograms per liter.

**Table G.4-5**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

<b>QC Sample Type</b>	<b>Applicable Analysis<sup>a</sup></b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (e.g., methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.

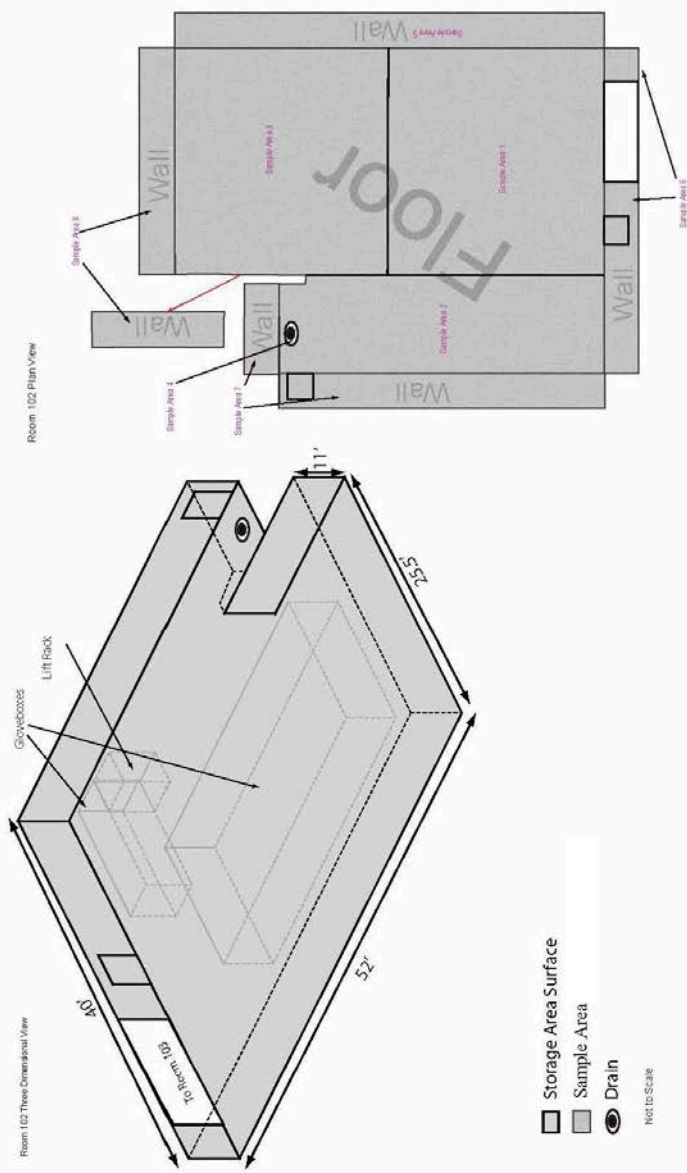


**Table G.4-6**  
**Potential Waste Materials, Waste Types, and Disposal Options**

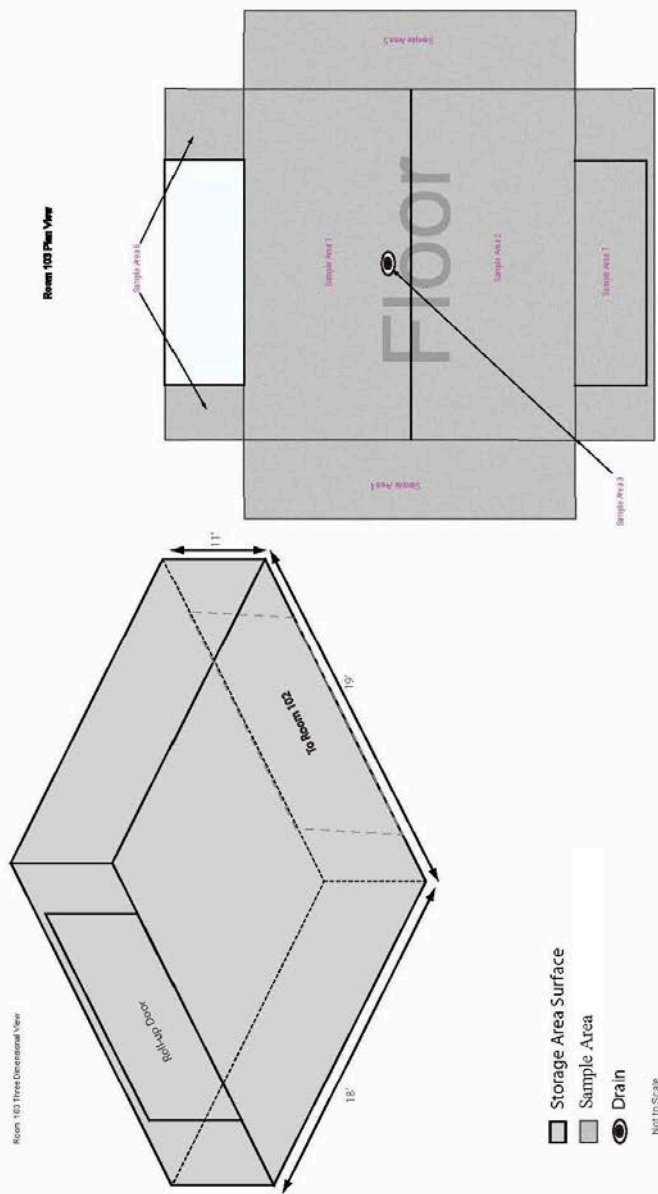
Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.

Potential Waste Materials	Waste Types	Disposal Options
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded concrete	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill, recycled, or reused
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Discarded waste management equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Sampling equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid	Subtitle D landfill

Potential Waste Materials	Waste Types	Disposal Options
	waste	
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.



**Figure G.4-1:**  
Technical Area (TA) 50, Building 69, Room 102 Container Storage Unit Sampling Grid and Additional Sampling Locations



**Figure G.4-2:**  
Technical Area (TA) 50, Building 69, Room 103 Container Storage Unit Sampling Grid and Additional Sampling Locations

**ATTACHMENT G.5**  
**TECHNICAL AREA 50, BUILDING 69**  
**OUTDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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<u>FIGURE NO.</u>	<u>TITLE</u>
G.5-1	Technical Area 50, Building 69, Outdoor Container Storage Unit Sampling Grid and Additional Sampling Locations

## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at the Technical Area 50, Building 69 (TA-50-69) Outdoor Pad at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264 Subparts G and I for hazardous waste management units at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere in the Permit are described below.

The permitted unit is located outside in the southwest corner of TA-50-69 (*see* Figure G.5-1). It consists of a four inch thick, rectangular-shaped, asphalt pad measuring 90 ft long by 24 ft wide. Hazardous waste storage has occurred on the permitted unit and in the two transportainers (75 and 194) situated on the permitted unit. Each transportainer is anchored by concrete blocks at either end of the pad and each measure eight feet (ft) wide by 40 ft long and 8.5 ft high. The unit is sloped gently (1% to 5% slope) to the south-southeast draining towards the south fence along a gravel/soil/sediment berm. The berm provides drainage for precipitation and is elevated approximately six to eight inches above-ground level in an easterly direction.

The waste stored at the permitted unit consists of hazardous and mixed waste in both solid and liquid form. The permitted unit was constructed and began managing waste in 1982; it has been subject to waste management regulations under RCRA since July 25, 1990. The wastes stored include corrosive liquids, sludge, debris, and chemical wastes with metals and volatile and semi-volatile organic constituents. Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information about hazardous waste management procedures and hazardous waste constituents stored at the permitted unit.

## 3.0 ESTIMATE OF MAXIMUM WASTE STORED

Approximately 1,999 cubic meters (528,000 gallons) of waste has been stored at the permitted unit. Throughout the life of this Permit, it is estimated that an additional 4,330 cubic meters (1,144,000 gallons) of waste will be stored.

## 4.0 GENERAL CLOSURE INFORMATION

### 4.1 Closure Performance Standards

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264, Subparts G and I.

Closure of the permitted unit will be deemed complete when: 1) all surfaces, structures, and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

### 4.2 Closure Schedule

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.5.2 in this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR §264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit structures, surfaces and related equipment.

Soil sampling and decontamination verification sampling activities will be conducted to demonstrate that soils, surfaces, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe the closure activities applicable to the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous waste will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any previous finding(s) or action(s) that may influence closure activities or additional sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed in accordance with Permit Section 9.4.6.1. The goal of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of spills or chronic conditions identified in the Operating and Inspection Records).

### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the asphalt pad for any existing cracks or conditions that indicate the potential for, or an actual, release of hazardous constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations along with the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

### **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with Permit Section 9.4.3, the unit's structures and related equipment will be decontaminated, or removed, or both and managed according Section 7.0 of this closure plan. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous constituents from the permitted unit to meet the closure performance standards.

All surfaces and related equipment that are removed and not intended for recycle will not require decontamination, will be considered solid and potentially hazardous waste when removed, and will be disposed of in accordance with Section 7.0.

#### **5.3.1 Removal of Structures and Related Equipment**

The concrete blocks that support the transportainers will be removed before the assessment and disposed of accordingly. The asphalt pad and all the materials associated with the pad (*i.e.*, asphalt berm, minimum of 6 inches of the underlying soil, base course or fill used when constructing the pad) will be removed after the assessment. If, after the removal of the pad (and underlying soil and base course material), the remaining surface shows evidence that the removal to that point has not gathered all appropriate soils and materials associated with the pad (*e.g.*, additional concrete or base course materials), additional soil and materials will be removed.

At this time there is not any other related equipment at the permitted unit that is expected to be removed or left in place; however, if equipment is identified during the review and assessment, it will be removed in accordance with Permit Section 9.4.3.2 and this closure plan section.

#### **5.3.2 Decontamination of Structures and Related Equipment**

The two transportainers at the permitted unit are to be reused and will be decontaminated by steam cleaning or pressure washing with a solution consisting of a surfactant detergent (*e.g.*, Alconox®) and water mixed in accordance with the manufacturer's recommendations. Portable berms, and other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

#### **5.3.3 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.5-3 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

## 6.0 SAMPLING AND ANALYSIS PLAN

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

### 6.1 Soil Sampling and Decontamination Verification Wipe Sampling Activities

Soil sampling and decontamination verification wipe sampling activities will be conducted at the permitted unit in order to verify that soils, structures, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment. In accordance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from the floor, the ceiling, and from each wall of the transportainers (75 and 194) situated on the permitted unit (*see* Figure G.5-1 of this closure plan) for a total of 12 wipe samples. The precise locations for these wipe samples will be randomly determined at the time of sampling within the area of each surface.

In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of soil samples at the permitted unit at the following locations:

- a. one sample on the northwest and southeast corners (*see* “biased sample location 1” and “biased sample location 2” on Figure G.5-1) of transportainer 75 and one sample on the northwest corner (*see* “biased sample location 3”) of transportainer 194 for a total of three samples (*see* Permit Section 9.4.7.1.ii(1));
- b. one sample every 900 square feet of the permitted unit for a total of four samples (*see* Permit Section 9.4.7.1.ii(2)); and
- c. one sediment sample at the storm water discharge point (*see* “additional sample of berm sediment” on Figure G.5-1).

At the time of sampling, the precise locations of the grid samples will be randomly selected within each 900 square foot sampling box (*see* Figure G.5-1). These locations will be determined by applying a sub-grid of potential sampling points and randomly choosing one. If the review or assessment determines the need to obtain additional samples within the area of the sampling box (*e.g.*, at asphalt cracks), these sample collection locations will be in addition to the grid sampling locations.

### 6.2 Sample Collection Procedures

Samples will be collected in accordance with Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Soil and Sediment Sampling**

Soils and sediment will be collected and analyzed to determine if hazardous constituents are present in soils at the permitted unit. Soil and sediment samples will be collected using a spade, scoop, auger, or trowel or other equipment as specified in approved methods for the type of analytes (*i.e.*, EPA 1996 or 2002) and from the appropriate depths as directed in Permit Section 9.4.7.1.ii. Samples will be kept at their at-depth temperature or lower, protected from ultraviolet light, sealed tightly in the recommended container, and analyzed within the specific holding times listed in Table G.5-5.

### **6.2.2 Wipe Sampling**

Surface wipe samples will be collected to determine if residual hazardous constituents remain in the transporters at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.3 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross-contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

## **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until the samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and



defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed original chain-of-custody form to the Facility and it will become part of the permanent sampling record documenting the sampling efforts.

#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line and the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;

- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.5-5 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish the requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, waste, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization, unless the shipper is specifically authorized through formal documentation by that organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all the hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history (*see* Table G.5-1 of this closure plan). Table G.5-1 may be modified, as necessary, to incorporate any changes as a result of the permitted unit's records review. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.5-4. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.5-4. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

#### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2. The analytical laboratory will have:

- a. a documented comprehensive QA/QC program;
- b. technical analytical expertise;
- c. a document control/records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.5-4 is based on the following considerations:

- e. the physical form of the waste;
- f. constituents of interest;
- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

#### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods” (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contaminations associated with the sampling and analysis process, and are described in the following sections, along with information on calculations necessary to evaluate the QC results.

##### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.5-6 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

##### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

## **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials: these wastes are listed with potential disposal options in Table G.5-3 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.5-3, will be containerized and managed as waste.

## **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## **9.0 REFERENCES**

- DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.
- EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.

EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, DC.

NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.

**Table G.5-1**  
**Hazardous Waste Constituents of Concern at the Technical Area 50, Building 69, Outdoor**  
**Container Storage Unit<sup>a</sup>**

Category	EPA Hazardous Waste Numbers	Specific Constituents
Toxic Metals	D004, D005, D006, D007, D008, D009, D010, D011	Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver,
Organic Compounds	D018, D019, D021, D022, D026, D027, D028, D029, D030, D035, D036, D037, D038, D039, D040, D043  F001, F002, F003, F004, F005	Benzene, Carbon tetrachloride, Chlorobenzene, Chloroform, Cresol, 1,4-Dichlorobenzene, 1,2-Dichloroethylene, 2,4-Dinitrotoluene, Methyl ethyl ketone, Nitrobenzene, Pentachlorophenol, Pyridine, Tetrachloroethylene, Trichloroethylene, Vinyl Chloride  Acetone, Methyl ethyl ketone, , Methylene Chloride, Toluene, MIBK, DBCP, Tetrachloroethylene, 1,1,1-trichloroethane, Chlorinated Fluorocarbons, 1,1,2- trichloro-1,1,2-trifluoroethane, ortho-dichlorobenzene, Trichlorofluoromethane, 1,1,2-trichloroethane, Xylene, Ethyl acetate, Ethyl benzene, Ethyl ether, n-butyl alcohol, Cyclohexanone, Methanol, Cresols, Cresylic acid, Nitrobenzene, Carbon disulfide, Isobutanol, Pyridine, 2-ethoxyethanol, 2-nitropropane

<sup>a</sup> Based on the unit Operating Record

MIBK = methyl isobutyl ketone or 4-methyl-2-pentanone

DBCP = 1,2-dibromo-3-chloropropane

**Table G.5-2**

**Closure Schedule for the Technical Area 50, Building 69, Outdoor Container Storage Unit**

<b>Activity</b>	<b>Maximum Time Required</b>
Notify the Department of intent to close.	-45 Days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.5-3**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.



Potential Waste Materials	Waste Types	Disposal Options
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded waste management equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Sampling equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Asphalt and concrete	Non-regulated solid waste	Subtitle D landfill or potentially, as included in corrective action activities at Area G.
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid	Either an authorized on-site radioactive waste

Potential Waste Materials	Waste Types	Disposal Options
	waste	disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.

**Table G.5-4**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method	Test Methods/ Instrumentation	Target Detection Limit <sup>a</sup>	Rationale
Metal Analysis				
Arsenic	6010, 7010, 7061A	ICP-AES, GFAA, CVAA	10 ug/L	Determine the metals concentration in the samples.
Barium	6010, 7010	ICP-AES,GFAA	200 ug/L	
Cadmium	6010, 7010	ICP-AES, GFAA	2 ug/L	
Chromium	6010, 7010	ICP-AES, GFAA	10 ug/L	
Lead	6010, 7010	ICP-AES, GFAA	5 ug/L	
Mercury	6010, 7470A, 7471B	ICP-AES, CVAA	0.2 ug/L	
Selenium	6010, 7010, 7741A	ICP-AES, GFAA, CVAA	5 ug/L	
Silver	6010, 7010	ICP-AES, GFAA	10 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.
Target compound list SVOCs plus 20 TICs	8270D, 8275	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.

<sup>a</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

CVAA = Cold-vapor atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy

GC/MS = Gas chromatography/mass spectrometry

GFAA = Graphite furnace atomic absorption spectroscopy

ICP-AES = Inductively coupled plasma-atomic emission spectrometry

mg/L = milligrams per liter

ug/L = micrograms per liter.

**Table G.5-5**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
TCLP/Total Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
TCLP/Total Mercury	Aqueous Media:  500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon- Lined Septa	Solid Media  Cool to 4 °C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	
Semi-Volatile Organic Compounds			

Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to preparative extraction. 40 days from preparative extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4 °C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HCl = hydrochloric acid

mL = milliliter

HNO<sub>3</sub> = nitric acid

L = Liter

TCLP = Toxicity Characteristic Leaching Procedure

**Table G.5-6**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

<b>QC Sample Type</b>	<b>Applicable Analysis<sup>a</sup></b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (e.g., methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.



**Figure G.5-1: Technical Area (TA) 50, Building 69, Outdoor Container Storage Unit Sample Grid and Additional Sampling Locations**

**ATTACHMENT G.6**  
**TECHNICAL AREA 54, AREA G, PAD 1**  
**OUTDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**



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<u>FIGURE NO.</u>	<u>TITLE</u>
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## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at Technical Area (TA)-54, Area G, Pad 1 at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions to the plan, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8 to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). This section of the closure plan provides a description of the permitted unit which is located in the north-eastern portion of Area G and is comprised of an asphalt pad with the structure (Building 412, the Decontamination and Volume Reduction System (DVRS)) situated on it.

The irregularly-shaped asphalt pad is approximately 358 feet (ft) long and 213 ft wide or approximately 76,000 square feet. The pad, which is sloped 1% to 1.5% to the south and south-east for drainage, consists of a four to six inch (in) layer of asphalt over the underlying base course overlying fill (minimum six inches of tuff). The pad has one structure associated with it, Building 412 (DVRS). Storage of mixed waste occurs on the Pad and in Building 412.

Dome 226, which was decommissioned in October 2009, was located on the eastern portion of the permitted unit. The dome was approximately 286 ft long and 89 ft wide, was built of an aluminum framework of trusses covered with tension-fitted ultraviolet resistant, fire-retardant coated, polyester fabric anchored with bolts to the pad's concrete ring wall and had a surface area of about 22,300 square ft. The interior floor perimeter of the dome was surrounded with a 6-inch-high, 6-inch-wide asphalt curb and was equipped with personnel doors and a roll-up door on the south end for vehicle access. A ramp was located at the vehicle entrance to the dome, which allowed vehicles and container handling equipment to pass safely over the interior curb which prevented run-on into the dome. At the southern end of the dome was a drain connecting to the recessed sump in Pad 9's Dome 229. This fire protection drain system consists of a 10 in. line running southeast from where Dome 226 was located with secondary connecting drains from Domes 232 and 231. The purpose of this drain system was to provide additional fire water collection capacity in the event of an emergency. The sump and drain have been plugged to prevent storm water from entering the system at the drainage point. Building 412 is a one story building that is approximately 220 ft long by 60 ft wide or 13,200 square ft. This building is currently used for storage and volume reduction of bulky mixed waste. It consists of two structures: an internal primary confinement structure that houses mixed waste processing operations; and an external confinement building, which contains the primary confinement structure. The building itself provides protection from the elements and a temperature-controlled space for the internal structures and associated process equipment. There are roll-up vehicle-access loading doors on the north and south ends of the building and personnel access doors on the north, east, and south for support

of operations. The floor and foundation of the building are concrete and the floor is painted with an epoxy sealant. The concrete slab is above grade to direct potential run-on away from the building. The floor in the building is sloped to a sump that has a grating cover to provide traction and a level working surface.

The primary confinement structure is housed entirely within the building and consists of interconnected enclosures. The primary confinement is approximately 150 ft long by 50 ft wide by 16 ft high and sits directly on the sealed concrete floor. The primary confinement interlocks in a self supporting steel framework that can be assembled into multiple configurations. It is equipped with both large roll-up doors so that personnel, equipment, and material can access the primary confinement and move from one enclosure to the next. Equipment in the enclosures includes gloveboxes, dismantling tools (e.g., power saws, hammers, pry bars), shearing and bailing equipment. Building 412 contains fire protection piping as well as heating and ventilation ducting.

The permitted unit has been used for the storage of both liquid and non-liquid mixed waste and has stored the following waste types: solidified inorganic solids; leached process residues; salts and cement paste; ash; dewatered aqueous sludge; chemical treatment sludge; soils; combustible debris (e.g., plastics, rubber, laboratory trash, building debris); and heterogeneous debris.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information about hazardous waste management procedures and hazardous waste constituents stored at the permitted unit.

### **3.0 ESTIMATE OF MAXIMUM WASTE STORED**

Approximately 1,458,500 gallons of hazardous waste has been stored at the permitted unit to date. Throughout the life of this Permit, it is estimated that an additional 1,760,000 gallons of hazardous waste will be stored.

## **4.0 GENERAL CLOSURE REQUIREMENTS**

### **4.1 Closure Performance Standards**

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for

non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;

- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I.

Closure of the permitted unit will be deemed complete when: 1) all surfaces, structures, and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

## 4.2 Closure Schedule

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.6.1 of this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR § 264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit structures, surfaces and related equipment.

Soil sampling and decontamination verification sampling activities will be conducted to demonstrate that soils, surfaces, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe the closure activities applicable to the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous waste will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport from the permitted unit. Appropriate shipping documentation will be prepared for the wastes during transport. All hazardous waste containers will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting decontamination and sampling activities, the Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any finding(s) or action(s) that may influence closure activities or additional sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed in accordance with Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of any spills or chronic conditions identified in the Operating and Inspection Records).

#### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the asphalt pad for any existing cracks or conditions that indicate the potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

### **5.3 Decontamination and Removal of Surfaces, Structures and Related Equipment**

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents will be removed from the permitted unit. The permitted unit's structures and related equipment will be decontaminated, removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*), Permit Section 9.4.5, and Facility waste management procedures. Decontamination



activities will ensure the removal of all hazardous waste residues and hazardous waste constituents from the permitted unit to meet the closure performance standards outlined in Permit Section 9.2.

### **5.3.1 Removal of Surfaces, Structures, and Related Equipment**

All structures and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

Building 412 (and its ancillary equipment) will be removed before the assessment. The asphalt pad, and all the materials associated with the pad (*e.g.*, concrete ringwall, sump, minimum of six inches of the base course and soil underlying the pad), will be removed after the assessment and before soil samples are collected. If, after the removal of the pad (and underlying soil and base course material), the remaining surface shows evidence that the removal to that point has not gathered all appropriate soils and materials associated with the pad (*e.g.*, additional concrete or base course materials), additional soil and materials will be removed. If it is determined to be appropriate at the time of the structural assessment, soil samples may be collected through the asphalt (before the pad and its materials have been removed) from areas where contamination is suspected (*i.e.*, locations of stains or known spills).

In the event that alternative closure requirements, in accordance Permit Section 9.2.2.2, are applied to the closure of this permitted unit, the Permittees shall take precautions to not remove or disturb the soil or tuff that overlies the regulated unit (covered under the March 1, 2005 Compliance Order on Consent (Order) (*see* Permit Section 9.3)) beneath the permitted unit.

### **5.3.2 Decontamination of Structures and Related Equipment**

All surfaces, structures, and related equipment that will be reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. This includes: the gloveboxes, enclosure components, the cabinets in Building 412; bailing equipment; portable air monitors; all electronic devices and tools; and spill cleanup equipment containers in Building 412. This list of equipment requiring decontamination may be revised during the review and assessment which would result in an amendment to this closure plan.

Water-resistant equipment and operating machinery (*i.e.*, the gloveboxes, enclosure components, and cabinets) not sensitive to water intrusion will be decontaminated by steam cleaning, or pressure washing, with a solution consisting of a surfactant detergent (*e.g.*, Alconox®) and water and mixed in accordance with the manufacturer's recommendation. All other equipment at the permitted unit that is sensitive to water intrusion (*i.e.*, the bailing equipment, portable air monitors, electronic devices or tools, and spill cleanup equipment containers) will be decontaminated by washing using a wipe-down method with a solution consisting of a surfactant detergent (*e.g.*, Alconox®) and water and mixed in accordance with the manufacturer's recommendation.

The quantity of the wash solution will be minimized by dispensing from buckets, spray bottles, or other types of containers. The sump in the DVRS building will be plugged before decontamination activities begin to ensure that none of the wash water solution enters the drain on the floor. Cloths, or other absorbent cleaning devices, will not be reused to wipe down the equipment after being wetted in the wash solution or after spraying solution onto the equipment. Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

## 5.4 Equipment Used During Decontamination Activities

Reusable protective clothing, tools, and equipment used during decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste, as summarized in Table G.6-2, in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

## 6.0 SAMPLING AND ANALYSIS PLAN

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling and analytical methods as well as the quality assurance/quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

### 6.1 Soil Sampling and Decontamination Verification Sampling Activities

Soil sampling and decontamination verification sampling activities will be conducted at the permitted unit in order to verify that soils, structures, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit.

In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of soil samples at the following locations:

- a. one sample every 900 square feet of the permitted unit for a total of 64 soil samples (*see* Permit Section 9.4.7.1.ii(2));
- b. one sample just off the southeast edge of the permitted unit where stormwater runs off the pad (*see* Permit Section 9.4.7.1.ii(3));
  1. if the soil sample collected at the southeast edge of the permitted unit detects hazardous constituents, ten samples shall be collected along the swale between the permitted unit and Pad 10 (*see* Permit Section 9.4.7.1.ii(8)) (*see* Figure G.6-2).
- c. one sample at the rock check dam at the far southeast end of Area G where stormwater discharges (*see* Permit Section 9.4.7.1.ii(3));
  1. if the soil sample collected at the rock check dam detects hazardous constituents, ten samples shall be collected along the swale between the permitted unit and Pad 10 (*see* Permit Section 9.4.7.1.ii(8)) (*see* Figure G.6-2).
- d. one sample at the floor drain at the south end of the permitted unit underlying the removed Dome 226 and one sample at the sump in Building 412 (*see* Permit Section 9.4.7.1.ii(5)); and
- e. one sample at all the joints and intersections of the ten inch fire protection drain line running southeast and then east toward Pad 9 TWISP domes (*see* Permit Section 9.4.7.1.ii(7)).

Figures G.6-1 and G.6-2 illustrate these respective sampling locations at the permitted unit.

If there is liquid found in either the drain lines or the sumps at the time of the assessment liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

At the time of sampling, the precise locations of the grid samples will be randomly selected within each 900 square foot sampling box (*see* Figure G.6-1). These locations will be determined by applying a sub-grid of potential sampling points and randomly choosing one. If the review or assessment determines the need to obtain additional samples within the area of the sampling box (*e.g.*, at asphalt cracks), these sample collection locations will be in addition to the grid sampling locations.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with the Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 1986 and EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Liquid Sampling**

Liquids will be collected and analyzed to determine if residual hazardous constituents remain in the drain lines or sumps at the permitted unit. Liquid samples will be collected using glass or plastic tubes, a composite liquid waste sampler, a bacon bomb, a bailer, or by pouring liquid into sample containers.

### **6.2.2 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on structures and equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.3 Soil Sampling**

Soil samples will be collected and analyzed to determine if hazardous constituents are present in soils at the permitted unit. Soil samples will be collected using a spade, scoop, auger, trowel, or other equipment as specified in approved methods for the type of analytes (*i.e.*, EPA 1996 or 2002) and from the appropriate depths as directed in Permit Section 9.4.7.1.ii. Samples will be kept at their at-depth temperature or lower, protected from ultraviolet light, sealed tightly in the recommended container, and analyzed within the specific holding times listed in Table G.6-4.

### **6.2.4 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned

prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

### **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with closure.

#### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

##### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until the samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed original chain-of-custody form to the Facility and it will become a part of the permanent sampling record documenting the sampling efforts.

##### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

#### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.6-4 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

#### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish these requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, waste, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization, unless the shipper is specifically authorized through formal documentation by that organization to independently tender shipments to common motor or air carriers.

## 6.4 Sample Analysis Requirements

Samples will be analyzed for all hazardous constituents listed in 40 CFR Part 261 Appendix VIII and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history. This list may be modified, as necessary, to incorporate any changes as a result of the permitted unit's records review and history of hazardous waste constituents managed at the unit. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.6-3 which presents analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### 6.4.1 Analytical Laboratory Requirements

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2 of this closure plan. The analytical laboratory will have:

- a. a documented comprehensive QA/ QC program;
- b. technical analytical expertise;
- c. a document control and records management plan; and
- d. ☐the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.6-3 is based on the following considerations:

- e. the physical form of the waste;
- f. constituents of concern;
- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

### 6.4.2 Quality Assurance/Quality Control

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of "Test Methods for Evaluating Solid Waste, Physical Chemical Methods" (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contaminations associated with the sampling and analysis process which is described in the following sections. Information on calculations necessary to evaluate the QC results is also described below.

#### 6.4.2.1 Field Quality Control

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.6-5 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the

analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

#### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

### **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials; these wastes are listed with potential disposal options in Table G.6-2 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.6-2, will be containerized and managed as waste.

### **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## 9.0 REFERENCES

- DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.
- EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.
- EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, D.C.
- LANL, 1999. "Screening Level Ecological Risk Assessment Methods," LA-UR-99-1406, Los Alamos National Laboratory, Los Alamos, New Mexico.
- NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.
- NMED, 2006. "Technical Background Document for Development of Soil Screening Levels," Rev. 4.0, June 2006, New Mexico Environment Department, Santa Fe, New Mexico.



**Table G.6-1**

**Closure Schedule for the Technical Area 54, Area G, Pad 1 Outdoor Container Storage Unit**

Activity	Maximum Time Required
Notify the Department of intent to close.	-45 days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.6-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

Potential Waste Materials	Waste Types	Disposal Options
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded waste management equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Sampling equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Dome structures	Non-regulated solid waste	Subtitle D landfill

Potential Waste Materials	Waste Types	Disposal Options
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Asphalt	Non-regulated solid waste	Subtitle D landfill or potentially, as included in corrective action activities at Area G.
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.

**Table G.6-3**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method	Test Methods/ Instrumentation	Target Detection Limit <sup>a</sup>	Rationale
Metal Analysis				
Antimony	6010, 7010	ICP-AES, GFAA	20 ug/L	Determine the metal concentration in the samples.
Arsenic	6010, 7010, 7061A	ICP-AES, GFAA, CVAA	10 ug/L	
Barium	6010, 7010	ICP-AES,GFAA	200 ug/L	
Beryllium	6010, 7010	ICP-AES, GFAA	0.2 ug/L	
Cadmium	6010, 7010	ICP-AES, GFAA	2 ug/L	
Chromium	6010, 7010	ICP-AES, GFAA	10 ug/L	
Cobalt	6010, 7010	ICP-AES, GFAA	5 ug/L	
Copper	6010, 7010	ICP-AES, GFAA	5 ug/L	
Lead	6010, 7010	ICP-AES, GFAA	5 ug/L	
Mercury	6010, 7470A, 7471B	ICP-AES, CVAA	0.2 ug/L	
Selenium	6010, 7010, 7741A	ICP-AES, GFAA, CVAA	5 ug/L	
Silver	6010, 7010	ICP-AES, GFAA	10 ug/L	
Thallium	6010, 7010	ICP-AES, GFAA	30 ug/L	
Vanadium	6010, 7010	ICP-AES, GFAA	5 ug/L	
Zinc	6010, 7010	ICP-AES, GFAA	1 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.

compounds (TIC)				
Target compound list SVOCs plus 20 TICs	8270D, 8275	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.
<b><i>Other Parameters</i></b>				
Cyanide	9010, 9012	Colorimetric	20 ug/L	Determine cyanide concentration

<sup>a</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.  
 CVAA = Cold-vapor atomic absorption spectroscopy  
 FLAA = Flame atomic absorption spectroscopy  
 GC/MS = Gas chromatography/mass spectrometry  
 GFAA = Graphite furnace atomic absorption spectroscopy  
 ICP-AES = Inductively coupled plasma-atomic emission spectrometry  
 mg/L = milligrams per liter  
 ug/L = micrograms per liter.

**Table G.6-4**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
TCLP Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide-Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4°C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
TCLP/Total Mercury	Aqueous Media:  500-mL Wide-Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon- Lined Septa	Solid Media:  Cool to 4°C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	
Semi-Volatile Organic Compounds			

Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to extraction. 40 days from extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4°C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. EPA, 1986 and all approved updates.

°C = degrees Celsius

L = Liter

HNO<sub>3</sub> = nitric acid

mL = milliliter

HCl = hydrochloric acid

TCLP = Toxicity Characteristic Leaching Procedure



**Table G.6-5**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

<b>QC Sample Type</b>	<b>Applicable Analysis <sup>a</sup></b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

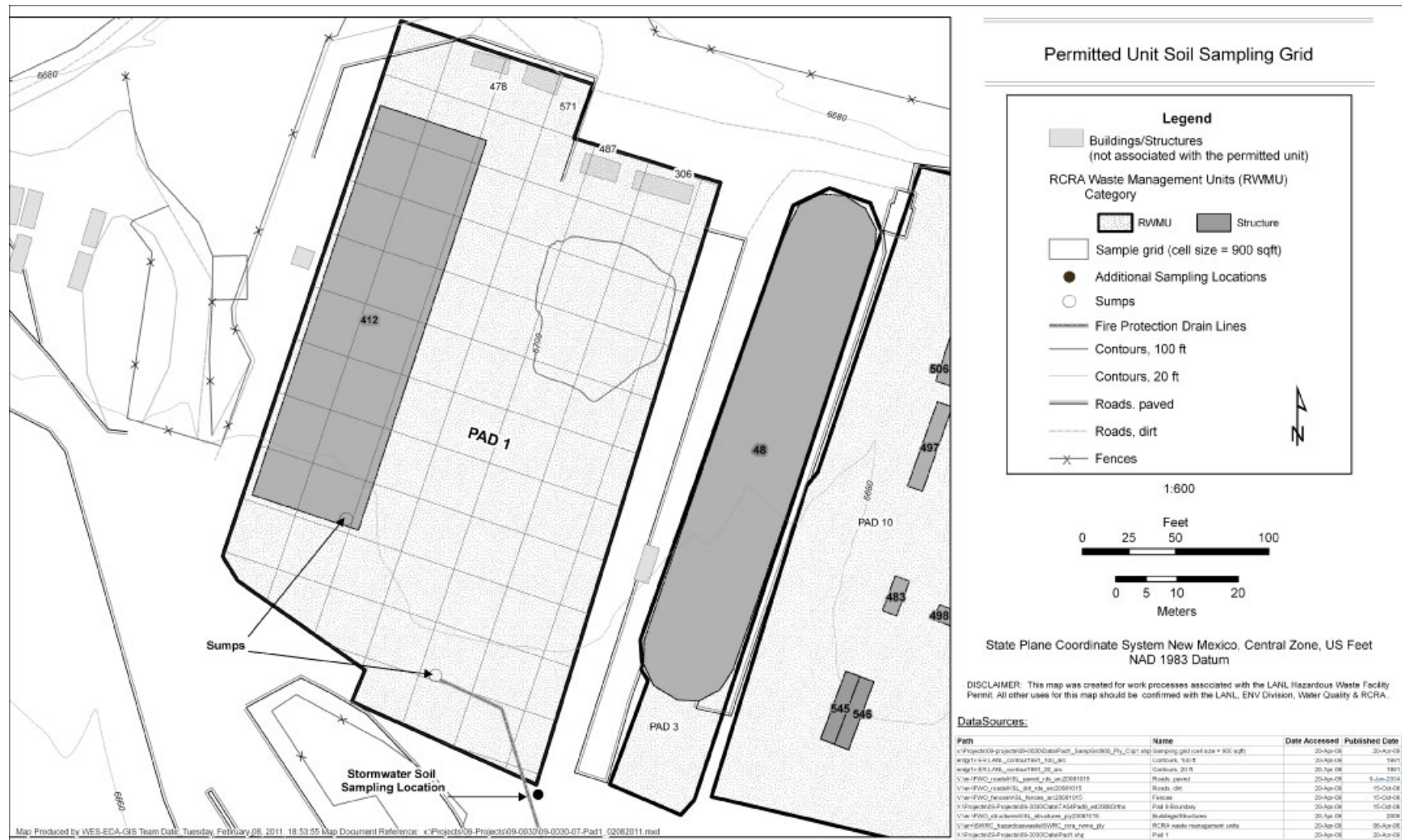
<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (*e.g.*, methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.

**Table G.6-6**

**List of Equipment at the Technical Area 54, Area G, Pad 1 Outdoor Container Storage Unit**

<b>Equipment</b>	<b>Decontamination</b>	<b>Disposal</b>
Drum venting and associated equipment	X	
Electrical infrastructure	X	X
Equipment and spill cleanup equipment containers	X	
Air pallets	X	
Container pallets	X	X
Communication equipment	X	X
Access barriers and chains	X	X
Gloveboxes	X	X
Portable air monitors	X	X
Enclosure components	X	X
Electronic devices or tools	X	
Cabinets	X	
Bailing equipment	X	



**Figure G.6-1: Technical Area 54, Area G, Pad 1 Outdoor Container Storage Unit Grid Sampling Locations**

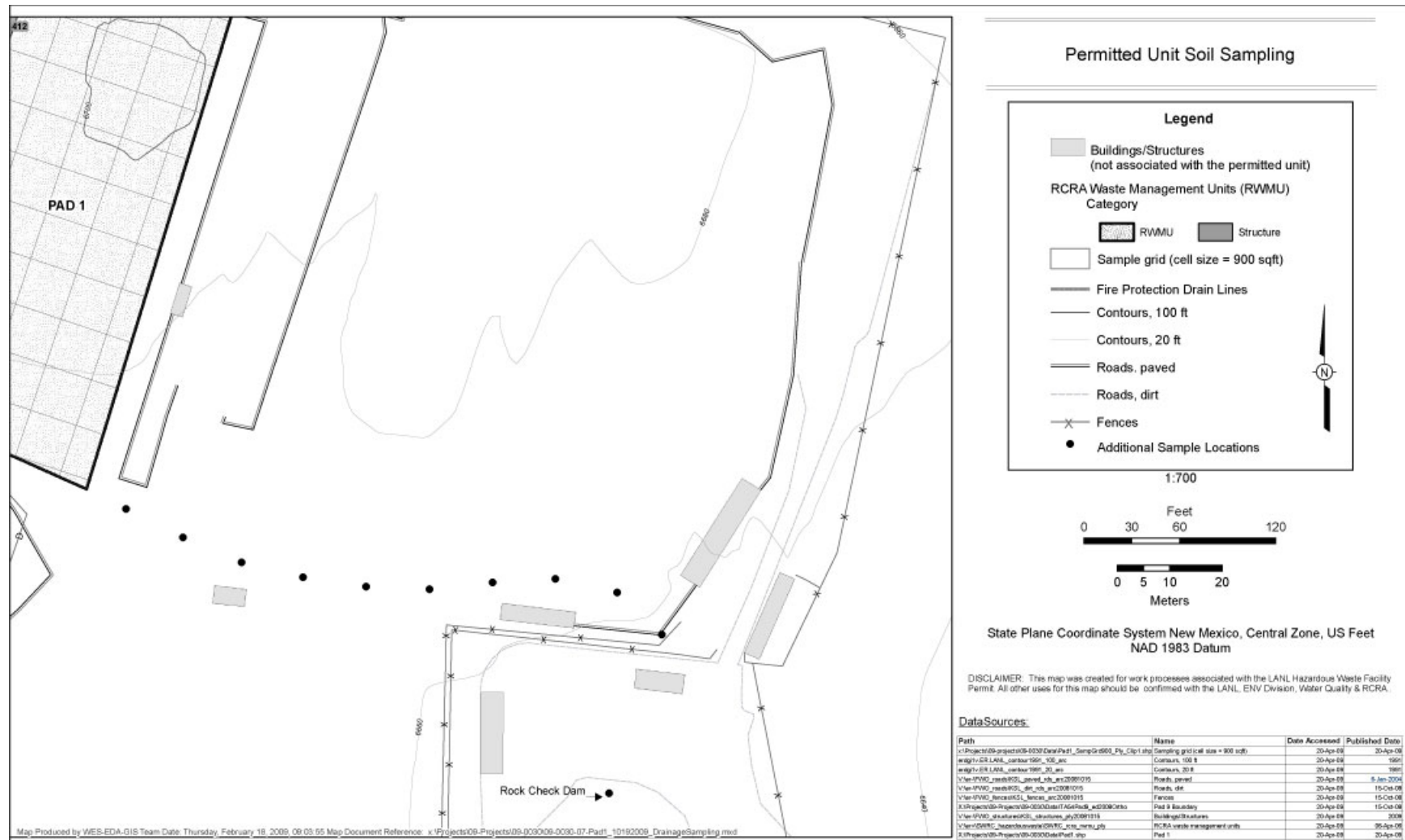


Figure G.6-2: Technical Area 54, Area G, Pad 1 Outdoor Container Storage Unit Drainage Sampling

**ATTACHMENT G.7**  
**TECHNICAL AREA 54, AREA G, PAD 3**  
**OUTDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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<u>FIGURE NO.</u>	<u>TITLE</u>
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## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at Technical Area (TA)-54, Area G, Pad 3 at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions to the plan, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8 to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The permitted unit, which is an asphalt pad that measures 339 feet long and 50 feet wide or approximately 17,000 square feet, is located in the eastern portion of Area G and was constructed in 1980. It consists of a four to six inch layer of asphalt over the underlying base course overlying fill (minimum six inches of tuff) and is sloped from 1% to 1.5% to the south for drainage. It has one structure associated with it: Dome 48 which is the only place where the storage of mixed waste occurs.

Dome 48 has been used for the storage of hazardous waste in both liquid and solid form since 1980. It is an aluminum framework of trusses covered with tension-fitted ultraviolet resistant, fire-retardant coated, polyester fabric that is anchored to the pad with standard drift pins. It is 285 feet long by 50 feet wide and covers a surface area of approximately 14,300 square feet. The dome is equipped with a double-panel rolling door at the south end and eight personnel doors, located approximately every 80 ft along the dome's length, which allow for adequate access both by vehicles and personnel. The interior perimeter of the dome is surrounded by a 6-inch-high, 8-inch-wide asphalt curb which helps prevent run-on into and runoff from the dome. An asphalt ramp located at the vehicle entrance allows vehicles and container handling equipment to pass safely over the curb.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*), include information regarding waste management procedures and hazardous waste constituents stored at the permitted unit.

## 3.0 ESTIMATE OF MAXIMUM WASTE STORED

Approximately 1,026,500 gallons of hazardous waste has been stored at the permitted unit to date. Throughout the life of this Permit, it is estimated that an additional 1,283,000 gallons of hazardous waste will be stored.

## 4.0 GENERAL CLOSURE REQUIREMENTS

### 4.1 Closure Performance Standards

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I.

Closure of the permitted unit will be deemed complete when: 1) all structures, surfaces, and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

### 4.2 Closure Schedule

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides a schedule of closure activities (*see also* Table G.7-1 in this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR § 264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, the Permittees will complete the records review (review) and assessment and submit an amended closure plan if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Soil sampling and decontamination verification sampling will be conducted to demonstrate that soils and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe the procedures to be used for closure of the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous waste will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport from the permitted unit. Appropriate shipping documentation will be prepared for the wastes during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any finding(s) or action(s) that may influence closure activities or additional sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed in accordance with Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of any spills or chronic conditions identified in the Operating and Inspection Records).

### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the asphalt pad for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the SAP (*see* Section 6.0 of this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

## **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents will be removed from the permitted unit. The permitted unit's related equipment will be decontaminated, removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*), Permit Section 9.4.5, and Facility waste management procedures. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous constituents from the permitted unit to meet the closure performance standards outlined in Permit Section 9.2.

### **5.3.1 Removal of Structures and Related Equipment**

All structures and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

Dome 48 (and its ancillary equipment) will be removed before the structural assessment. The asphalt pad, and all the materials associated with the pad (*e.g.*, curbing ramps, minimum of six inches of the base course and soil underlying the pad), will be removed after the structural assessment. If, after the removal of the pad (and underlying soil and base course material), the remaining surface shows evidence that the removal to that point has not gathered all appropriate soils and materials associated with the pad (*e.g.*, additional concrete or base course materials), additional soil and materials will be removed. If it is determined to be appropriate at the time of the assessment, soil samples may be collected through the asphalt (before the pad and its materials have been removed) from areas where contamination is suspected (*i.e.*, locations of stains or known spills).

In the event that alternative closure requirements, in accordance Permit Section 9.2.2.2, are applied to the closure of this permitted unit, the Permittees shall take precautions to not remove or disturb the soil or tuff that overlies the regulated unit (covered under the March 1, 2005 Compliance Order on Consent (Order) (*see* Permit Section 9.3)) beneath the permitted unit.

### **5.3.2 Decontamination of Equipment**

All related equipment that will be reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. This includes: the equipment cabinets; bailing equipment; portable air monitors; all electronic devices and tools; and spill cleanup equipment containers from within Dome 48. This list of equipment requiring decontamination may be revised during the review and assessment which would result in an amendment to this closure plan.

Water resistant equipment and operating machinery (*e.g.*, the cabinets) and not sensitive to water intrusion at the permitted unit will be decontaminated by steam cleaning or pressure washing with a

solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water and mixed in accordance with the manufacturer's recommendations. All other equipment at the permitted unit that is sensitive to water intrusion (*i.e.*, the bailing equipment, portable air monitors, electronic devices or tools, and spill cleanup equipment containers) will be decontaminated by washing using a wipe-down method with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water and mixed in accordance with the manufacturer's recommendations.

The quantity of the wash solution will be minimized by dispensing from buckets, spray bottles, or other types of containers. Cloths, or other absorbent cleaning devices, will not be reused to wipe down the equipment after being wetted in the wash solution or after spraying solution onto the equipment.

Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

#### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.7-2 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

### **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, quality assurance and quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

#### **6.1 Soil Sampling and Decontamination Verification Wipe Sampling Activities**

Soil sampling and decontamination verification wipe sampling activities will be conducted at the permitted unit in order to verify that the soils at the permitted unit and that equipment related to the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment related to the permitted unit.

In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of soil samples at the following locations:

- a. one soil sample every 900 square feet of the permitted unit for a total of 22 soil samples (*see* Permit Section 9.4.7.1.ii(2));
- b. one sample just off the southeast edge of the permitted unit where stormwater runs off the pad (*see* Permit Section 9.4.7.1.ii(3));

1. if the soil sample collected at the southeast edge of the permitted unit detects hazardous constituents, then nine samples shall be collected along the swale between the permitted unit and Pad 10 (*see* Permit Section 9.4.7.1.ii(8)) (*see* Figure G.7-2); and
- c. one sample at the rock check dam at the far southeast end of Area G where stormwater discharges (*see* Permit Section 9.4.7.1.ii(3));
1. if the soil sample collected at the rock check dam detects hazardous constituents, then nine samples shall be collected along the swale between the permitted unit and Pad 10 (*see* Permit Section 9.4.7.1.ii(8)) (*see* Figure G.7-2).

Figures G.7-1 and G.7-2 illustrate these respective sampling locations.

At the time of sampling, the precise locations of the grid sample will be randomly selected within each 900 square foot sampling box (*see* Figure G.7-1). These locations will be determined by applying a sub-grid of potential sampling points and randomly choosing one. If the review or assessment determines the need to obtain additional samples collected within the area of the sampling box (*e.g.*, at asphalt cracks), these sample collection locations will be in addition to the grid sample locations.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 1986 and EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on the equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.2 Soil Sampling**

Soil samples will be collected and analyzed to determine if hazardous constituents are present in soils at the permitted unit. Soil samples will be collected using a spade, scoop, auger, trowel, or other equipment as specified in approved methods for the type of analytes (*i.e.*, EPA 1996 or 2002) and from the appropriate depths as directed in Permit Section 9.4.7.1.ii. Samples will be kept at their at-depth temperature or lower, protected from ultraviolet light, sealed tightly in the recommended container, and analyzed within the specific holding times listed in Table G.7-4.

### **6.2.3 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

## **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until the samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed original chain-of-custody form to the Facility and it will become a part of the permanent sampling record documenting the sampling effort.

#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;



- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

#### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.7-3 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

#### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility

documents establish these requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, waste, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization, unless the shipper is specifically authorized through formal documentation by that organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history. This list may be modified, as necessary, to incorporate any changes as a result of the permitted unit's records review and history of hazardous waste constituents managed at the unit. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.7-3. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.7-3. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2. The analytical laboratory will have:

- a. a documented comprehensive QA/ QC program;
- b. technical analytical expertise;
- c. a document control and records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.7-5 was based on the following considerations:

- e. the physical form of the waste;
- f. constituents of concern;
- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC

samples evaluate precision, accuracy, and potential sample contaminations associated with the sampling and analysis process which are described in the following sections. Information on calculations necessary to evaluate the QC results is also described below.

#### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.7-5 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

#### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. the physical form of the waste;
- c. results from QC samples such as blanks, spikes, and calibrations;
- d. reference to standard methods or a detailed description of analytical procedures; and
- e. raw data printouts for comparison with summaries.

The laboratory will describe the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

### **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials; these wastes are listed with potential disposal options in Table G.7-2 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water

solution. Disposable equipment and other small equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.7-2.

## **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department in accordance with Permit Section 9.5.

## **9.0 REFERENCES**

- DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.
- EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.
- EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, D.C.
- LANL, 1999. "Screening Level Ecological Risk Assessment Methods," LA-UR-99-1406, Los Alamos National Laboratory, Los Alamos, New Mexico.
- NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.
- NMED, 2006. "Technical Background Document for Development of Soil Screening Levels," Rev. 4.0, June 2006, New Mexico Environment Department, Santa Fe, New Mexico.

**Table G.7-1**

**Closure Schedule for the Technical Area 54, Area G, Pad 3 Outdoor Container Storage Unit**

Activity	Maximum Time Required
Notify the Department of intent to close.	-45 days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.7-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

Potential Waste Materials	Waste Types	Disposal Options
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded waste management equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Sampling equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Dome structures	Non-regulated solid waste	Subtitle D landfill

Potential Waste Materials	Waste Types	Disposal Options
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Asphalt	Non-regulated solid waste	Subtitle D landfill or potentially, as included in corrective action activities at Area G.
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.



**Table G.7-3**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method	Test Methods/ Instrumentation	Target Detection Limit <sup>a</sup>	Rationale
Metal Analysis				
Antimony	6010, 7010	ICP-AES, GFAA	20 ug/L	Determine the metal concentration in the samples.
Arsenic	6010, 7010, 7061A	ICP-AES, GFAA, CVAA	10 ug/L	
Barium	6010, 7010	ICP-AES,GFAA	200 ug/L	
Beryllium	6010, 7010	ICP-AES, GFAA	0.2 ug/L	
Cadmium	6010, 7010	ICP-AES, GFAA	2 ug/L	
Chromium	6010, 7010	ICP-AES, GFAA	10 ug/L	
Cobalt	6010, 7010	ICP-AES, GFAA	5 ug/L	
Copper	6010, 7010	ICP-AES, GFAA	5 ug/L	
Lead	6010, 7010	ICP-AES, GFAA	5 ug/L	
Mercury	6010, 7470A, 7471B	ICP-AES, CVAA	0.2 ug/L	
Selenium	6010, 7010, 7741A	ICP-AES, GFAA, CVAA	5 ug/L	
Silver	6010, 7010	ICP-AES, GFAA	10 ug/L	
Thallium	6010, 7010	ICP-AES, GFAA	30 ug/L	
Vanadium	6010, 7010	ICP-AES, GFAA	5 ug/L	
Zinc	6010, 7010	ICP-AES, GFAA	1 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.

Target compound list SVOCs plus 20 TICs	8270D, 8275	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.
<i>Other Parameters</i>				
Cyanide	9010, 9012	Colorimetric	20 ug/L	Determine cyanide concentration

<sup>a</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type; CVAA = Cold-vapor atomic absorption spectroscopy; FLAA = Flame atomic absorption spectroscopy; GC/MS = Gas chromatography/mass spectrometry; GFAA = Graphite furnace atomic absorption spectroscopy; ICP-AES = Inductively coupled plasma-atomic emission spectrometry; mg/L = milligrams per liter; ug/L = micrograms per liter;

**Table G.7-4**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
<b><i>Metals</i></b>			
Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:	Aqueous Media:	180 Days
	500-mL Wide-Mouth-Polyethylene or Glass with Teflon Liner	HNO <sub>3</sub> to pH <2 Cool to 4°C	
	Solid Media:	Solid Media:	
	125-mL Glass	Cool to 4°C	
Total Mercury	Aqueous Media:	Aqueous Media:	28 Days
	500-mL Wide-Mouth-Polyethylene or Glass with Teflon Liner	HNO <sub>3</sub> to pH <2 Cool to 4 °C	
	Solid Media:	Solid Media:	
	125-mL Glass	Cool to 4°C	
<b><i>Volatile Organic Compounds</i></b>			
Target Compound Volatile Organic Compounds	Aqueous Media:	Aqueous Media:	14 days
	Two 40-mL Amber Glass Vials with Teflon-Lined Septa	HCl to pH<2 Cool to 4 °C	
	Solid Media:	Solid Media:	
	125-mL Glass or Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Cool to 4°C Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	
<b><i>Semi-Volatile Organic Compounds</i></b>			
Target Compound Semi-	Aqueous Media:	Aqueous Media:	Seven days from field

volatile Organic Compounds	Four 1-L Amber Glass with Teflon-Lined Lid	Cool to 4 °C	collection to extraction. 40 days from extraction to determinative analysis.
	Solid Media:	Solid Media:	
	250-mL Glass	Cool to 4°C	

- <sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.
- <sup>b</sup> Information obtained from “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods,” SW-846, USEPA, 1986 and all approved updates; °C = degrees Celsius; L = Liter; HNO<sub>3</sub> = nitric acid; mL = milliliter; HCl = hydrochloric acid; TCLP = Toxicity Characteristic Leaching Procedure

**Table G.7-5**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

<b>QC Sample Type</b>	<b>Applicable Analysis <sup>a</sup></b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

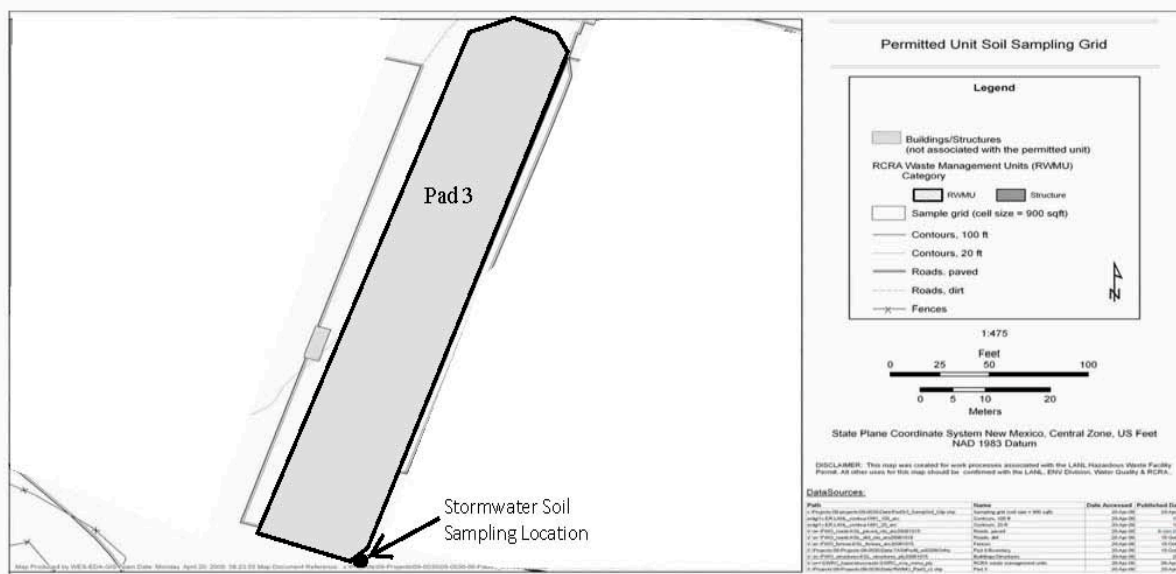
<sup>a</sup>For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (*e.g.*, methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup>Collected only if reusable sampling equipment used.

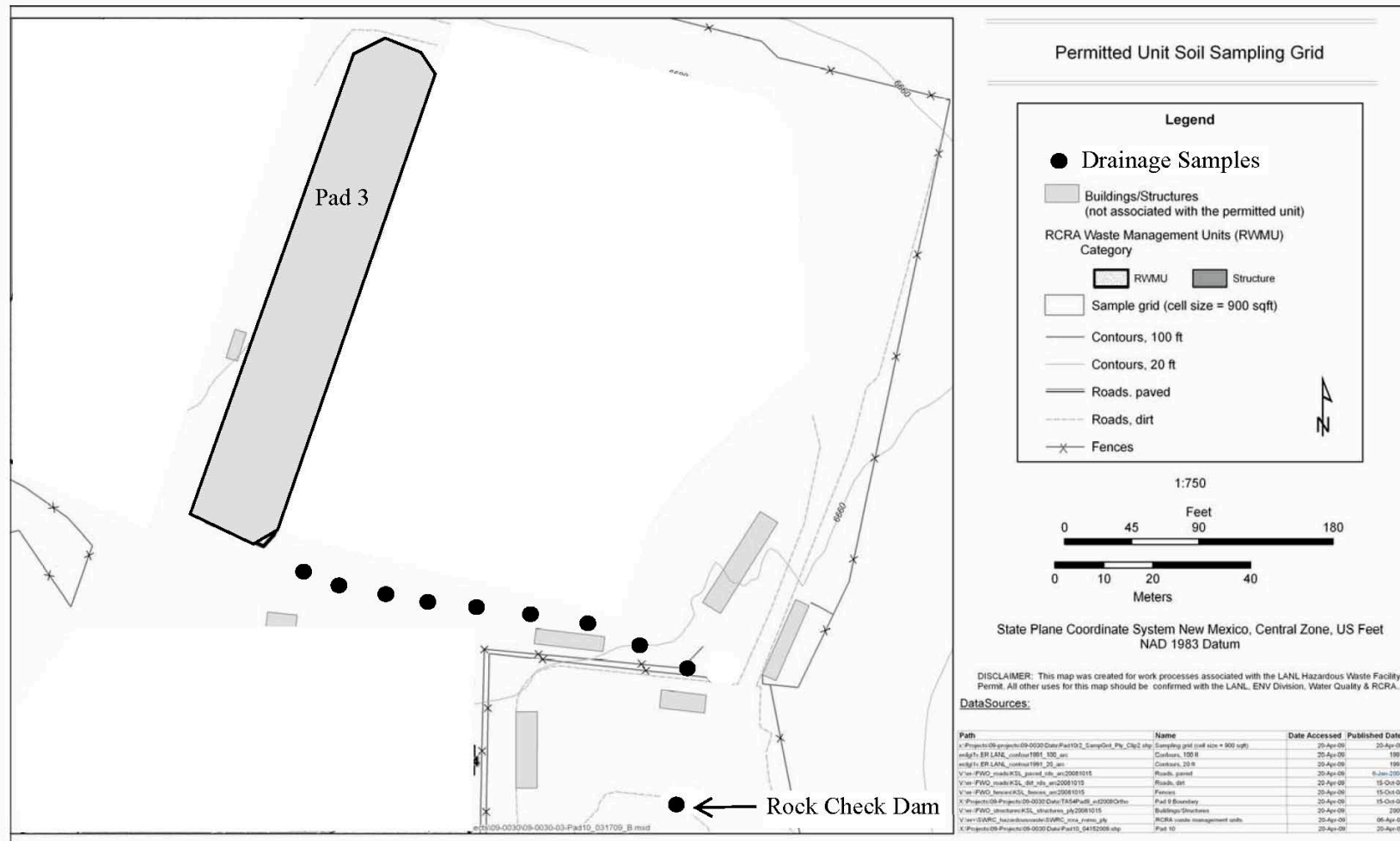
**Table G.7-6**

**List of Equipment at the Technical Area 54 Area G, Pad 3 Outdoor Containers Storage Unit**

<b>Equipment</b>	<b>Decontamination</b>	<b>Disposal</b>
Equipment and spill kit cabinets	X	X
Container pallets	X	X
Communication equipment	X	X
Access barriers and chains	X	X



**Figure G.7-1: Technical Area 54, Area G, Pad 3 Outdoor Container Storage Unit Sampling Grid Locations**



**Figure G.7-2:** Technical Area 54, Area G, Pad 3 Outdoor Container Storage Unit Drainage Sampling Locations



**ATTACHMENT G.8**  
**TECHNICAL AREA 54, AREA G, PAD 5**  
**OUTDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at Technical Area (TA)-54, Area G, Pad 5 at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264 Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions to the plan, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8 to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The permitted unit, which measures 850 feet long and 224 feet wide, is located in the western portion of Area G. It is four inches thick, is sloped 1-2%, and is comprised of three asphalt pads (Pad 5 and older Pads 7 and 8). There are ten structures associated with the permitted unit: two domes (Domes 224 and 49) and eight sheds (sheds 144, 145, 146, 177, 1027, 1028, 1030, and 1041). Rainwater flow at the permitted unit is directed across the pad by slope and drainage structures (*i.e.*, supplemental check berm, culvert, and sediment traps).

Storage Domes 49 and 224 are used for the storage of hazardous waste. They are built of an aluminum framework of trusses covered with tension-fitted ultraviolet resistant, fire-retardant coated, polyester fabric and are anchored to the permitted unit with drift pins and anchor bolts.

Dome 49 is 440 ft long and 60 ft wide, and has a peak height of approximately 26 ft. The dome is equipped with a double-panel rolling door at its north end and has six personnel doors to allow for adequate access both by vehicles and by personnel. The interior perimeter of the dome is surrounded by a 6-inch-high, 8-inch-wide asphalt curb, which helps prevent run-on into, and run-off from, the dome.

Dome 224 is approximately 110 ft long and 60 ft wide, with a peak height of 26 ft. It is equipped with a single-panel roll-up door at the north end and four personnel doors to allow adequate access by vehicles and by personnel. A 1-ft, 8-inch wide by 2-ft, 4-inch deep concrete ring wall designed for secondary containment of liquids surrounds the interior of Dome 224. The asphalt floor is sloped 0.5% towards a concrete sump in the center of the dome. The floor, sump, and curbs are lined with a double layer of HDPE to contain any liquids that might accumulate.

Storage sheds 144, 145, 146, and 177 are prefabricated sheds constructed of steel each measuring six foot long, five foot wide and nine foot high and are elevated by design to prevent run-on. Access to each shed is obtained through a single door where each shed is equipped with a single compartment. Each shed is constructed with a liquid-tight sump to prevent runoff and to contain any potential leaks or spills. The

floor of each shed is constructed of steel coated with chemically-resistant epoxy paint and has a metal grate that covers the entire sump area. Containers are placed directly on the metal grates.

Storage Sheds 1027, 1028, 1029, and 1041 are prefabricated sheds constructed of steel each measuring approximately 23 ft long, nine foot wide and 8.5 ft high. Each shed is equipped with three sets of double doors on one side of the shed for ease of access and have liquid-tight sumps to prevent runoff and contain any potential leaks or spills. The floor of each shed is constructed of a metal grate that covers the sump areas. Containers are placed directly on the metal grates, which prevents contact with liquids that may have accumulated in the sumps. The interior of each shed and sump is coated with chemically-resistant epoxy paint.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information about waste management procedures and hazardous waste constituents stored at the permitted unit.

### **3.0 ESTIMATE OF MAXIMUM WASTE STORED**

Approximately 2,993,000 gallons of hazardous waste has been stored at the permitted unit to date. Throughout the life of this Permit, it is estimated that an additional 3,741,000 gallons of hazardous waste will be stored.

## **4.0 GENERAL CLOSURE REQUIREMENTS**

### **4.1 Closure Performance Standards**

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I.

Closure of the permitted unit will be deemed complete when: 1) all structures, surfaces, and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

## **4.2 Closure Schedule**

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.8-1 in this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR § 264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Soil sampling and decontamination verification sampling activities will be conducted to demonstrate that soils beneath the permitted unit and structures and equipment related to the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated structures and equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe the procedures to be used for closure of the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous waste will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous waste will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.



## **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any finding(s) or action(s) that may influence closure activities or potential sampling locations.

### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed in accordance with Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of any spills or chronic conditions identified in the Operating and Inspections Records).

### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the floors, walls, and ceilings in the sheds and inspecting asphalt pad for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (*see* Section 6.0 in this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

## **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents will be removed from the permitted unit. The permitted unit's structures and related equipment will be decontaminated, removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*), Permit Section 9.4.5, and Facility waste management procedures. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous constituents from the permitted unit to meet the closure performance standards outlined in Permit Section 9.2.

### **5.3.1 Removal of Structures and Related Equipment**

All structures and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

The following structures and related equipment will be removed before the assessment: the tensioned-fabric membranes on the dome structures and the aluminum beams, trusses, and ancillary equipment supporting the domes. The asphalt pad, the materials associated with the asphalt pad (*e.g.*, concrete ringwall, sump structures, and any HDPE liners), and a minimum of six inches of the base course and soil underlying the asphalt pad shall be removed after the assessment. If after removal of the pad (and underlying soil and base course material) the remaining surface shows evidence that the removal to that point has not gathered all appropriate soils and materials associated with the pad, additional soil and

materials will be removed. If it is determined to be appropriate at the time of the assessment, soil samples may be collected through the asphalt (before the pad and its materials have been removed) from areas where contamination is suspected (*i.e.*, locations of stains or known spills).

In the event that alternative closure requirements, in accordance Permit Section 9.2.2.2, are applied to the closure of this permitted unit, the Permittees shall take precautions to not remove or disturb the soil or tuff that overlies the regulated unit (covered under the March 1, 2005 Compliance Order on Consent (Order) (*see* Permit Section 9.3)) beneath the permitted unit.

### **5.3.2 Decontamination of Structures and Related Equipment**

All structures and related equipment that will be reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. This includes: all eight storage sheds; the portable air monitors; all electronic devices and tools; and spill cleanup equipment containers from within the domes (*see* Table G.8-6). This list of equipment requiring decontamination may be revised during the review and assessment which would result in an amendment to this closure plan.

Equipment and operating machinery that is not sensitive to water intrusion, such as the storage sheds and equipment cabinets, will be decontaminated by pressure washing or steam cleaning with a solution consisting of a surfactant detergent (*e.g.*, Alconox®) and water and mixed in accordance with the manufacturer's recommendation. All other equipment at the permitted unit that is sensitive to water intrusion (*i.e.* portable air monitors, electronic devices or tools, spill cleanup equipment containers) will be decontaminated by washing using a wipe-down method with a solution consisting of a surfactant detergent (*e.g.*, Alconox®) and water mixed in accordance with the manufacturer's recommendations.

The quantity of the wash solution will be minimized by dispensing from buckets, spray bottles, or other types of containers. Cloths, or other absorbent cleaning devices, will not be reused to wipe down the equipment after being wetted in the wash solution or after spraying solution onto the equipment. Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during closure decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.8-2 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

## **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance and quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

### **6.1 Soil Sampling and Decontamination Verification Sampling Activities**

Soil sampling and decontamination verification sampling activities will be conducted at the permitted unit in order to verify that soils at the permitted unit, that structures, such as the storage sheds situated on the permitted unit, and equipment related to the permitted unit meet the closure performance standards in

Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment related to the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from the following areas in each of the eight storage sheds:

- a. every wall;
- b. each floor;
- c. each ceiling; and
- d. each sump.

A total of 56 wipe samples will be collected. If there is liquid found in any of the sumps at the time of sample collection, liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of soil samples at the following locations:

- e. one soil sample in front of each of the storage sheds for a total of eight samples (*see* Permit Section 9.4.7.1.ii(1));
- f. one soil sample every 900 square feet of the permitted unit for a total of 95 samples (*see* Permit Section 9.4.7.1.ii(2));
- g. one sample at the sump located in Dome 224 (*see* Permit Section 9.4.7.1.ii(5)); and
- h. nine samples to address stormwater runoff (*see* Permit Section 9.4.7.1.ii(3) and discussion below for rationale of sample locations).

Figure G.8-1 illustrates these sampling locations.

If there is liquid found in the sump in Dome 224 at the time of the assessment a liquid sample will be collected in accordance with Section 6.2.1 of this closure plan.

At the time of sampling, the precise locations of the grid samples will be selected randomly from within each 900 square foot sampling box (*see* Figure G.8-1). These locations will be determined by applying a sub-grid of potential sampling points and randomly choosing one. If the review or assessment determines the need to obtain additional samples within the area of the sampling box (*e.g.*, at asphalt cracks), these sample locations will be in addition to the grid sample locations.

Individual sample locations to address stormwater runoff have been sited by the specific drainage conditions at the permitted unit and are numbered from '1-9' on Figure G.8-1. Sample numbers '1' and '2' are situated to intercept water drainage from former Pad 7; '1' is located at a small supplemental check berm while '2' is at the main culvert draining from former Pad 7. Sample numbers '3', '8', and '9' address drainage from former Pad 8; '3' is located in the area in front of the main door of Dome 224 while 8 and 9 address the drainage from the rest of former Pad 8 on the east side where it is directed by the slope of that pad. Sample numbers '4', '5', '6', and '7' address the potential discharge points for drainage from the permitted unit (Pad 5) and Dome 49; '4' is located on the north side of the main door

of Dome 49, '5' and '6' are situated in sediment traps located in the drainage from the west side of the permitted unit; and '7' is located in a combined drainage area for the east side of the permitted unit and west side of former '7.'

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with the Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 1986 and EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Liquid Sampling**

Liquids will be collected and analyzed to determine if residual hazardous constituents remain in the sumps in the storage sheds at the permitted unit. Liquid samples will be collected using glass or plastic tubes, a composite liquid waste sampler, a bacon bomb, a bailer, or by pouring liquid into sample containers.

### **6.2.2 Wipe Sampling**

Wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on structures or related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.3 Soil and Sediment Sampling**

Soil and sediment samples will be collected and analyzed to determine if hazardous constituents are present in the soils and sediment at the permitted unit. Samples will be collected using a spade, scoop, auger, trowel, or other equipment as specified in approved methods for the type of analytes (*i.e.*, EPA 1996 or 2002) and from the appropriate depths as directed in Permit Section 9.4.7.1.ii. Samples will be kept at their at-depth temperature or lower, protected from ultraviolet light, sealed tightly in the recommended container, and analyzed within the specific holding times listed in Table G.8-4.

### **6.2.4 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

### **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

#### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

##### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until the samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed chain-of-custody form to the Facility and it will become a part of the permanent sampling record documenting the sampling effort.

##### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.8-5 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish these requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, waste, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization, unless the shipper is specifically authorized through formal documentation by that organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.8-3. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.8-3. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2 of this closure plan. The analytical laboratory will have:

- a. a documented comprehensive QA/ QC program;
- b. technical analytical expertise;
- c. a document control and records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.8-4 was based on the following considerations:

- e. the physical form of the waste;
- f. constituents of concern;
- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods” (*SW-846*) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contaminations associated with the sampling and analysis process, and are described in the following sections, along with information on calculations necessary to evaluate the QC results.

#### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.8-5 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

#### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

### **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials; these wastes are listed with potential disposal options in Table G.8-2 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.8-2, will be containerized and managed as waste.

### **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

### **9.0 REFERENCES**

DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.



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- LANL, 1999. "Screening Level Ecological Risk Assessment Methods," LA-UR-99-1406, Los Alamos National Laboratory, Los Alamos, New Mexico.
- NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.
- NMED, 2006. "Technical Background Document for Development of Soil Screening Levels," Rev. 4.0, June 2006, New Mexico Environment Department, Santa Fe, New Mexico.

**Table G.8-1**

**Closure Schedule for the Technical Area 54, Pad 5, Outdoor Container Storage Unit**

Activity	Maximum Time Required
Notify the Department of intent to close.	-45 days
	-20 days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.8-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

Potential Waste Materials	Waste Types	Disposal Options
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded waste management equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Sampling equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Dome structures	Non-regulated solid waste	Subtitle D landfill

Potential Waste Materials	Waste Types	Disposal Options
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Asphalt	Non-regulated solid waste	Subtitle D landfill or potentially, as included in corrective action activities at Area G.
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.

**Table G.8-3**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
Metal Analysis				
Antimony	6010, 7010	ICP-AES, GFAA	20 ug/L	Determine the metal concentration in the samples.
Arsenic	6010, 7010, 7061A	ICP-AES, GFAA, CVAA	10 ug/L	
Barium	6010, 7010	ICP-AES,GFAA	200 ug/L	
Beryllium	6010, 7010	ICP-AES, GFAA	0.2 ug/L	
Cadmium	6010, 7010	ICP-AES, GFAA	2 ug/L	
Chromium	6010, 7010	ICP-AES, GFAA	10 ug/L	
Cobalt	6010, 7010	ICP-AES, GFAA	5 ug/L	
Copper	6010, 7010	ICP-AES, GFAA	5 ug/L	
Lead	6010, 7010	ICP-AES, GFAA	5 ug/L	
Mercury	6010, 7470A, 7471B	ICP-AES, CVAA	0.2 ug/L	
Selenium	6010, 7010, 7741A	ICP-AES, GFAA, CVAA	5 ug/L	
Silver	6010, 7010	ICP-AES, GFAA	10 ug/L	
Thallium	6010, 7010	ICP-AES, GFAA	30 ug/L	
Vanadium	6010, 7010	ICP-AES, GFAA	5 ug/L	
Zinc	6010, 7010	ICP-AES, GFAA	1 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.

compounds (TIC)				
Target compound list SVOCs plus 20 TICs	8270D, 8275	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.
<b><i>Other Parameters</i></b>				
Cyanide	9010, 9012	Colorimetric	20 ug/L	Determine cyanide concentration

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

CVAA = Cold-vapor atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy

GC/MS = Gas chromatography/mass spectrometry

GFAA = Graphite furnace atomic absorption spectroscopy

ICP-AES = Inductively coupled plasma-atomic emission spectrometry

mg/L = milligrams per liter

ug/L = micrograms per liter.

**Table G.8-4**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide-Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4°C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
TCLP/Total Mercury	Aqueous Media:  500-mL Wide-Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Solid Media:  Cool to 4°C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	
Semi-Volatile Organic Compounds			



Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to extraction. 40 days from extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4°C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods,” SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HNO<sub>3</sub> = nitric acid

HCl = hydrochloric acid

L = Liter

mL = milliliter

TCLP = Toxicity Characteristic Leaching Procedure

**Table G.8-5**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

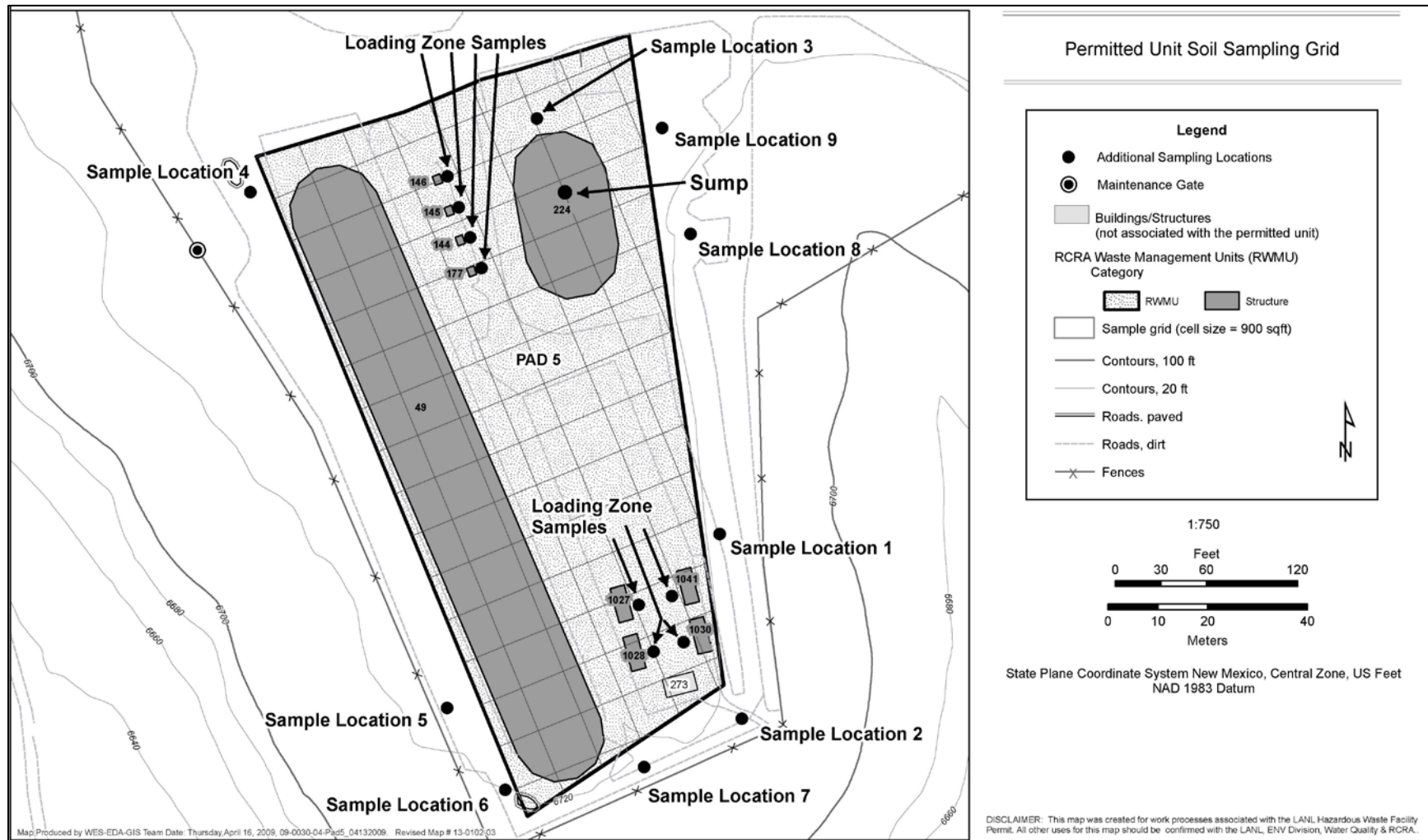
<b>QC Sample Type</b>	<b>Applicable Analysis <sup>a</sup></b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (*e.g.*, methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.

**Table G.8-6**  
**List of Permitted Unit Equipment**

<b>Equipment</b>	<b>Decontamination</b>	<b>Disposal</b>
Equipment and spill kit cabinets	X	X
Container pallets	X	X
Communication equipment	X	X
Access barriers and chains	X	X



**Figure G.8.1 Technical Area 54, Area G, Pad 5, Outdoor Container Storage Unit Soil Sampling Grid and Additional Sampling Locations**

**ATTACHMENT G.9**  
**TECHNICAL AREA 54, AREA G, PAD 6**  
**OUTDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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<u>FIGURE NO.</u>	<u>TITLE</u>
G.9-1	Technical Area 54, Area G, Pad 6 Outdoor Container Storage Unit Sampling Grid and Additional Sampling Locations

## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at Technical Area (TA)-54, Area G, Pad 6 at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions to the plan, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere with the Permit are described below.

The permitted unit is comprised of Pad 6 and is located in the north-central portion of Area G. The pad measures 633 feet long and 99 feet wide or approximately 62,700 square feet. The pad consists of a four to six inch layer of asphalt over the underlying base course overlying fill (minimum six inches of tuff). The pad is sloped from 1% to 1.5% to the south and east for drainage. Additional drainage is directed to the north and east. Rainwater flow at the permitted unit is directed primarily across the pad by the southward slope and into a ditch that runs parallel to the south side of the pad and then drains to the south side of Area G. Secondary rainwater flow is directed to the north/northeast portion of the pad.

Hazardous waste in both liquid and solid form is stored in Domes 153 and 283 on the pad and within transportainer 491 on the south end of the permitted unit; none of these structures are equipped with sumps. The two storage domes (an aluminum framework of trusses covered with tension-fitted ultraviolet resistant, fire-retardant coated, polyester fabric) on the permitted unit vary in size. Dome 153 is 326 feet long by 60 feet wide, covers a surface area of approximately 19,600 square feet, has a double-panel rolling door located at the west end, and has ten personnel doors located approximately every 40 to 125 feet along its length. Dome 283 is 260 feet long by 60 feet wide, covers an area of approximately 15,600 square feet, has a double-panel rolling door located at the east end, and has ten personnel doors located approximately every 50 feet along its length. The base of each dome is secured with standard drift pins. A 6-inch by 8-inch high asphalt curb surrounds the interior floor perimeter of both domes and provides run-on and run-off protection. The curb is designed to retain any liquids that may accumulate within the domes. An asphalt ramp is located at the vehicle entrance (*i.e.*, double-panel rolling door) to each dome which allows vehicles and container handling equipment to pass safely over the curb. Dome 283 also contains a Conex structure that serves as a control room. The control room is approximately 8 feet wide, 20 feet long and 8 feet high.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information about waste management procedures and hazardous waste constituents stored at the permitted unit.

### **3.0 ESTIMATE OF MAXIMUM WASTE STORED**

Approximately 2,867,000 gallons of hazardous waste has been stored at the permitted unit to date. Throughout the life of this Permit, it is estimated that an additional 3,584,000 gallons of hazardous waste will be stored.

## **4.0 GENERAL CLOSURE REQUIREMENTS**

### **4.1 Closure Performance Standard**

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents;
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater;
- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I.

Closure of the permitted unit will be deemed complete when: 1) all structures, surfaces, and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

### **4.2 Closure Schedule**

This closure plan schedule is intended to address closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.9-1 in this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR § 264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Soil sampling and decontamination verification sampling activities will be conducted to demonstrate that soils, surfaces, structures, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated structures and equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe the procedures to be used for closure of the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous wastes will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any finding(s) or action(s) that may influence closure activities or additional sampling locations.

### 5.2.1 Records Review

The Facility Operating and Inspection Records shall be reviewed in accordance with Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of any spills or chronic conditions identified in the Operating and Inspection Records).

### 5.2.2 Structural Assessment

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the floor, walls, and ceiling in the transportainer (491) as well as inspecting the asphalt pad for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

## 5.3 Decontamination and Removal of Structures and Related Equipment

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents will be removed from the permitted unit. The permitted unit's structures and related equipment will be decontaminated, removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*), Permit Section 9.4.5, and Facility waste management procedures. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous constituents from the permitted unit in order to meet the closure performance standards outlined in Permit Section 9.2.

### 5.3.1 Removal of Structures and Related Equipment

All structures and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

The tensioned-fabric membranes on the dome structure as well as the aluminum beams, trusses, and ancillary equipment supporting the domes will be removed before the structural assessment. The asphalt pad, the materials associated with the asphalt pad (curbing and ramps), and a minimum of 6 inches of the base course and soil underlying the asphalt pad will be removed after the assessment. If after the removal of the pad (and underlying soil and base course material) the remaining surface shows evidence that the removal to that point has not gathered all appropriate soils and materials associated with the pad, additional soil and materials will be removed. If it is determined to be appropriate at the time of the assessment, soil samples may be collected through the asphalt (before the pad and its materials have been removed) from areas where contamination is suspected (*i.e.*, locations of stains or known spills).

In the event that alternative closure requirements, in accordance Permit Section 9.2.2.2, are applied to the closure of this permitted unit, the Permittees shall take precautions to not remove or disturb the soil or tuff

that overlies the regulated unit (covered under the March 1, 2005 Compliance Order on Consent (Order) (*see* Permit Section 9.3)) beneath the permitted unit.

### **5.3.2 Decontamination of Structures and Equipment**

All structures and related equipment that will be reused by the Facility will be decontaminated (*see* Table G.9-6) in accordance with Permit Section 9.4.3.1. This includes: the transportainer; the equipment cabinets; the portable air monitors; all the electronic devices and tools; and the spill cleanup equipment containers. This list of equipment requiring decontamination will be revised during the review and assessment (*see* Section 5.2 of this closure plan).

Equipment and operating machinery that is not sensitive to water intrusion, such as the transportainer and equipment cabinets, will be decontaminated by steam cleaning or pressure washing with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water mixed in accordance with the manufacturer's recommendations. All other equipment at the permitted unit that is sensitive to water intrusion (*i.e.*, portable air monitors, electronic devices or tools, and spill cleanup equipment containers) will be decontaminated by washing using a wipe-down method with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water mixed in accordance with the manufacturer's recommendations.

The quantity of the wash solution will be minimized by dispensing from buckets, spray bottles, or other types of containers. Cloths, or other absorbent cleaning devices, will not be reused to wipe down the equipment after being wetted in the wash solution or after spraying solution onto the equipment. Portable berms, or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during closure decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.9-2, in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

## **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific closure sampling and analysis requirements of Permit Section 9.4.7 and describes the sampling, analysis, quality assurance and quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

### **6.1 Soil Sampling and Decontamination Verification Wipe Sampling Activities**

Soil sampling and decontamination verification wipe sampling activities will be conducted at the permitted unit in order to verify that soils, surfaces, structures, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of one wipe sample from each wall, floor, and ceiling of the transportainer (491) for a minimum of 6 wipe samples.

In compliance with Permit Section 9.4.7.1.ii.a, this closure plan will ensure the collection of soil samples in the following locations:

- a. one soil sample in front of the transportainer (491) (*see* Permit Section 9.4.7.1.ii.a(1));
- b. one soil sample every 900 square feet of the permitted unit for a total of 68 samples (*see* Permit Section 9.4.7.1.ii.a(2)); and
- c. three soil samples to address stormwater runoff (*see* Permit Section 9.4.7.1.ii.a(3) and discussion below for rationale of sample locations).

Figure G.9-1 illustrates these sampling locations.

At the time of sampling, the precise locations of the grid samples will be randomly selected within each 900 square foot sampling box (*see* Figure G.9-1). These locations will be determined by applying a sub-grid of potential sampling points and randomly choosing one. If the review or assessment determines the need to obtain additional samples collected within the area of the sampling box (*e.g.*, at asphalt cracks), these sample locations will be in addition to the grid sample locations.

Individual sample locations to address stormwater runoff have been sited by the specific drainage conditions at the permitted unit and are numbered from '1-3' on Figure G.9-1. Sample number '1' will be collected just off the southern portion of the pad in the ditch. Sample number '2' will be collected just off the northern portion of the pad. Sample number '3' will be collected at the sediment trap located northeast of the permitted unit.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 1986 and EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Wipe Sampling**

Surface wipe samples will be collected and analyzed used to determine if residual hazardous constituents remain on the structures and related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.2 Soil Sampling**

Soil samples will be collected and analyzed to determine if hazardous constituents are present in soils at and in the vicinity of the permitted unit. Soil samples will be collected using a spade, scoop, auger,

trowel, or other equipment as specified in approved methods for the type of analytes (*i.e.*, EPA 1996 or 2002) and from the appropriate depths as directed in Permit Section 9.4.7.1.ii. Samples will be kept at their at-depth temperature or lower, protected from ultraviolet light, sealed tightly in the recommended container, and analyzed within the specific holding times listed in Table G.9-5.

### **6.2.3 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

## **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until the samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed original chain-of-custody form to the Facility and it will become a part of the permanent sampling record documenting the sampling effort.



#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

#### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.9-5 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and

holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish these requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, waste, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization, unless the shipper is specifically authorized through formal documentation by that organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all the hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.9-3. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.9-3. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2. The analytical laboratory will have:

- a. a documented comprehensive QA/ QC program;
- b. technical analytical expertise;
- c. a document control/records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.9-3 was based on the following considerations:

- e. the physical form of the waste;
- f. constituents of concern;
- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

#### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods” (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contamination associated with the sampling and analysis process, and is described in the following sections, along with information on calculations necessary to evaluate the QC results.

##### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.9-5 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

##### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

### **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste

management procedures. Closure activities may generate different types of waste materials: these wastes are listed with potential disposal options in Table G.9-2 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.9-2, will be containerized and managed as waste.

## **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## **9.0 REFERENCES**

- DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington
- EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.
- EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, D.C.
- LANL, 1999. "Screening Level Ecological Risk Assessment Methods," LA-UR-99-1406, Los Alamos National Laboratory, Los Alamos, New Mexico.
- NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.
- NMED, 2006. "Technical Background Document for Development of Soil Screening Levels," Rev. 4.0, June 2006, New Mexico Environment Department, Santa Fe, New Mexico.

**Table G.9-1**

**Closure Schedule for the Technical Area 54, Area G, Pad 6 Outdoor Container Storage Unit**

<b>Activity</b>	<b>Maximum Time Required</b>
Notify the Department of intent to close.	-45 days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	Day 100
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.9-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Verification water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	RLWTF

**Table G.9-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded waste management equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Sampling equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

**Table G.9-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Dome structures	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Asphalt	Non-regulated solid waste	Subtitle D landfill or potentially, as included in corrective action activities at Area G.
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.



**Table G.9-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.

**Table G.9-3**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
Metal Analysis				
Antimony	6010, 7010	ICP-AES, GFAA	20 ug/L	Determine the metal concentration in the samples.
Arsenic	6010, 7010, 7061A	ICP-AES, GFAA, CVAA	10 ug/L	
Barium	6010, 7010	ICP-AES,GFAA	200 ug/L	
Beryllium	6010, 7010	ICP-AES, GFAA	0.2 ug/L	
Cadmium	6010, 7010	ICP-AES, GFAA	2 ug/L	
Chromium	6010, 7010	ICP-AES, GFAA	10 ug/L	
Cobalt	6010, 7010	ICP-AES, GFAA	5 ug/L	
Copper	6010, 7010	ICP-AES, GFAA	5 ug/L	
Lead	6010, 7010	ICP-AES, GFAA	5 ug/L	
Mercury	6010, 7470A, 7471B	ICP-AES, CVAA	0.2 ug/L	
Selenium	6010, 7010, 7741A	ICP-AES, GFAA, CVAA	5 ug/L	
Silver	6010, 7010	ICP-AES, GFAA	10 ug/L	
Thallium	6010, 7010	ICP-AES, GFAA	30 ug/L	
Vanadium	6010, 7010	ICP-AES, GFAA	5 ug/L	
Zinc	6010, 7010	ICP-AES, GFAA	1 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.

compounds (TIC)				
Target compound list SVOCs plus 20 TICs	8270D, 8275	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.
<b><i>Other Parameters</i></b>				
Cyanide	9010, 9012	Colorimetric	20 ug/L	Determine cyanide concentration

<sup>a</sup> EPA, 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

CVAA = Cold-vapor atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy

GC/MS = Gas chromatography/mass spectrometry

GFAA = Graphite furnace atomic absorption spectroscopy

ICP-AES = Inductively coupled plasma-atomic emission spectrometry

mg/L = milligrams per liter

ug/L = micrograms per liter.

**Table G.9-4**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide-Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4°C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
Total Mercury	Aqueous Media:  500-mL Wide-Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Solid Media:  Cool to 4°C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	
Semi-Volatile Organic Compounds			

Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to extraction. 40 days from extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4°C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, EPA, 1986 and all approved updates.

°C = degrees Celsius

HNO<sub>3</sub> = nitric acid

HCl = hydrochloric acid

L = Liter

mL = milliliter

TCLP = Toxicity Characteristic Leaching Procedure

**Table G.9-5**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

<b>QC Sample Type</b>	<b>Applicable Analysis <sup>a</sup></b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

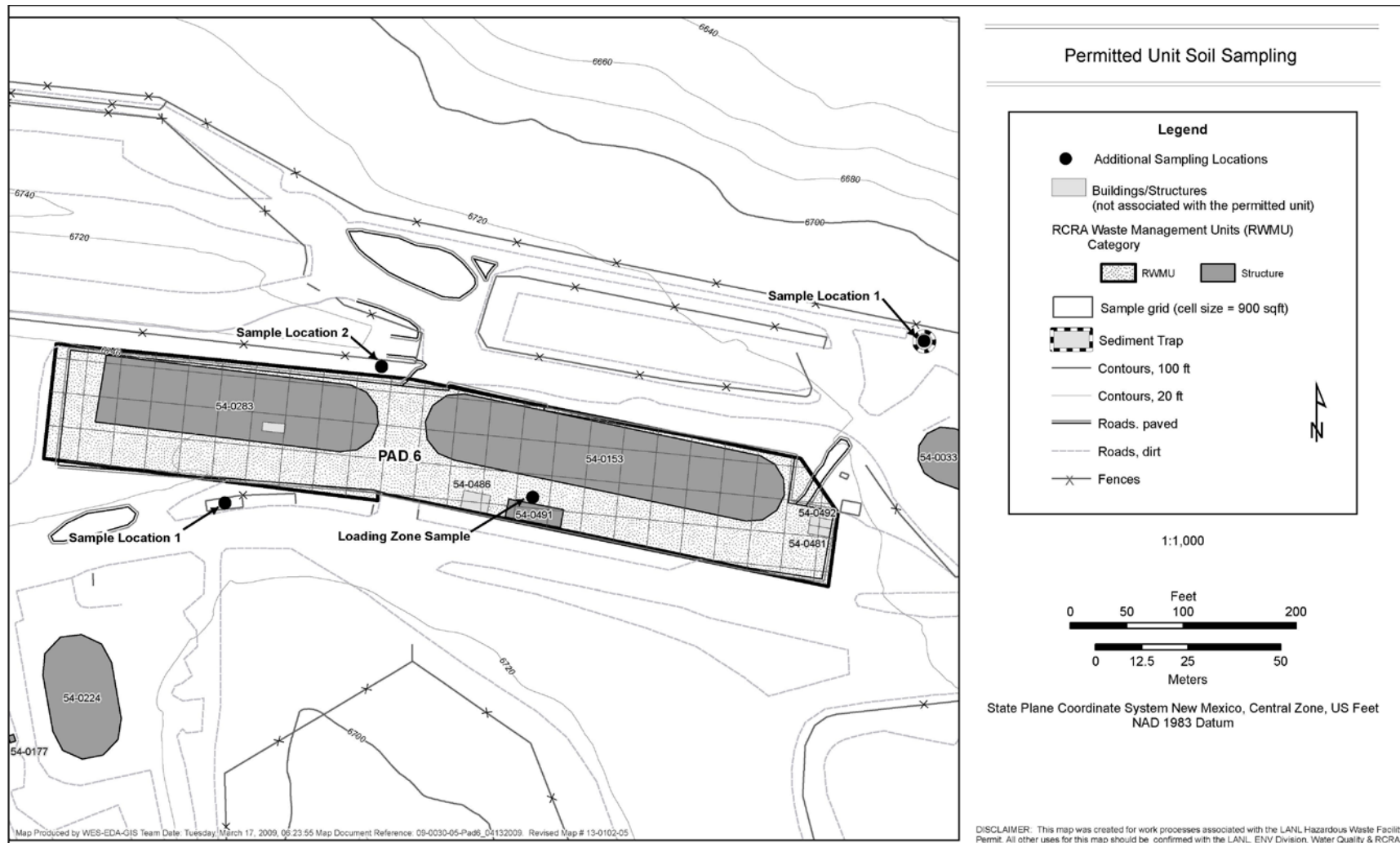
<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (*e.g.*, methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.

**Table G.9-6**

**List of Equipment at the Technical Area 54, Area G, Pad 6 Outdoor Container Storage Unit**

Equipment	Decontamination	Disposal
Any storage transportainers on Pad 6	X	X
Equipment and spill kit cabinets	X	X
Container pallets	X	X
Communication equipment	X	X
Access barriers and chains	X	X



**Figure G.9-1:** Technical Area 54, Area G, Pad 6 Outdoor Container Storage Unit Sampling Grid and Additional Sampling Locations



**ATTACHMENT G.10**  
**TECHNICAL AREA 54, AREA G, PAD 9**  
**OUTDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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<u>FIGURE NO.</u>	<u>TITLE</u>
G.10-1	Technical Area 54, Area G, Pad 9 Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations

## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at Technical Area (TA)-54, Area G, Pad 9 at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions to the plan, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8 to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The permitted unit is comprised of an asphalt pad which is located in the eastern end of Area G. It was constructed in 1993, consists of a four to six inch layer of asphalt over the underlying base course overlying fill (minimum six inches of tuff), and measures 570 feet long and 275 feet wide, or approximately 158,000 square feet. It is constructed with curbing on the west and east sides and is sloped from 1% to 1.5% to the east and south-east for drainage. Rainwater flow is directed across the pad by the eastward slope and through small PVC drains spaced at 55 foot intervals in the curbing along the east side of the pad. The slope below the curbing is protected with rock and concrete. Concrete curbing also extends along the west and partially the south sides of the pad and ends at a concrete and rock drainage structure. The remainder of the south side of the pad is uncurbed. Four domes (Domes 229, 230, 231, 232), and one storage shed (574) are situated on it (*see* Figure G.10-1). The one storage shed is not used for the storage of hazardous waste.

The permitted unit has stored the following waste types: solidified inorganic solids; leached process residues; salts and cement paste; ash; dewatered aqueous sludge; chemical treatment sludge; soils; combustible debris (*e.g.*, plastics, rubber, laboratory trash, building debris); and heterogeneous debris. Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information regarding waste management procedures and hazardous waste constituents stored at the permitted unit.

### 2.1 Permitted Unit Domes

The four storage domes at the permitted unit have been used for the storage of hazardous waste in both liquid and solid form since 1994. The domes (an aluminum framework of trusses covered with tension-fitted ultraviolet resistant, fire-retardant coated, polyester fabric) are 246 feet long by 89 feet wide and cover a surface area of approximately 20,400 square feet each. The base of each dome is secured with anchor bolts to a concrete ring wall that surrounds the interior floor perimeter and provides run-on and

run-off protection. The ring wall is designed to retain any liquids that may accumulate within the domes. Each dome has several personnel doors around the perimeter of the dome and a larger vehicle access door and ramp on the west end.

Dome 231 contains a Perma-Con<sup>®</sup> modular panel containment structure (68 feet long x 28 feet wide) used for the remediation of transuranic waste prior to shipment to the Waste Isolation Pilot Plant. Domes 229 and 232 have been used only for the storage of non-liquid hazardous waste and Dome 230 and 231 have been used for the storage of both liquid and non-liquid hazardous waste.

### **2.1.1 Domes 229, 231, and 232 Fire Water Collection System**

The permitted unit has a fire water collection system that collects water from Domes 232, 231, and Dome 226 on Pad 1. The system was designed to provide an augmented fire water collection capability to limit run-off of fire suppression waters from the domes if the volume of water during a fire exceeded their collection capacity. Fire suppression water from the domes is collected via a pipeline that runs from Pad 1 and down the east side of the permitted unit below the asphalt. The pipeline is sloped to provide gravity flow. The southeast portions of Domes 231 and 232 have three drain inlets each and Dome 226 has two drain inlets on the south end that connect to this pipeline. The pipeline terminates in the concrete walled semi-circular collection sump (lined with high density polyethylene plastic) in the east end of Dome 229. The semi-circular sump, which measures 70 feet by 28 feet and 26 inches in depth, is not intended for secondary containment of liquid waste and has not been used as such based on review of the permitted unit's Operating Record.

### **2.1.2 Dome 230 Secondary Containment**

Dome 230 has a concrete walled semi-circular sump (lined with high density polyethylene plastic) at the east end of the dome and double high density polyethylene layers under the pad that act as secondary containment for liquid waste. The design of the sump is similar to that of Dome 229 as described above except that the sump in Dome 230 is not connected to an external drain system. The maximum capacity of accumulated liquids within the concrete sump and the curbed area of the dome are approximately 48,000 gallons.

## **3.0 ESTIMATE OF MAXIMUM WASTE STORED**

Approximately 6,400,000 gallons of hazardous waste has been stored at the permitted unit to date. Throughout the life of this Permit, it is estimated that an additional 9,000,000 gallons of hazardous waste will be stored.

## **4.0 GENERAL CLOSURE REQUIREMENTS**

### **4.1 Closure Performance Standards**

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the

cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- e. minimize the need for further maintenance;
- f. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- g. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I.

Closure of the permitted unit will be deemed complete when: 1) all structures and related equipment have been decontaminated or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

#### 4.2 Closure Schedule

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.10-1 of this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR §264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit structures and related equipment.



Soil sampling and decontamination verification sampling activities will be conducted to demonstrate that soils, surfaces, structures, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe the procedures to be used for closure of the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous waste will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport from the permitted unit. Appropriate shipping documentation will be prepared for the wastes during transport. Containers holding hazardous waste will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any finding(s) or action(s) that may influence closure activities or additional sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed in accordance with Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of any spills or chronic conditions identified in the Operating and Inspection Records).

#### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the floors, walls, and ceilings in the PermaCon®, as well as inspecting the asphalt pad, for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan)

to add these sampling locations and applicable sampling procedures. This inspection will be documented with photographs and drawings, as necessary.

### **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents will be removed from the permitted unit. The permitted unit's structures and related equipment will be decontaminated, removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*), Permit Section 9.4.5, and Facility waste management procedures. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous constituents from the permitted unit to meet the closure performance standards outlined in Permit Section 9.2.

#### **5.3.1 Removal of Structures and Related Equipment**

All structures and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

The PermaCon<sup>®</sup> and the tensioned-fabric membranes on the domes (as well as the aluminum beams, trusses, and ancillary equipment supporting the domes) will be removed before the assessment. The asphalt pad, the materials associated with the asphalt pad (*e.g.*, concrete ringwall, sumps, liner) and a minimum of six inches of the base course and soil underlying the asphalt pad will be removed after the assessment.

If after the removal of the pad (and underlying soil and base course material) the remaining surface shows evidence that the removal to that point has not gathered all appropriate soils and materials associated with the pad, additional soil and materials will be removed. If it is determined to be appropriate at the time of the assessment, soil samples may be collected through the asphalt (before the pad and its materials have been removed) from areas where contamination is suspected (*i.e.*, locations of stains or known spills).

In the event that alternative closure requirements, in accordance Permit Section 9.2.2.2, are applied to the closure of this permitted unit, the Permittees shall take precautions to not remove or disturb the soil or tuff that overlies the regulated unit (covered under the March 1, 2005 Compliance Order on Consent (Order) (see Permit Section 9.3)) beneath the permitted unit.

#### **5.3.2 Decontamination of Equipment**

All structures and related equipment that will be reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. This includes: the portable air monitors; all electronic devices and tools; and the spill cleanup equipment containers from within the domes (*see* Table G.10-6). This list of equipment requiring decontamination will be revised, if necessary, during the review and assessment.

Equipment and operating machinery that is not sensitive to water intrusion, such as the equipment cabinets in Dome 231, will be decontaminated by pressure washing or steam cleaning with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water mixed in accordance with the manufacturer's recommendations. All other equipment at the permitted unit that is sensitive to water intrusion (*i.e.*, portable air monitors, electronic devices or tools, PPE, portable eyewashes, spill cleanup equipment containers) will be decontaminated by washing using a wipe-down method with a solution

consisting of a surfactant detergent (*e.g.*, Alconox®) and water mixed in accordance with the manufacturer's recommendations.

The quantity of the wash solution will be minimized by dispensing from buckets, spray bottles, or other types of containers. Cloths, or other absorbent cleaning devices, will not be reused to wipe down the equipment after being wetted in the wash solution or after spraying solution onto the equipment. Portable berms, or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment), will collect excess wash water and provide containment during the decontamination process. The fire suppression water drains in domes 229, 231 and 232 will be plugged so as to not allow wash water to enter.

#### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during closure decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and equipment that cannot be decontaminated will be containerized and managed as waste, as summarized in Table G.10-2 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

### **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance and quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

#### **6.1 Soil Sampling and Decontamination Verification Sampling Activities**

Soil sampling and decontamination verification sampling activities will be conducted at the permitted unit in order to verify that soils, structures, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment.

In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of soil samples in the following locations:

- a. two samples in front of where structure 362 was located (*see* Permit Section 9.4.7.1.ii(1));
- b. one sample every 900 square feet of the permitted unit for a total of 170 samples (*see* Permit Section 9.4.7.1.ii(2));
- c. one sample to the south of the permitted unit at the stormwater discharge drainage location ('sample location 1') (*see* Permit Section 9.4.7.1.ii(3));
- d. one sample at the discharge point in the sump in Dome 229 for the fire water collection system ('sample location 2') (*see* Permit Section 9.4.7.1.ii(4));
- e. one sample at each location (eastern portion of the permitted unit) where the slope of the permitted unit ends in soil below each PVC drain for a total of ten samples (*see* Permit Section 9.4.7.1.ii(4));

- f. one sample at each drain in Domes 232 and 231 and one sample at each sump in Dome 229 and 230 for a total of eight samples (*see* Permit Section 9.4.7.1.ii(5));
- g. one sample at the joints and intersections of the fire water collection system piping (*see* Permit Section 9.4.7.1.ii(7)); and
- h. one sample, at 30 foot intervals, just off the southern end of the permitted unit along the uncurbed portion of the drainage structure for a total of five samples (*see* Permit Section 9.4.7.1.ii(8)).

All soil sample locations are illustrated on Figure G.10-1.

If liquid is present in any of the drains, sumps, or piping at the time of the assessment, a liquid sample will be collected in accordance with Section 6.2.1 of this closure plan.

At the time of sampling, the precise locations of the grid samples will be randomly selected within each 900 square foot sampling box (*see* Figure G.10-1). These locations will be determined by applying a sub-grid of potential sampling points and randomly choosing one. If the review or assessment determines the need to obtain additional samples collected within the area of the sampling box (*e.g.*, at asphalt cracks), these sample locations will be in addition to the grid sample locations.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with the Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 1986 and EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Liquid Sampling**

Liquid samples will be collected and analyzed to determine if residual hazardous constituents are present in the drains, sumps, or pipes at the permitted unit. Liquid samples will be collected using glass or plastic tubes, a composite liquid waste sampler, a bacon bomb, a bailer, or by pouring liquid into sample containers.

### **6.2.2 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on the structures and related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.3 Soil Sampling**

Soil samples will be collected and analyzed to determine if hazardous constituents are present in soils at the permitted unit. Soil samples will be collected using a spade, scoop, auger, trowel, or other equipment as specified in approved methods for the type of analytes (*i.e.*, EPA 1996 or 2002) and from the appropriate depths as directed in Permit Section 9.4.7.1.ii. Samples will be kept at their at-depth temperature or lower, protected from ultraviolet light, sealed tightly in the recommended container, and analyzed within the specific holding times listed in Table G.10-4.

### **6.2.4 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper

## **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until the samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request/chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory

analysis. The analytical laboratory will return the completed chain-of-custody form to the Facility and it will become a part of the permanent sampling record documenting the sampling effort.

#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.10-4 presents the requirements in SW-846 (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish these requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, waste, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization, unless the shipper is specifically authorized through formal documentation by that organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all the hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.10-3. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.10-3. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2 of this closure plan. The analytical laboratory will have:

- a. a documented comprehensive QA/QC program;
- b. technical analytical expertise;
- c. a document control and records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.10-3 was based on the following considerations:

- e. the physical form of the waste;
- f. constituents of concern,
- g. required detection limits (*e.g.*, regulatory thresholds); and

- h. information requirements (*e.g.*, waste classification).

#### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods” (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contaminations associated with the sampling and analysis process, and are described in the following sections, along with information on calculations necessary to evaluate the QC results.

##### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.10-5 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

##### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe the analysis in sufficient detail so that the data user can understand how the sample was analyzed.



## 7.0 WASTE MANAGEMENT

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials; these wastes are listed with potential disposal options in Table G.10-2 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.10-2, will be containerized and managed as waste.

## 8.0 CLOSURE CERTIFICATION REPORT

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## 9.0 REFERENCES

- DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.
- EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.
- EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, D.C.
- LANL, 1999. "Screening Level Ecological Risk Assessment Methods," LA-UR-99-1406, Los Alamos National Laboratory, Los Alamos, New Mexico.
- NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.
- NMED, 2006. "Technical Background Document for Development of Soil Screening Levels," Rev. 4.0, June 2006, New Mexico Environment Department, Santa Fe, New Mexico.

**Table G.10-1**

**Closure Schedule for the Technical Area 54, Area G, Pad 9 Outdoor Container Storage Unit**

<b>Activity</b>	<b>Maximum Time Required</b>
Notify the Department of intent to close.	-45 days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal 100 or days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.10-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

Potential Waste Materials	Waste Types	Disposal Options
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded waste management equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Sampling equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Dome structures	Non-regulated solid waste	Subtitle D landfill

Potential Waste Materials	Waste Types	Disposal Options
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Asphalt	Non-regulated solid waste	Subtitle D landfill or potentially, as included in corrective action activities at Area G.
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.

**Table G.10-3**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
Metal Analysis				
Antimony	6010, 7010	ICP-AES, GFAA	20 ug/L	Determine the metal concentration in the samples.
Arsenic	6010, 7010, 7061A	ICP-AES, GFAA, CVAA	10 ug/L	
Barium	6010, 7010	ICP-AES,GFAA	200 ug/L	
Beryllium	6010, 7010	ICP-AES, GFAA	0.2 ug/L	
Cadmium	6010, 7010	ICP-AES, GFAA	2 ug/L	
Chromium	6010, 7010	ICP-AES, GFAA	10 ug/L	
Cobalt	6010, 7010	ICP-AES, GFAA	5 ug/L	
Copper	6010, 7010	ICP-AES, GFAA	5 ug/L	
Lead	6010, 7010	ICP-AES, GFAA	5 ug/L	
Mercury	6010, 7470A, 7471B	ICP-AES, CVAA	0.2 ug/L	
Selenium	6010, 7010, 7741A	ICP-AES, GFAA, CVAA	5 ug/L	
Silver	6010, 7010	ICP-AES, GFAA	10 ug/L	
Thallium	6010, 7010	ICP-AES, GFAA	30 ug/L	
Vanadium	6010, 7010	ICP-AES, GFAA	5 ug/L	
Zinc	6010, 7010	ICP-AES, GFAA	1 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.

compounds (TIC)				
Target compound list SVOCs plus 20 TICs	8270D, 8275	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.
<b><i>Other Parameters</i></b>				
Cyanide	9010, 9012	Colorimetric	20 ug/L	Determine cyanide concentration

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

CVAA = Cold-vapor atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy

GC/MS = Gas chromatography/mass spectrometry

GFAA = Graphite furnace atomic absorption spectroscopy

ICP-AES = Inductively coupled plasma-atomic emission spectrometry

mg/L = milligrams per liter

ug/L = micrograms per liter.

**Table G.10-4**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
TCLP Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide-Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4°C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
TCLP/Total Mercury	Aqueous Media:  500-mL Wide-Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon- Lined Septa	Solid Media:  Cool to 4°C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	
Semi-Volatile Organic Compounds			



Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to preparative extraction. 40 days from preparative extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4°C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods,” SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HNO<sub>3</sub> = nitric acid

HCl = hydrochloric acid

L = Liter

mL = milliliter

TCLP = Toxicity Characteristic Leaching Procedure

**Table G.10-5**  
**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

QC Sample Type	Applicable Analysis <sup>a</sup>	Frequency	Acceptance Criteria
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

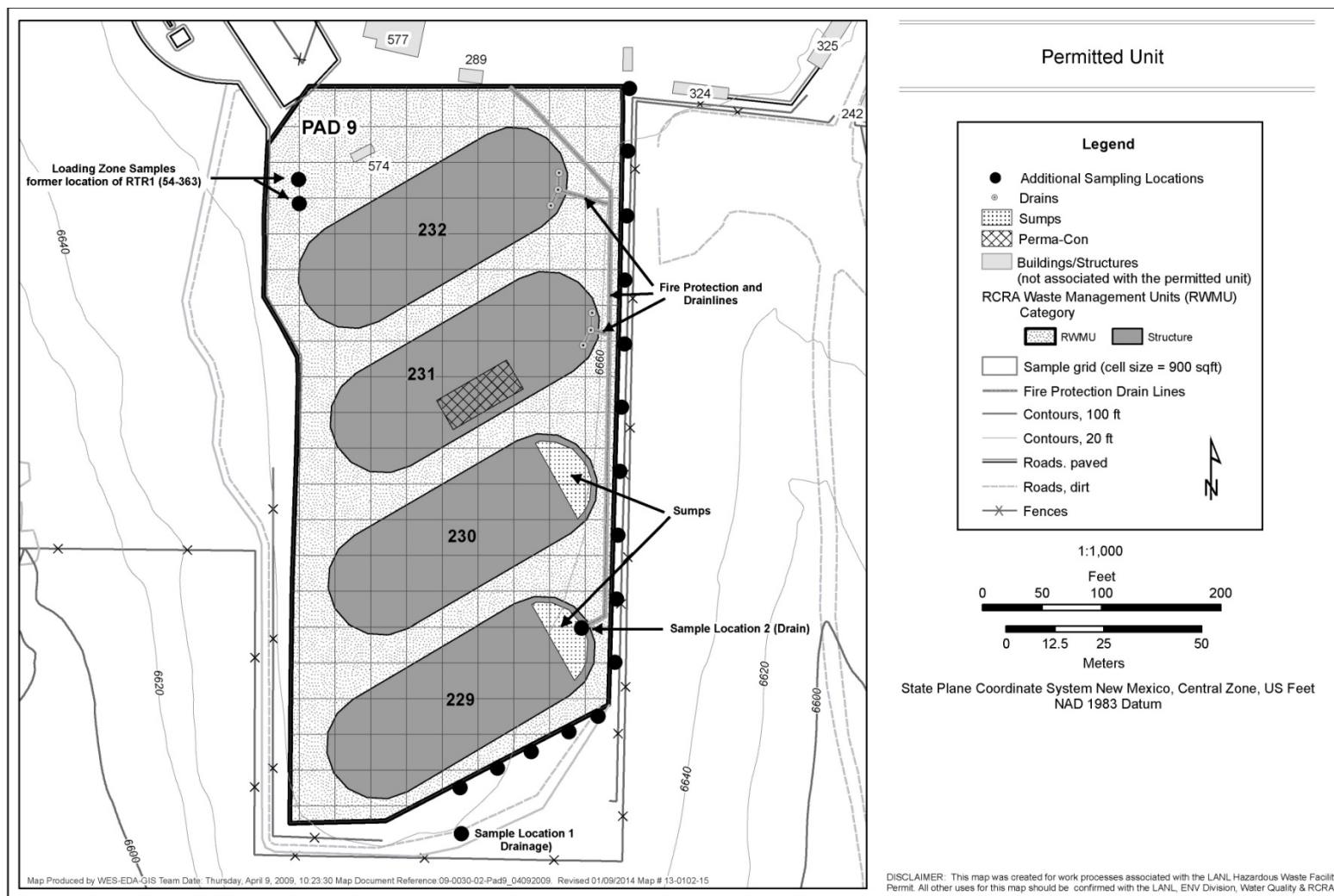
<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (e.g., methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.

**Table G.10-6**

**List of Equipment at the Technical Area 54, Area G, Pad 9 Outdoor Container Storage Unit**

Equipment	Decontamination	Disposal
PermaCon <sup>®</sup> in Dome 231 and associated equipment	X	
Two storage sheds	X	
Equipment and spill kit cabinets	X	
Air pallets	X	
Container pallets	X	X
Communication equipment	X	X
Access barriers and chains	X	X



**Figure G.10-1: Technical Area G, Pad 9 Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations**

**ATTACHMENT G.11**  
**TECHNICAL AREA 54, AREA G, PAD 10**  
**OUTDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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<u>FIGURE NO.</u>	<u>TITLE</u>
G.11-1	Technical Area 54, Area G, Pad 10 Outdoor Container Storage Unit Sampling Grid and Additional Sampling Locations

## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at Technical Area (TA)-54, Area G, Pad 10 at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions to the plan, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The permitted unit, which is an asphalt pad that measures 350 feet (ft) long and 250 ft wide (approximately 89,600 square ft), is located on the eastern end of Area G. The irregular-shaped, asphalt pad (Pad 10) is 4-6 inches (in.) thick and overlies approximately six inches of underlying base course and overlies about six inches of tuff fill. The permitted unit was constructed in 2003 and covers two previously existing pads (Pads 2 and 4). It is constructed with curbing on the north and partially the east sides and is sloped from approximately 1% to 1.5% to the east and south-east for drainage.

Transuranic waste characterization trailers are situated on the permitted unit and hazardous waste containers are stored near the trailers for staging associated with the waste characterization. Large portions of the permitted unit are also used for storage of feed stock empty drums for the transuranic waste characterization activities. Storage of oversized mixed wastes in transporters and metal boxes also occurs on the permitted unit. The current hazardous waste storage activities at the permitted unit include the following structures:

**TA54-0497, RTR2** - The Real-Time Radiography (RTR) system #2 is designed to provide X-ray examination of the contents of a waste drum. The unit has been located on Pad 10 in support of the DOE Carlsbad Central Characterization Project (CCP) operations.

**TA54-0498, LANL HENC** - The High-Efficiency Neutron Counter (HENC) is designed to provide a passive neutron and gamma measurement of transuranic waste in 55-gallon containers. The HENC supported the Transuranic Waste Characterization Project and Project 2010 and subsequently CCP operations from 2004 to the present.

**TA54-0506, MCS HENC** - The Canberra MCS HENC is functionally identical to the TA-54-0498 HENC and provides passive neutron and gamma assays of 55-gal waste drums.

**TA 54-0547, Super High Efficiency Neutron Coincidence (SuperHENC) counter** - Trailer TA-54-0547 houses a high efficiency neutron counter designed to handle large waste containers. It is designed to provide a passive neutron and gamma measurement of large transuranic waste containers like standard waste boxes. The SuperHENC will support the Facility's Transuranic Waste Characterization Project and Central Characterization Project operations beginning in 2010.

**TA54-0545 and 546, Storage trailers** - Heated transportainers used for waste container storage and equilibration prior to characterization.

The above structures are used for non-destructive assay (NDA) techniques associated with the radioactive characterization for the Waste Isolation Pilot Plant certification of waste containers or in support of those activities. The characterization provided by the NDA monitoring techniques does not involve opening the waste containers. The other trailers and structures provide: 1) shelter for the radioassay equipment, 2) enclosed areas to stabilize the waste containers being assayed; and 3) external containment for the waste within the structures.

The following structures are situated on the permitted unit as support structures and according to the Facility Operating Record have never stored hazardous waste:

**TA54-0365, Office Building, Formerly MTGS** - TA54-0365 formerly housed the MTGS. The MTGS was a gamma assay system prototype developed by the Permittees. The instrument was salvaged in 2007 and the trailer was converted to office space.

**TA54-0483, Source Storage Trailer** - TA54-0483 serves as a storage area for calibration sources needed by the NDA systems.

**TA54-1059, Storage Trailer** - TA54-1059 has been used to store miscellaneous NDA equipment, such as container turn-tables and equipment stands.

The permitted unit has been used for the storage of mixed waste in solid form with small quantities of liquid form waste since 2004. The hazardous waste stored at the permitted unit has been: solidified inorganic solids; leached process residues; salts and cement paste; ash; dewatered aqueous sludge; chemical treatment sludge; soils; combustible debris (*e.g.*, plastics, rubber, laboratory trash, building debris); and heterogeneous debris.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include additional information about waste management procedures and hazardous waste constituents stored at the permitted unit.

### **3.0 ESTIMATE OF MAXIMUM WASTE STORED**

Approximately 800,000 gallons of hazardous waste has been stored at the permitted unit to date. Throughout the life of this Permit, it is estimated that an additional 1,375,000 gallons of hazardous waste will be stored at the permitted unit.

## 4.0 GENERAL CLOSURE REQUIREMENTS

### 4.1 Closure Performance Standard

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I.

Closure of the permitted unit will be deemed complete when: 1) all structures and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

### 4.2 Closure Schedule

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.11-1 in this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR § 264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate structures and related equipment.

Soil sampling and decontamination verification sampling activities will be conducted to demonstrate that soils, surfaces, structures, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Part 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated equipment associated with the permitted unit; verification that the closure performance standards have been achieved; and submittal of a final closure certification report. The following sections describe the procedures to be used for closure of the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous wastes will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport from the permitted unit. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous waste will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any finding(s) or action(s) that may influence closure activities or additional sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed in accordance with Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of any spills or chronic conditions identified in the Operating and Inspection Records).

### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspection of the floors, walls, and ceilings of the RTR2, the LANL HENC, the MCS HENC, the SuperHENC, the storage trailers (545 & 546), and the asphalt pad for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (*see* Section 6.0 in this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

### **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents will be removed from the permitted unit. The permitted unit's structures and related equipment will be decontaminated, removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*), Permit Section 9.4.5, and Facility waste management procedures. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous constituents from the permitted unit to meet the closure performance standards outlined in Permit Section 9.2.

#### **5.3.1 Removal of Structures and Related Equipment**

All structures and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

The asphalt pad, the materials associated with the asphalt pad (curbing and ramps), and a minimum of six inches of the base course and soil underlying the asphalt pad shall be removed after the assessment. If after the removal of the pad (and underlying soil and base course material) the remaining surface shows evidence that the removal to that point has not gathered all appropriate soils and materials associated with the pad, additional soil and materials will be removed. The Permittees shall take precautions to not remove or disturb the soil or tuff that overlies the regulated unit (covered under the March 1, 2005 Compliance Order on Consent (Order) (*see* Permit Section 9.3)) beneath the permitted unit. The option of removing small areas of asphalt at sampling locations where contamination is suspected (*i.e.*, spill or staining sites) to allow sampling without disturbing the surrounding area prior to the general removal of the pad will be assessed at the time of the assessment.

#### **5.3.2 Decontamination of Structures and Related Equipment**

All structures and related equipment that will be reused by the Facility will be decontaminated (*see* Table G.11-6) in accordance with Permit Section 9.4.3.1. This includes the RTR2, the LANL HENC, the MCS HENC, the SuperHENC, and the two storage trailers (545 & 546). This list of equipment requiring decontamination will be revised, as appropriate, during the review and assessment.

Equipment and operating machinery that is not sensitive to water intrusion, such as the transportainers (that are used only for the storage of hazardous waste) and the storage cabinets, will be decontaminated in their entirety by steam cleaning or pressure washing with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water mixed in accordance with the manufacturer's recommendations. All other

equipment at the permitted unit that is sensitive to water intrusion (*i.e.*, hazardous waste management areas within the trailers which are used for waste characterization, portable air monitors, electronic devices or tools, and spill cleanup equipment containers) will be decontaminated by washing using a wipe-down method with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water mixed in accordance with the manufacturer's recommendations.

The quantity of the wash solution will be minimized by dispensing from buckets, spray bottles, or other types of containers. Cloths, or other absorbent cleaning devices, will not be reused to wipe down the equipment after being wetted in the wash solution or after spraying solution onto the equipment.

Portable berms, or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

#### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.11-2 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

### **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, quality assurance and quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

#### **6.1 Soil Sampling and Decontamination Verification Wipe Sampling Activities**

Soils sampling and decontamination verification wipe sampling activities will be conducted at the permitted unit in order to verify that soils, structures, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from each wall, floor, and ceiling of the RTR2, the LANL HENC, the MCS HENC, the SuperHENC, and the two storage trailers (545 and 546) for a total of 36 samples. The locations of these sample collection points will be determined randomly within the area of each surface. Sample collection will be particularly biased to target areas beneath any waste management equipment such as turntables or conveyors.

In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of soil samples in the following locations:

- a. one sample at the loading and unloading areas (sample locations 3, 4, 5, 6, 7, 8, 9, 10, and 11 as illustrated on Figure G.11-1) of each of the aforementioned structures for a total of nine samples (*see* Permit Section 9.4.7.1.ii(1));

- b. one soil sample every 900 square feet of the permitted unit for a total of 100 samples (*see* Permit Section 9.4.7.1.ii(2));
- c. eight samples along the swale between the permitted unit and Pad 9 (*see* Permit Section 9.4.7.1.ii(8));
- d. one sample just off the south-east edge of the permitted unit where stormwater is directed across the pad by the south and eastward slope, is collected by trench drains southeast of the pad, and discharges from that system to a drain ('sample location 1' on Figure G.11-1). The soil sample will be collected from the point at which the water contacts soil beneath the drain (*see* permit section 9.4.7.1.ii(3)); and
- e. one sample at the rock check dam ('sample location 2' on Figure G.11-1) at the far south-east end of Area G where stormwater discharges (*see* Permit Section 9.4.7.1.ii(3)).

At the time of sampling, the precise locations of the samples will be randomly selected within each 900 square foot sampling box (*see* Figure G.11-1). These locations will be determined by applying a sub-grid of potential sampling points and randomly choosing one. If the review or assessment determines the need to obtain additional samples collected within the area of the sampling box (*e.g.*, at asphalt cracks), these sample locations will be in addition to the grid sample locations.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with the Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporate guidance from the United States EPA (EPA, 1986 and EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on structures and equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.2 Soil and Sediment Sampling**

Soil and sediment samples will be collected and analyzed to determine if hazardous constituents are present in soils at the permitted unit. Soil samples will be collected using a spade, scoop, auger, trowel, or other equipment as specified in approved methods for the type of analytes (*i.e.*, EPA 1996 or 2002) and from the appropriate depths as directed in Permit Section 9.4.7.1.ii. Samples will be kept at their at-depth temperature or lower, protected from ultraviolet light, sealed tightly in the recommended container, and analyzed within the specific holding times listed in Table G.11-4.



### **6.2.3 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

## **6.3 Sample Management Procedures**

The following provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until the samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed original chain-of-custody form to the Facility and it will become a part of the permanent sampling record documenting the sampling effort.

#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;

- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

#### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.11-4 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

#### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility

documents establish these requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, waste, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization, unless the shipper is specifically authorized through formal documentation by that organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all the hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.11-3. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.11-3. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2. This analytical laboratory will have:

- a. a documented comprehensive QA/ QC program;
- b. technical analytical expertise;
- c. a document control and records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.11-3 was based on the following considerations:

- e. the physical form of the waste;
- f. constituents of concern;
- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods” (*SW-846*) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contamination associated with the sampling

and analysis process and is described in the following sections, along with information on calculations necessary to evaluate the QC results.

#### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.11-5 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

#### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units; transfer of data between recording media; and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample
- b. the physical form of the waste;
- c. results from QC samples such as blanks, spikes, and calibrations;
- d. reference to standard methods or a detailed description of analytical procedures; and
- e. raw data printouts for comparison with summaries.

The laboratory will describe the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

### **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials; these wastes are listed with potential disposal options in Table G.11-2 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water

solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.11-6, will be containerized and managed as waste.

## **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## **9.0 REFERENCES**

- DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.
- EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.
- EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, D.C.
- LANL, 1999. "Screening Level Ecological Risk Assessment Methods," LA-UR-99-1406, Los Alamos National Laboratory, Los Alamos, New Mexico.
- NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.
- NMED, 2006. "Technical Background Document for Development of Soil Screening Levels," Rev. 4.0, June 2006, New Mexico Environment Department, Santa Fe, New Mexico.

**Table G.11-1**

**Closure Schedule for the Technical Area 54, Area G, Pad 10 Outdoor Container Storage Unit**

<b>Activity</b>	<b>Maximum Time Required</b>
Notify the Department of intent to close.	-45 days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.11-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

Potential Waste Materials	Waste Types	Disposal Options
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded waste management equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Sampling equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.



Potential Waste Materials	Waste Types	Disposal Options
Asphalt	Non-regulated solid waste	Subtitle D landfill or potentially, as included in corrective action activities at Area G.
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.

**Table G.11-3**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
Metal Analysis				
Antimony	6010, 7010	ICP-AES, GFAA	20 ug/L	Determine the metal concentration in the samples.
Arsenic	6010, 7010, 7061A	ICP-AES, GFAA, CVAA	10 ug/L	
Barium	6010, 7010	ICP-AES,GFAA	200 ug/L	
Beryllium	6010, 7010	ICP-AES, GFAA	0.2 ug/L	
Cadmium	6010, 7010	ICP-AES, GFAA	2 ug/L	
Chromium	6010, 7010	ICP-AES, GFAA	10 ug/L	
Cobalt	6010, 7010	ICP-AES, GFAA	5 ug/L	
Copper	6010, 7010	ICP-AES, GFAA	5 ug/L	
Lead	6010, 7010	ICP-AES, GFAA	5 ug/L	
Mercury	6010, 7470A, 7471B	ICP-AES, CVAA	0.2 ug/L	
Selenium	6010, 7010, 7741A	ICP-AES, GFAA, CVAA	5 ug/L	
Silver	6010, 7010	ICP-AES, GFAA	10 ug/L	
Thallium	6010, 7010	ICP-AES, GFAA	30 ug/L	
Vanadium	6010, 7010	ICP-AES, GFAA	5 ug/L	
Zinc	6010, 7010	ICP-AES, GFAA	1 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.

compounds (TIC)				
Target compound list SVOCs plus 20 TICs	8270D, 8275	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.
<b><i>Other Parameters</i></b>				
Cyanide	9010, 9012	Colorimetric	20 ug/L	Determine cyanide concentration

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

CVAA = Cold-vapor atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy

GC/MS = Gas chromatography/mass spectrometry

GFAA = Graphite furnace atomic absorption spectroscopy

ICP-AES = Inductively coupled plasma-atomic emission spectrometry

mg/L = milligrams per liter

**Table G.11-4**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide-Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4°C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
Total Mercury	Aqueous Media:  500-mL Wide-Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Solid Media:  Cool to 4°C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	
Semi-Volatile Organic Compounds			

Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to extraction. 40 days from extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4°C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HNO<sub>3</sub> = nitric acid

HCl = hydrochloric acid

L = Liter

mL = milliliter

TCLP = Toxicity Characteristic Leaching Procedure

**Table G.11-5**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

<b>QC Sample Type</b>	<b>Applicable Analysis <sup>a</sup></b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (e.g., methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.

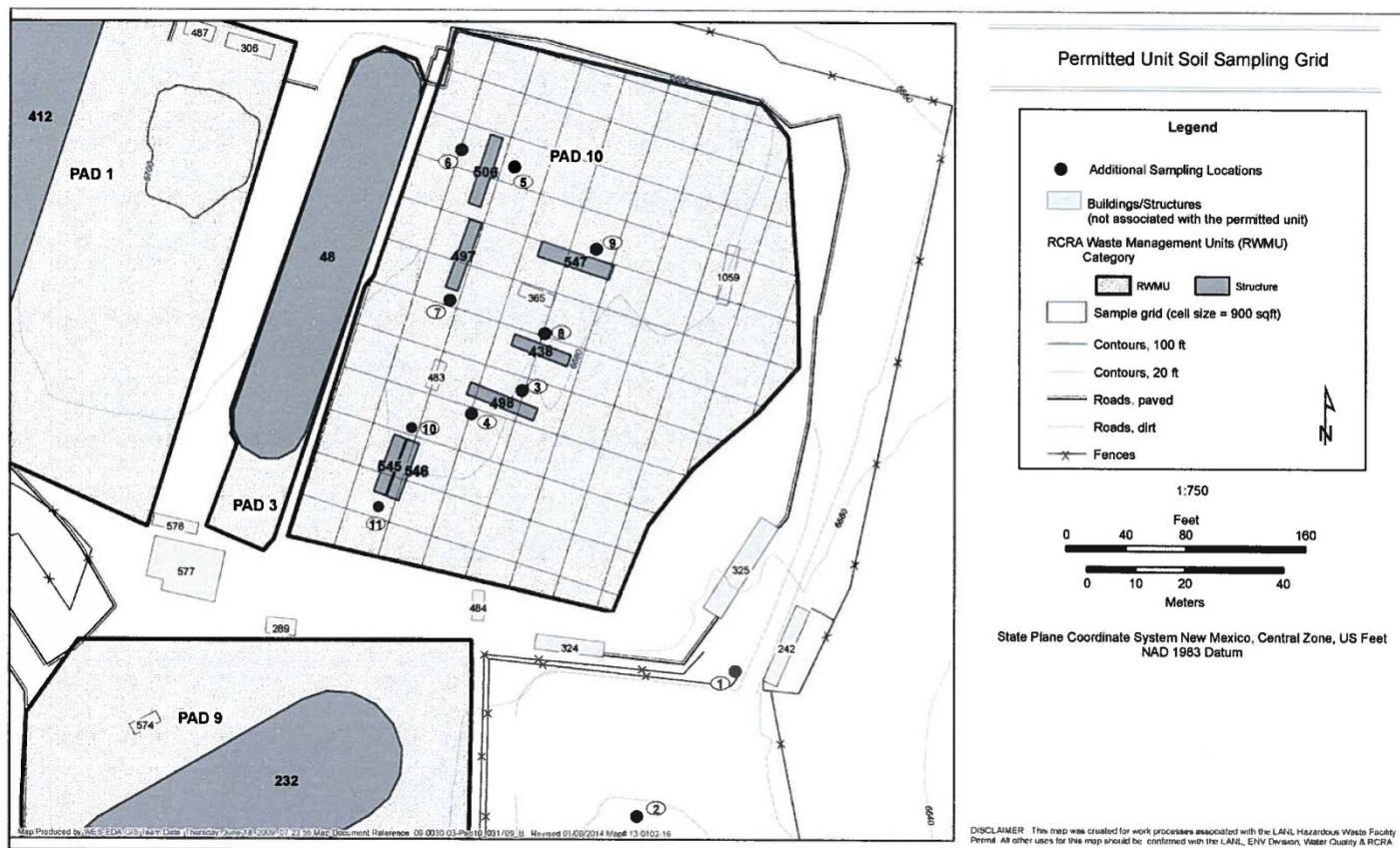
**Table G.11-6**

**List of Equipment at the Technical Area 54, Area G, Pad 10 Outdoor Container Storage Unit**

<b>Equipment</b>	<b>Decontamination</b>	<b>Disposal</b>
Characterization trailer waste staging equipment (turntables, conveyors)	X	
Any storage structures on Pad 10	X	
Equipment and cabinets	X	X
Container pallets	X	X
Communication equipment	X	X
Access barriers and chains	X	X
Electrical support infrastructure		X







**Figure G.11-1: Technical Area 54, Area G, Pad 10 Outdoor Container Storage Unit Sampling Grid and Additional Sampling Locations**

**ATTACHMENT G.12**  
**TECHNICAL AREA 54, AREA G, PAD 11**  
**OUTDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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<u>FIGURE NO.</u>	<u>TITLE</u>
G.12-1	Technical Area 54, Area G, Pad 11 Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations

## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at Technical Area (TA)-54, Area G, Pad 11 at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions to the plan, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located the permitted unit and not discussed within the Permit are described below.

The permitted unit, which was constructed in 1998, is located in the western portion of Area G and consists of an asphalt pad that measures 478 feet long and 137 feet wide or approximately 65,500 square feet. It consists of four inches of asphalt built over underlying base course which overlies a minimum of six inches of tuff fill. It also has a dome (Dome 375) and a Real-Time Radiography (RTR) system #1 situated on it. Hazardous waste is stored only in the Dome 375.

The permitted unit is sloped from 1% to 2% to the south/southeast for drainage and has curbing on the south and east sides as well. Drainage is directed to a series of four 5 inch-wide by 27 foot-long drains, all connected to two underground 8-inch diameter polyvinyl chloride pipes which discharge to a concrete lined ditch located near the southeast corner of the pad.

The permitted unit stores hazardous waste in both liquid and solid form in Dome 375. The dome, which is an aluminum framework of trusses covered with tension-fitted ultraviolet resistant, fire-retardant coated, polyester fabric, is 300 feet long by 100 feet wide and covers a surface area of approximately 30,000 square feet. It is anchored with anchor bolts to the interior concrete ring wall and is equipped with two double-panel rolling doors, one at the east end of the dome and the other on the west end. It also has 14 personnel doors located approximately every 31 to 57 feet along the dome's length. These doors allow for adequate access both by vehicles and by personnel. The interior perimeter of the dome is surrounded by a concrete ring wall, which helps prevent run-on into and runoff from the dome. Asphalt ramps located at the vehicle entrances allow vehicles and container handling equipment to pass safely over the curb. Dome 375 contains a modular panel containment structure (approximately 120 feet long x 60 feet wide) used for size reduction, decontamination, segregation, waste assay, reclassification activities, and repackaging of transuranic waste prior to shipment offsite. Two structures (124B and 124 C) are connected to the modular panel containment structure. The external dimensions of the structures are approximately 20 feet long, 8 feet wide and 8.5 feet high. The structures are refrigeration units, electrically driven, and are constructed of stainless steel internal and external panels. The structures are connected to the roll-up door opening for the modular containment structure, with the doors for each of the units facing into the modular containment structure.

Dome 375 also contains four structures that serve as an office area, a control area, and rooms for donning and doffing anti-contamination clothing. These structures are support structures and will not be used to store hazardous waste.

The RTR1 is designed to provide X-ray examination of the contents of a waste drum. The unit, RTR1, has been located on Pad 11 in support of the transuranic waste characterization operations.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*), include information about waste management procedures and hazardous waste constituents stored at the permitted unit.

### **3.0 ESTIMATE OF MAXIMUM WASTE STORED**

To date, no hazardous waste has been stored at the permitted unit. The estimated volume for the maximum inventory of waste managed over the projected lifespan of the permitted unit is 1,501,000 gallons.

## **4.0 GENERAL CLOSURE REQUIREMENTS**

### **4.1 Closure Performance Standard**

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I.

Closure of the permitted unit will be deemed complete when: 1) all structures, surfaces, and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.



## 4.2 Closure Schedule

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.12-1 in this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR § 264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Soil sampling and decontamination verification sampling activities will be conducted to demonstrate that the soils, surfaces, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## 5.0 CLOSURE PROCEDURES

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated equipment associated with the permitted unit; verification that the closure performance standards have been achieved; and submittal of a final closure certification report. The following sections describe the procedures to be used for closure of the permitted unit.

### 5.1 Removal of Waste

In accordance with Permit Section 9.4.2, all stored hazardous waste will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport from the permitted unit. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### 5.2 Records Review and Structural Assessment

After waste removal and before starting decontamination and sampling activities, the Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any finding(s) or action(s) that may influence closure activities or additional sampling locations.

### **5.2.1 Records Review**

The Operating and Inspection Records shall be reviewed as outlined in Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of any spills or chronic conditions identified in the Operating and Inspection Records).

### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspection of the floors, walls, and ceilings of the RTR1 and the modular containment structure, as well as inspecting the asphalt pad for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

## **5.3 Decontamination and Removal of Equipment and Structures**

In accordance with procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents will be removed from the permitted unit. The permitted unit's structures and related equipment will be decontaminated, removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*) and Facility waste management procedures. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous constituents from the permitted unit to meet the closure performance standards outlined in Permit Section 9.2.

### **5.3.1 Removal of Structures and Related Equipment**

All structures and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

The modular containment structure and the tensioned-fabric membranes on the dome structure, the aluminum beams, trusses, and ancillary equipment supporting the dome will be removed before the assessment. The asphalt pad, the materials associated with the asphalt pad (curbing and ramps), and a minimum of six inches of the base course and soil underlying the asphalt pad will be removed after the assessment. If after the removal of the pad (and underlying soil and base course material) the remaining surface shows evidence that the removal to that point has not gathered all appropriate soils and materials associated with the pad, additional soil and materials will be removed. If it is determined to be appropriate at the time of the assessment, soil samples may be collected through the asphalt (before the pad and its materials have been removed) from areas where contamination is suspected (*i.e.*, locations of stains or known spills).

In the event that alternative closure requirements, in accordance Permit Section 9.2.2.2, are applied to the closure of this permitted unit, the Permittees shall take precautions to not remove or disturb the soil or tuff that overlies the regulated unit (covered under the March 1, 2005 Compliance Order on Consent (Order) (*see* Permit Section 9.3)) beneath the permitted unit.

### 5.3.2 Decontamination of Structures and Related Equipment

The RTR1, as well as equipment and operating machinery that is not sensitive to water intrusion, such as the equipment cabinets, will be decontaminated by steam cleaning using water or pressure washing with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water. Other equipment that is sensitive to water intrusion such as the portable air monitors, electronic devices and tools, and spill cleanup equipment containers in the dome, will be cleaned with a wipe-down wash with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water. Table G.12-8 in this closure plan lists the equipment needing decontamination. This list will be revised during the review and assessment as necessary.

The quantity of the wash solution will be minimized by dispensing from buckets, spray bottles, or other types of containers. Cloths, or other absorbent cleaning devices, will not be reused to wipe down the equipment after being wetted in the wash solution or after spraying solution onto the equipment. Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

### 5.4 Equipment Used During Decontamination Activities

Reusable protective clothing, tools, and equipment used during closure activities will be cleaned with a wash water solution. Residue, disposable equipment, and equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.12-3 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

## 6.0 SAMPLING AND ANALYSIS PLAN

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance and quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

### 6.1 Soil Sampling and Decontamination Verification Sampling Activities

Soil samples and decontamination verification sampling activities will be conducted at the permitted unit in order to verify that soils and equipment at the permitted meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment related to the permitted unit. In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of soil samples from the following locations:

- a. one sample at the loading zone area (*see* Permit Section 9.4.7.1.ii(1));
- b. one sample every 900 square feet of the permitted unit for a total of 80 samples (*see* Permit Section 9.4.7.1.ii(2));
- c. one sample at the discharge points (in the concrete-lined ditch) of the two 80 foot long underground pipes that collect run-off at Pad 11 for a total of four samples (*see* Permit Section 9.4.7.1.ii(4)); and
- d. one sample at all joints and intersections of the two 80 foot long underground pipes that collect run-off at Pad 11 for a total of 16 samples (*see* Permit Section 9.4.7.1.ii(7)).

Figure G.12-1 illustrates these proposed soil sampling locations.

If liquid is present in any of the drains or piping at the time of the assessment, liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

At the time of sampling, the precise locations of the grid sample will be randomly selected within each 900 square foot sampling box (*see* Figure G.12-1). These locations will be determined by applying a sub-grid of potential sampling points and randomly choosing one. If the review or assessment determines the need to obtain additional samples within the area of the sampling box (*e.g.*, at asphalt cracks), these sample locations will be in addition to the grid sample locations.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with the Permit Section 9.4.7.1 and procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 1986 and EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Liquid Sampling**

Liquid samples will be collected and analyzed to determine if residual hazardous constituents remain in the drains or piping at the permitted unit. Liquid sampling will be conducted using glass or plastic tubes, a composite liquid waste sampler, a bacon bomb, a bailer, or by pouring liquid into sample containers.

### **6.2.2 Wipe Sampling**

Surface wipe samples will be collected and analyzed used to determine if residual hazardous constituents remain on surfaces, structures, or equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.3 Soil Sampling**

Soil samples will be collected and analyzed to determine if hazardous constituents are present in soils at or in the vicinity of the permitted unit. Soil samples will be collected using a spade, scoop, auger, trowel, or other equipment as specified in approved methods for the type of analyte (*i.e.*, EPA 1996 or 2002) and from the appropriate depths as directed in Permit Section 9.4.7.1.ii. Samples will be kept at their at-depth temperature or lower, protected from ultraviolet light, sealed tightly in the recommended container, and analyzed within the specific holding times listed in Table G.12-4.

### **6.2.4 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to

prevent cross contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

### **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

#### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

##### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until the samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed chain-of-custody form to the Facility and it will become a part of the permanent record documenting the sampling effort.

##### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.12-4 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish these requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, waste, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization, unless the shipper is specifically authorized through formal documentation by that organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all hazardous constituents listed in 40 CFR Part 261 Appendix VIII and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.12-3. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.12-3. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

#### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2. The analytical laboratory will have:

- a. a documented comprehensive QA/ QC program;,
- b. technical analytical expertise,
- c. a document control and records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.12-5 was based on the following considerations:

- e. the physical form of the waste;
- f. constituents of concern;
- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

#### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods” (SW-846) (EPA, 1986), or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample constituents associated with the sampling and analysis process and are described in the following sections, along with information on calculations necessary to evaluate the QC results.

##### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.12-7 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

##### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

### **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials: these wastes are listed with potential disposal options in Table G.12-2 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.12-2, will be containerized and managed as waste.

### **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

### **9.0 REFERENCES**

DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.

EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.

EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, D.C.

LANL, 1999. "Screening Level Ecological Risk Assessment Methods," LA-UR-99-1406, Los Alamos National Laboratory, Los Alamos, New Mexico.

NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.

NMED, 2006. "Technical Background Document for Development of Soil Screening Levels," Rev. 4.0, June 2006, New Mexico Environment Department, Santa Fe, New Mexico.



**Table G.12-1**

**Closure Schedule for the Technical Area 54, Area G, Pad 11 Outdoor Container Storage Unit**

<b>Activity</b>	<b>Maximum Time Required</b>
Notify the Department of intent to close.	-45 days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.12-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

**Table G.12-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded waste management equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Sampling equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.

**Table G.12-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Dome structures	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Asphalt	Non-regulated solid waste	Subtitle D landfill or potentially, as included in corrective action activities at Area G.
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.

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**Table G.12-3**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
Metal Analysis				
Antimony	6010, 7010	ICP-AES, GFAA	20 ug/L	Determine the metal concentration in the samples.
Arsenic	6010, 7010, 7061A	ICP-AES, GFAA, CVAA	10 ug/L	
Barium	6010, 7010	ICP-AES,GFAA	200 ug/L	
Beryllium	6010, 7010	ICP-AES, GFAA	0.2 ug/L	
Cadmium	6010, 7010	ICP-AES, GFAA	2 ug/L	
Chromium	6010, 7010	ICP-AES, GFAA	10 ug/L	
Cobalt	6010, 7010	ICP-AES, GFAA	5 ug/L	
Copper	6010, 7010	ICP-AES, GFAA	5 ug/L	
Lead	6010, 7010	ICP-AES, GFAA	5 ug/L	
Mercury	6010, 7470A, 7471B	ICP-AES, CVAA	0.2 ug/L	
Selenium	6010, 7010, 7741A	ICP-AES, GFAA, CVAA	5 ug/L	
Silver	6010, 7010	ICP-AES, GFAA	10 ug/L	
Thallium	6010, 7010	ICP-AES, GFAA	30 ug/L	
Vanadium	6010, 7010	ICP-AES, GFAA	5 ug/L	
Zinc	6010, 7010	ICP-AES, GFAA	1 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.

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Target compound list SVOCs plus 20 TICs	8270D, 8275	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.
<b><i>Other Parameters</i></b>				
Cyanide	9010, 9012	Colorimetric	20 ug/L	Determine cyanide concentration

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

CVAA = Cold-vapor atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy

GC/MS = Gas chromatography/mass spectrometry

GFAA = Graphite furnace atomic absorption spectroscopy

ICP-AES = Inductively coupled plasma-atomic emission spectrometry

mg/L = milligrams per liter

ug/L = micrograms per liter.

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**Table G.12-4**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide-Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4°C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
Total Mercury	Aqueous Media:  500-mL Wide-Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Solid Media:  Cool to 4°C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	
Semi-Volatile Organic Compounds			

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Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to extraction. 40 days from extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4°C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HNO<sub>3</sub> = nitric acid

HCl = hydrochloric acid

L = Liter

mL = milliliter

TCLP = Toxicity Characteristic Leaching Procedure



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**Table G.12-5**  
**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

QC Sample Type	Applicable Analysis <sup>a</sup>	Frequency	Acceptance Criteria
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (e.g., methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.

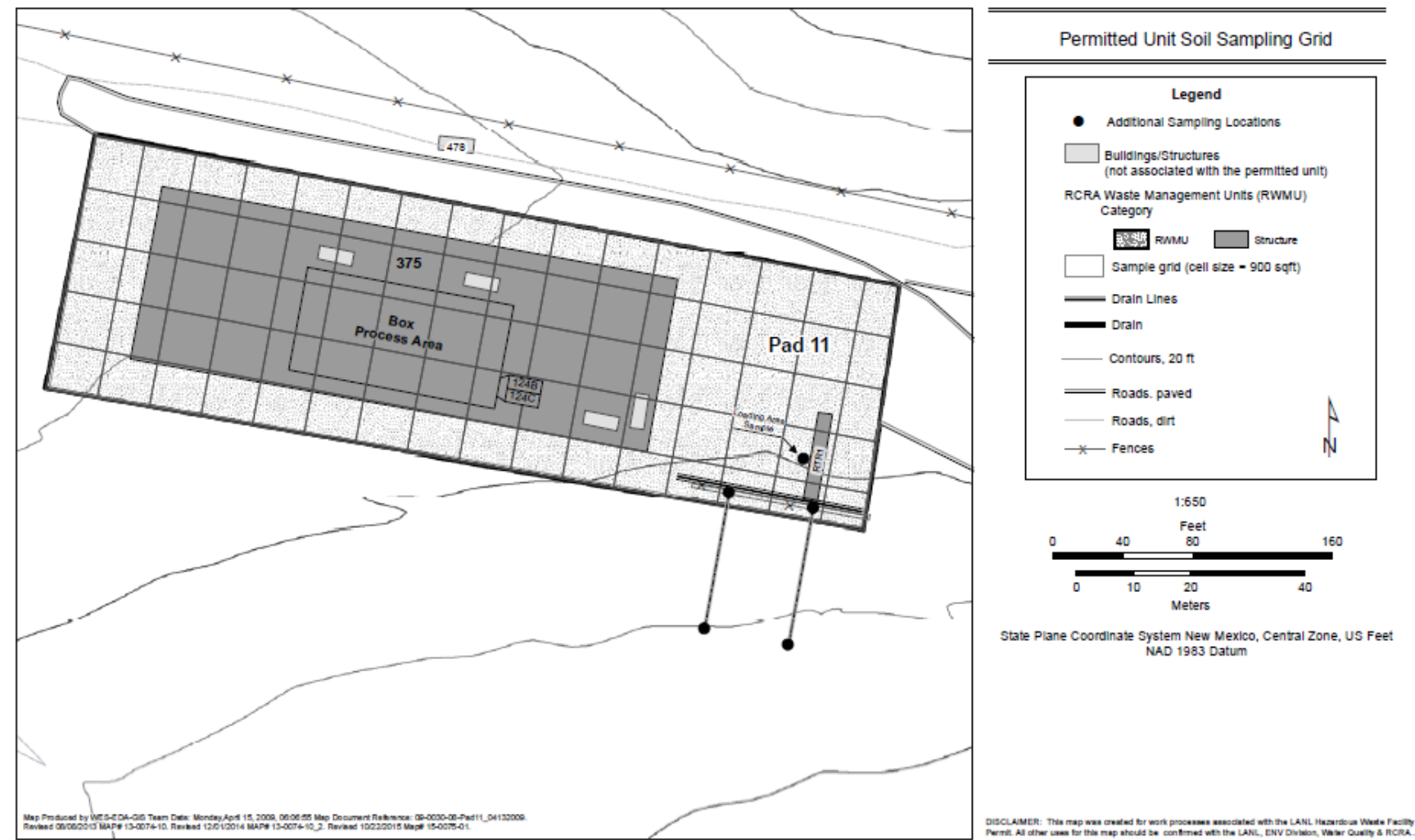
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**Table G.12-6**

**List of Equipment at the Technical Area 54, Area G, Pad 11 Outdoor Container Storage Unit**

<b>Equipment</b>	<b>Decontamination</b>	<b>Disposal</b>
Equipment and spill kit cabinets	X	X
Container pallets	X	X
Communication equipment	X	X
Access barriers and chains	X	X

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Attachment G.12 - TA-54 Area G Pad 11 Outdoor Closure Plan

**Figure G.12-1:** Technical Area 54, Area G, Pad 11 Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations

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**ATTACHMENT G.13**  
**TECHNICAL AREA 54, AREA G, STORAGE SHED 8**  
**INDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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G.13-1	Technical Area 54, Area G, Storage Shed 8, Indoor Container Storage Unit Dimension and Sump Sampling Location

## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the indoor hazardous waste container storage unit called Storage Shed 8 which is located at Technical Area 54 (TA-54-8) Area G at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9, the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The permitted unit is a steel-framed building with a concrete floor located on the north-central side of Technical Area 54, Area G which sits on a concrete supporting pad. It is rectangular-shaped and measures 40 feet (ft) by 16 ft, or approximately 640 square ft. The permitted unit is completely enclosed except for two garage-type, roll-up metal doors and a personnel door on the south wall. Along the inside perimeter of the permitted unit is a 2 inch (in)-high metal barrier on the floor along the west, north, and east walls and a rounded concrete barrier along the south wall. Centered between the two roll-up doors and 6 inches from the south wall is a sump in the floor with a wire mesh covering which measures 27.5 square inches. In the northwest inside corner of the permitted unit is a 6 in high by 6 in wide concrete barrier enclosing a rectangular area that measures 15 ft 5 in by 5 ft 11 in. This area contains a cabinet labeled "Lead-Acid Batteries for Recycle" which has batteries to be recycled as well as fire extinguishers in it.

The waste typically stored at the permitted unit includes mixed waste in solid and liquid form. The permitted unit was constructed in 1979 and has been subject to hazardous waste management regulations under RCRA since July 25, 1990. Specific hazardous waste constituents that have been stored at the permitted unit are included in Table G.13-1 of this closure plan. Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information regarding waste management procedures and hazardous waste constituents stored at the permitted unit.

## 3.0 ESTIMATE OF MAXIMUM WASTE STORED

Approximately 57,000 gallons of waste has been stored in the permitted unit. Throughout the life of this Permit it is estimated that a total of 71,300 gallons of waste will be stored in the permitted unit.

## 4.0 GENERAL CLOSURE REQUIREMENTS

### 4.1 Closure Performance Standard

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264, Subparts G and I for container storage units.

Closure of the permitted unit will be deemed complete when: 1) all surfaces and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

### 4.2 Closure Schedule

This closure plan is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table 13-2 in this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 § CFR 264.112(d)(1)) and closure activities will begin according to the requirements of 40 § CFR 264.112(d)(2)). However, pursuant to 40 CFR §264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Soil sampling and decontamination verification sampling activities will be conducted to demonstrate that surfaces, related equipment, and soils at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Part 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated structures and equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe closure activities applicable to the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous wastes will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and a structural assessment will be conducted to determine any previous finding(s) or action(s) that may influence closure activities or potential sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed in accordance with Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of spills or chronic conditions identified in the Operating and Inspection Records).

### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the floor and walls of the permitted unit for any existing conditions that indicate a potential for release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

### **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with Permit Section 9.4.3, the unit's surfaces and related equipment will be decontaminated, or removed, or both and managed according to Section 7.0 of this closure plan. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous constituents from the permitted unit to meet the closure performance standards.

All surfaces and related equipment that are removed and not intended for recycle will not require decontamination, will be considered solid and potentially hazardous waste when removed, and will be disposed of in accordance with Section 7.0.

#### **5.3.1 Removal of Structures and Related Equipment**

The metal walls and the metal roof will be removed before the structural assessment. The materials making up the concrete floor, the sump, the concrete supporting pad, as well as any materials associated with the concrete pad (*e.g.*, asphalt, curbing, base course) will be removed after the structural assessment.

#### **5.3.2 Decontamination of Surfaces, Structures, and Related Equipment**

At this time, there is no equipment located at the permitted unit that is expected to be left in place; however, if equipment is identified during the assessment that is expected to be left in place, it will be decontaminated.

### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during closure decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

## **6.0 SAMPLING AND ANALYSIS PLAN**

This sampling and analysis plan addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

## **6.1 Soil Sampling and Decontamination Verification Sampling Activities**

Soil sampling and decontamination verification sampling activities will be conducted at the permitted unit in order to verify that surfaces, related equipment and soils at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment.

If there is liquid found in the sump at the time of the assessment at least one liquid sample will be collected in accordance with Section 6.2.1 of this closure plan.

In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of four soil samples at the permitted unit from the following locations:

- a. immediately off the concrete pad in front of each roll-up door (*see* Permit Section 9.4.7.1.ii(1));
- b. every 900 square feet beneath the permitted unit after it, and the concrete pad, are removed (*see* Permit Section 9.4.7.1.ii(2)); and
- c. one sample directly beneath the location of where the sump was located (*see* Permit Section 9.4.7.1.ii(5)).

These sample locations are illustrated in Figures G.13-1 and G.13-2.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with Permit Section 9.4.7.1 and the procedures identified in this sampling and analysis plan which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Liquid Sampling**

Liquid samples will be collected and analyzed to determine if residual hazardous constituents remain in the sump at the permitted unit. Liquid samples will be collected using glass or plastic tubes, a composite liquid waste sampler, a bacon bomb, a bailer, or by pouring liquid into sample containers.

### **6.2.2 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on surfaces and related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods*, (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification

sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.3 Soil sampling**

Soil samples will be collected and analyzed to determine if hazardous constituents are present in soils at the permitted unit. Soil samples will be collected using a spade, scoop, auger, trowel, or other equipment as specified in approved methods for the type of analyte (*i.e.*, EPA 1996 or 2002) and from the appropriate depths as directed in Permit Section 9.4.7.1.ii. Samples will be kept at their at-depth temperature or lower, protected from ultraviolet light, sealed tightly in the recommended container, and analyzed within the specific holding times listed in Table G.10-5.

### **6.2.4 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross-contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper. Residue, disposable decontamination equipment, and reusable decontamination equipment that cannot be decontaminated will be containerized and managed appropriately at an approved on-site facility.

## **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with closure.

### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form will be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed chain-of-custody form to the Facility and it will become part of the permanent sampling record documenting the sampling efforts.

#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line and the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;



- j. observations; and,
- k. name(s) of personnel responsible for the observations.

### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.13-5 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish the requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, wastes, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier; air carrier; or freight. All off-site transportation will be processed through the Facility packaging and transportation organization, unless the shipper is specifically authorized through formal documentation by the packaging and transportation organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all the hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.13-4. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.13-4. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 7.4.2. The analytical laboratory will have:

- a. a documented comprehensive QA/QC program;
- b. technical analytical expertise;
- c. a document control/records management plan; and,
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.13-4 is based on the following considerations:

- e. the physical form of the waste;
- f. constituents of interest;
- g. required detection limits (*e.g.*, regulatory thresholds); and,
- h. information requirements (*e.g.*, waste classification).

#### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods” (*SW-846*) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contamination associated with the sampling and analysis process, and is described in the following sections, along with information on calculations necessary to evaluate the QC results. QA/QC samples will be collected in accordance with the most recent and appropriate Facility sampling plan incorporating guidance from the EPA (EPA, 2002), DOE (DOE, 1995), or other Department-approved procedures.

##### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected include trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.13-6 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

##### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units; transfer of data between recording media; and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;

- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

## 7.0 WASTE MANAGEMENT

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials, which are listed with potential disposal options in Table G.13-3 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.13-3, will be containerized and managed as waste.

## 8.0 CLOSURE CERTIFICATION REPORT

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## 9.0 REFERENCES

- DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.
- EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.
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- NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.

**Table G.13-1**

**Hazardous Waste Constituents of Concern at the Technical Area 54, Area G, Storage Shed 8,  
Indoor Container Storage Unit**

<b>Category</b>	<b>EPA Hazardous Waste Numbers</b>	<b>Specific Constituents <sup>a</sup></b>
Toxic Metals	D008	Lead
Volatile Organic Compounds	F001	Trichloroethylene

<sup>a</sup> Based on the permitted unit's Operating Record

**Table G.13-2**

**Closure Schedule for the Technical Area 54, Area G, Storage Shed 8, Indoor Container Storage Unit**

<b>Activity</b>	<b>Maximum Time Required</b>
Notify the Department of intent to close.	-45 Days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.13-3**

Potential Waste Materials, Waste Types, and Disposal Options

Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.

**Table G.13-3**  
**Waste Materials, Waste Types, and Disposal Options**

Waste Materials	Waste Types	Disposal Options
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded concrete	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill, recycled, or reused
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Discarded waste management equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Sampling equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.

**Table G.13-3**  
**Waste Materials, Waste Types, and Disposal Options**

Waste Materials	Waste Types	Disposal Options
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.



**Table G.13-4**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
<b><i>Metal Analysis</i></b>				
Lead	7420 <sup>d</sup> , 7421 <sup>c</sup>	FLAA, GFAA	5 ug/L	Determine the metal concentration in the samples.
<b><i>Organic Analysis</i></b>				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," *SW-846*.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

<sup>c</sup> Method being integrated into Method 7010, per the May 1998 *SW-846* Draft Update IVA.

<sup>d</sup> Method being integrated into Method 7000B, per the May 1998 *SW-846* Draft Update IVA.

FLAA = Flame atomic absorption spectroscopy

GC/MS = Gas chromatography/mass spectrometry

GFAA = Graphite furnace atomic absorption spectroscopy

mg/L = milligrams per liter

ug/L = micrograms per liter.

**Table G.13-5**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
<i>Metals</i>			
TCLP/Total Metals: Lead	Aqueous Media:	Aqueous Media:	180 Days
	500-mL Wide Mouth-Polyethylene or Glass with Teflon Liner	HNO <sub>3</sub> to pH <2  Cool to 4 °C	
	Solid Media:	Solid Media:	
	125-mL Glass	Cool to 4 °C	
<i>Volatile Organic Compounds</i>			
Target Compound Volatile Organic Compounds	Aqueous Media:	Aqueous Media:	14 days
	Two 40-mL Amber Glass Vials with Teflon-Lined Septa	HCl to pH<2  Cool to 4 °C	
	Solid Media:	Solid Media	
	125-mL Glass or Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Cool to 4 °C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HNO<sub>3</sub> = nitric acid

HCl = hydrochloric acid

mL = milliliter

TCLP = Toxicity Characteristic Leaching Procedure

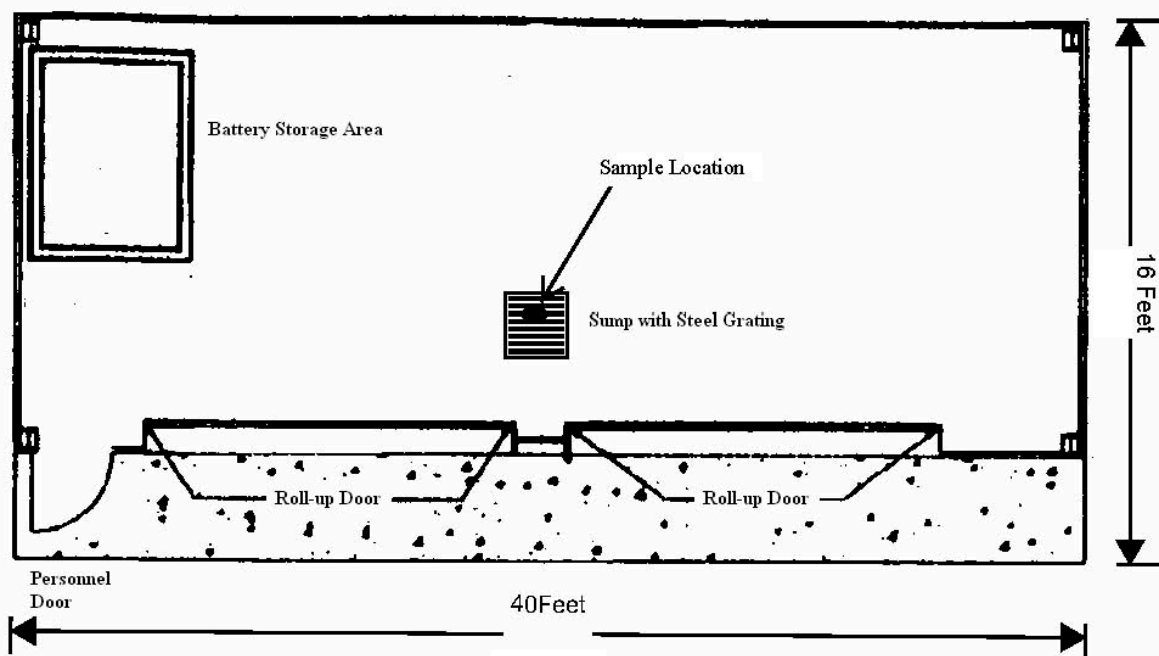
**Table G.13-6**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

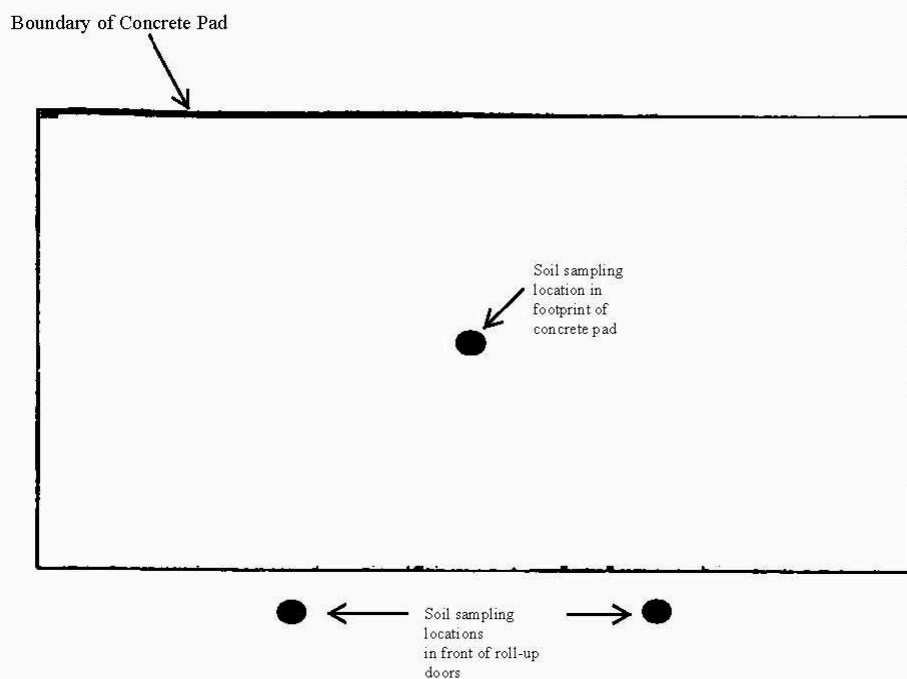
<b>QC Type</b>	<b>Sample</b>	<b>Applicable Analysis <sup>a</sup></b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Trip Blank		VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank		VOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate		Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>		VOC, metals	One sample daily	Not Applicable

<sup>a</sup> For VOC analysis, if blank shows detectable levels of any common laboratory contaminant (*e.g.*, methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used



**Figure G.13-1:** Technical Area 54, Area G, Storage Shed 8, Indoor Container Storage Unit Dimension and Sump Sampling Location



**Figure G.13-2:** Technical Area 54, Area G, Storage Shed 8, Indoor Container Storage Unit Soil Sampling Locations

**ATTACHMENT G.14**  
**TECHNICAL AREA 54, AREA G, BUILDING 33**  
**INDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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<u>FIGURE NO.</u>	<u>TITLE</u>
G.14-1	Technical Area 54, Area G, Building 33, Indoor Container Storage Unit Grid Sampling and Additional Sampling Locations

## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the indoor hazardous waste container storage unit at Technical Area (TA)-54, Area G, Building 33 (Drum Preparation Facility) at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions to the plan, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of a specific unit, this closure plan may be amended in accordance with Permit Section 9.4.8 to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The permitted unit, which is located in the north-central portion of Area G, consists of a storage dome with an attached concrete-block building (Building 33) both of which are situated on an eight inch thick concrete pad surrounded on the south central portion by an asphalt apron. The concrete pad overlies six inches of base course. The permitted unit is used for waste storage and preparation activities for transuranic and mixed transuranic waste destined for shipment to the Waste Isolation Pilot Plant for disposal.

The dome, which is 157 feet (ft) long and 50 ft wide, with a peak height of 24 ft, is built of an aluminum framework of trusses covered with tension-fitted ultraviolet resistant, fire-retardant coated, polyester fabric. The dome's aluminum frame is directly connected to Building 33, which extends approximately five ft into the dome. The concrete-block building attached to the dome is approximately 40 ft long and 34 ft wide. Two personnel doors are located in Building 33; one on the west side and one on the east side. Two overhead doors are located on the north side of the building to allow free movement of personnel and container-handling equipment between the building and the dome. The area of the dome and the building totals approximately 8,570 square ft.

The interior perimeter of the dome is surrounded with a 6-inch-high, 8-inch-wide concrete curb to prevent run-on and runoff. The concrete pad in the dome is also sloped to a 6-inch-wide centralized concrete drainage trench that is covered with 12-inch-wide steel grating. The trench slopes toward a steel sump located at the east end of the dome. The rooms in the attached building contain drains that are connected to this main drainage system. Two additional trenches located in the two storage rooms in Building 33 are perpendicular to, and drain into, the main trench. The concrete floors of these rooms also slope inward to prevent runoff.

The central drainage trench in the dome connects to a sump in the eastern end of the dome. The steel sump is located within a concrete basin and is approximately 14 ft long by 6.5 ft wide by 5 ft deep with a capacity of 3,473 gallons. A primary holding tank, associated with the sump, is located in a concrete basin that is 15 ft long by 12 ft wide by 5.5 ft deep and has a capacity of approximately 7,405 gallons. A secondary holding tank associated with the sump is located in a separate concrete basin that is 12 ft long by 12 ft wide by 5.5 ft deep and has a capacity of approximately 5,924 gallons. The basins are designed to contain any spills or leaks resulting from potential overflow or breach of the holding tanks.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information regarding waste management procedures and hazardous waste constituents stored at the permitted unit.

### **3.0 ESTIMATE OF MAXIMUM WASTE STORED**

Approximately 515,550 gallons of waste has been stored in the permitted unit. Throughout the life of this Permit it is estimated that a total of 649,500 gallons of waste will be stored in the permitted unit.

### **4.0 GENERAL CLOSURE REQUIREMENTS**

#### **4.1 Closure Performance Standard**

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I.

Closure of the permitted unit will be deemed complete when: 1) all surfaces and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent,

professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to and approved by the Department.

## **4.2 Closure Schedule**

This closure plan is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.14-1 in this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 § CFR 264.112(d)(1)) and closure activities will begin according to the requirements of 40 § CFR 264.112(d)(2)). However, pursuant to 40 CFR § 264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of a modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Soil sampling and decontamination verification sampling activities will be conducted to demonstrate that soils, surfaces, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated structures and equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe closure activities applicable to the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous wastes will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport from the permitted unit. Appropriate shipping documentation will be prepared for the wastes during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

## **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any previous finding(s) or action(s) that may influence closure activities or potential sampling locations.

### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed in accordance with Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of any spills or chronic conditions identified in the Operating and Inspection Records).

### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the floor and walls of the concrete-block room as well as the floor in the dome for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

## **5.3 Decontamination and Removal of Equipment and Structures**

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents will be removed from the permitted unit. The permitted unit's surfaces and related equipment will be decontaminated, removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*), Permit Section 9.4.5, and Facility waste management procedures. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous constituents from the permitted unit to meet the closure performance standards outlined in Permit Section 9.2.

### **5.3.1 Removal of Structures and Related Equipment**

All surfaces and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

The following structures and related equipment will be removed before the assessment: the dome; the aluminum beams, trusses, and ancillary equipment supporting the dome; and the walls and metal roof of the attached concrete-block building. The following structures and related equipment will be removed after the structural assessment: the concrete pad; any materials associated with the concrete pad (*e.g.*, concrete ringwall, sump structures, asphalt, curbing, base course, soil underlying pad); the floor of the attached building; and any surrounding asphalt.

If after the removal of the pad (and underlying soil and base course material) the remaining surface shows evidence that the removal to that point has not gathered all appropriate soils and materials associated with the pad, additional soil and materials will be removed. If it is determined to be appropriate at the time of the assessment, soil samples may be collected through the asphalt (before the pad and its materials have been removed) from areas where contamination is suspected (*i.e.*, locations of stains or known spills).

In the event that alternative closure requirements, in accordance Permit Section 9.2.2.2, are applied to the closure of this permitted unit, the Permittees shall take precautions to not remove or disturb the soil or tuff that overlies the regulated unit (covered under the March 1, 2005 Compliance Order on Consent (Order) (*see* Permit Section 9.3)) beneath the permitted unit.

### **5.3.2 Decontamination of Surfaces, Structures, and Related Equipment**

All surfaces and related equipment that will be reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. Decontamination of the permitted unit's surfaces will include all features located within the unit. This includes: the tanks; the equipment cabinets; the drum venting equipment; the portable air monitors; the electronic devices or tools; and spill cleanup equipment containers. The list of equipment requiring decontamination may be revised during the review and assessment which would result in an amendment to this closure plan.

Equipment and operating machinery that is not sensitive to water intrusion, such as the tanks and equipment cabinets, will be decontaminated by pressure washing or steam cleaning with a solution consisting of a surfactant detergent (*e.g.*, Alconox®) and water and mixed in accordance with the manufacturer's recommendation. All other equipment at the permitted unit that is sensitive to water intrusion (*i.e.*, drum venting equipment, portable air monitors, electronic devices or tools, spill cleanup equipment containers) will be decontaminated by washing using a wipe-down method with a solution consisting of a surfactant detergent (*e.g.*, Alconox®) and water mixed in accordance with the manufacturer's recommendations.

The quantity of the wash solution will be minimized by dispensing from buckets, spray bottles, or other types of containers. Cloths, or other absorbent cleaning devices, will not be reused to wipe down the equipment after being wetted in the wash solution or after spraying solution onto the equipment.

Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during closure activities will be cleaned with a wash water solution. Residue, disposable equipment, and equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.14-2 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

## **6.0 SAMPLING AND ANALYSIS PLAN**

This sampling and analysis plan addresses the specific requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

## 6.1 Soil Sampling and Decontamination Verification Sampling Activities

Soil sampling and decontamination verification sampling activities will be conducted at the permitted unit in order to verify that the soils, surfaces, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment related to the permitted unit. In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of soil samples at the permitted unit at the following locations:

- a. one sample every 900 square feet beneath the permitted unit after the pad is removed for a total of eleven samples (*see* Permit Section 9.4.7.1.ii(2));
- b. five soil samples to address stormwater runoff (*see* Permit Section 9.4.7.1.ii(3)):
  - i. one from the northwest end of the permitted unit identified as ‘sample location 1’;
  - ii. one from the north end of the permitted unit identified as ‘sample location 2’;
  - iii. one from the southeast end of the permitted unit identified as ‘sample location 3’; and
- c. two from each of the areas immediately off the concrete in front of each roll-up door identified as ‘sample location 4’ and ‘sample location 5’ (*see* Permit Section 9.4.7.1.ii(1));
- d. one sample at each of the drainage points in the concrete-block building for a total of four samples (*see* Permit Section 9.4.7.1.ii(5));
- e. one sample beneath the sump at the southeast end of the permitted unit (*see* Permit Section 9.4.7.1.ii(5));
- f. one sample at all joints and intersections of the underground drainage system (*see* Permit Section 9.4.7.1.ii(7)); and
- g. one sample every 30 ft beneath the axis of the trench that runs the length of the dome for a total of five samples (*see* Permit Section 9.4.7.1.ii(8)).

A total of 24 samples will be collected from soils beneath the permitted unit as illustrated in Figure G.14-1.

If there is liquid found in the trench drains or the dome sump at the time of the assessment, liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

At the time of sampling, the precise location of the grid samples will be randomly selected within each 900 square foot sampling box (*see* Figure G.14-1). These locations will be determined by applying a sub-grid of potential sampling points and randomly choosing one. This sampling strategy will result in a minimum of eleven samples taken from the soils beneath the permitted unit. If the review or assessment determines the need to obtain additional samples within the area of the sampling box (*e.g.*, at concrete or asphalt cracks), these sample locations will be in addition to the grid sampling locations.



## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with Permit Section 9.4.7.1 and the procedures identified in this sampling and analysis plan which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Liquid Sampling**

Liquids will be collected and analyzed to determine if residual hazardous constituents remain in the drain lines or sumps at the permitted unit. Liquid samples will be collected using glass or plastic tubes, a composite liquid waste sampler, a bacon bomb, a bailer, or by pouring liquid into sample containers.

### **6.2.2 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on the surfaces or related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample methods will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.3 Soil Sampling**

Soil samples will be collected and analyzed to determine if hazardous constituents are present in soils at the permitted unit. Samples will be collected using a spade, scoop, auger, trowel, or other equipment as specified in the approved methods for the type of analytes (*i.e.*, EPA 1996 or 2002) and from the appropriate depths as directed in Permit Section 9.4.7.1.ii. Samples will be kept at their at-depth temperature or lower, protected from ultraviolet light, sealed tightly in the recommended container, and analyzed within the specific holding times listed in Table G.14-4.

### **6.2.4 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

### **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

#### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

##### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until the samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form will be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request/chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed chain-of-custody form to the Facility and it will become a part of the permanent sampling record documenting the sampling effort.

##### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross outs must be made with a single line and the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

#### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.14-4 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

#### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish these requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, waste, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier; air carrier; or freight. All off-site transportation will be processed through the Facility packaging and transportation

organization, unless the shipper is specifically authorized through formal documentation by that organization to independently tender shipments to common motor or air carriers.

#### **6.4 Sample Analysis Requirements**

Samples will be analyzed for all the hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.14-3. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.14-3. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

##### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Permit Section 7.5.2. The analytical laboratory will have:

- a. a documented comprehensive QA/ QC program;
- b. technical analytical expertise;
- c. a document control/records management plan; and,
- d. ☐the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.14-3 was based on the following considerations:

- e. the physical form of the waste;
- f. constituents of interest;
- g. required detection limits (*e.g.*, regulatory thresholds); and,
- h. information requirements (*e.g.*, waste classification).

##### **6.4.1.1 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contaminations associated with the sampling and analysis process, and are described in the following sections, along with information on calculations necessary to evaluate the QC results.

##### **6.4.1.2 Field Quality Control**

The field QC samples that will be collected include trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.14-5 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and

submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

#### **6.4.1.3 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.2 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units; transfer of data between recording media; and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.3 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and,
- d. raw data printouts for comparison with summaries.

The laboratory will describe the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

### **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials: these wastes are listed with potential disposal options in Table G.14-2 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.14-2, will be containerized and managed as waste.

### **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the permitted unit, a final closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## 9.0 REFERENCES

DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.

EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.

EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, D.C.

LANL, 1999. "Screening Level Ecological Risk Assessment Methods," LA-UR-99-1406, Los Alamos National Laboratory, Los Alamos, New Mexico.

NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.

NMED, 2006. "Technical Background Document for Development of Soil Screening Levels," Rev. 4.0, June 2006, New Mexico Environment Department, Santa Fe, New Mexico.

**Table G.14-1**

**Closure Schedule for the Technical Area 54, Area G, Building 33, Indoor Container Storage Unit**

Activity	Maximum Time Required
Notify the Department of intent to close.	-45 days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.14-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

<b>Waste Materials</b>	<b>Waste Types</b>	<b>Disposal Options</b>
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.



<b>Waste Materials</b>	<b>Waste Types</b>	<b>Disposal Options</b>
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded waste management equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Sampling equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Dome structures	Non-regulated solid waste	Subtitle D landfill

Waste Materials	Waste Types	Disposal Options
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Asphalt	Non-regulated solid waste	Subtitle D landfill or potentially, as included in corrective action activities at Area G.
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.

**Table G.14-3**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
Metal Analysis				
Antimony	6010, 7010	ICP-AES, GFAA	20 ug/L	Determine the metal concentration in the samples.
Arsenic	6010, 7010, 7061A	ICP-AES, GFAA, CVAA	10 ug/L	
Barium	6010, 7010	ICP-AES,GFAA	200 ug/L	
Beryllium	6010, 7010	ICP-AES, GFAA	0.2 ug/L	
Cadmium	6010, 7010	ICP-AES, GFAA	2 ug/L	
Chromium	6010, 7010	ICP-AES, GFAA	10 ug/L	
Cobalt	6010, 7010	ICP-AES, GFAA	5 ug/L	
Copper	6010, 7010	ICP-AES, GFAA	5 ug/L	
Lead	6010, 7010	ICP-AES, GFAA	5 ug/L	
Mercury	6010, 7470A, 7471B	ICP-AES, CVAA	0.2 ug/L	
Selenium	6010, 7010, 7741A	ICP-AES, GFAA, CVAA	5 ug/L	
Silver	6010, 7010	ICP-AES, GFAA	10 ug/L	
Thallium	6010, 7010	ICP-AES, GFAA	30 ug/L	
Vanadium	6010, 7010	ICP-AES, GFAA	5 ug/L	
Zinc	6010, 7010	ICP-AES, GFAA	1 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.

Target compound list SVOCs plus 20 TICs	8270D, 8275	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.
<b><i>Other Parameters</i></b>				
Cyanide	9010, 9012	Colorimetric	20 ug/L	Determine cyanide concentration

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

CVAA = Cold-vapor atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy

GC/MS = Gas chromatography/mass spectrometry

GFAA = Graphite furnace atomic absorption spectroscopy

ICP-AES = Inductively coupled plasma-atomic emission spectrometry

mg/L = milligrams per liter

ug/L = micrograms per liter

**Table G.14-4**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide-Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4°C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
Total Mercury	Aqueous Media:  500-mL Wide-Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Solid Media:  Cool to 4°C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	
Semi-Volatile Organic Compounds			

Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to preparative extraction. 40 days from preparative extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4°C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods,” SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HNO<sub>3</sub> = nitric acid

HCl = hydrochloric acid

L = Liter

mL = milliliter

TCLP = Toxicity Characteristic Leaching Procedure

**Table G.14-5**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

<b>QC Sample Type</b>	<b>Applicable Analysis <sup>a</sup></b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

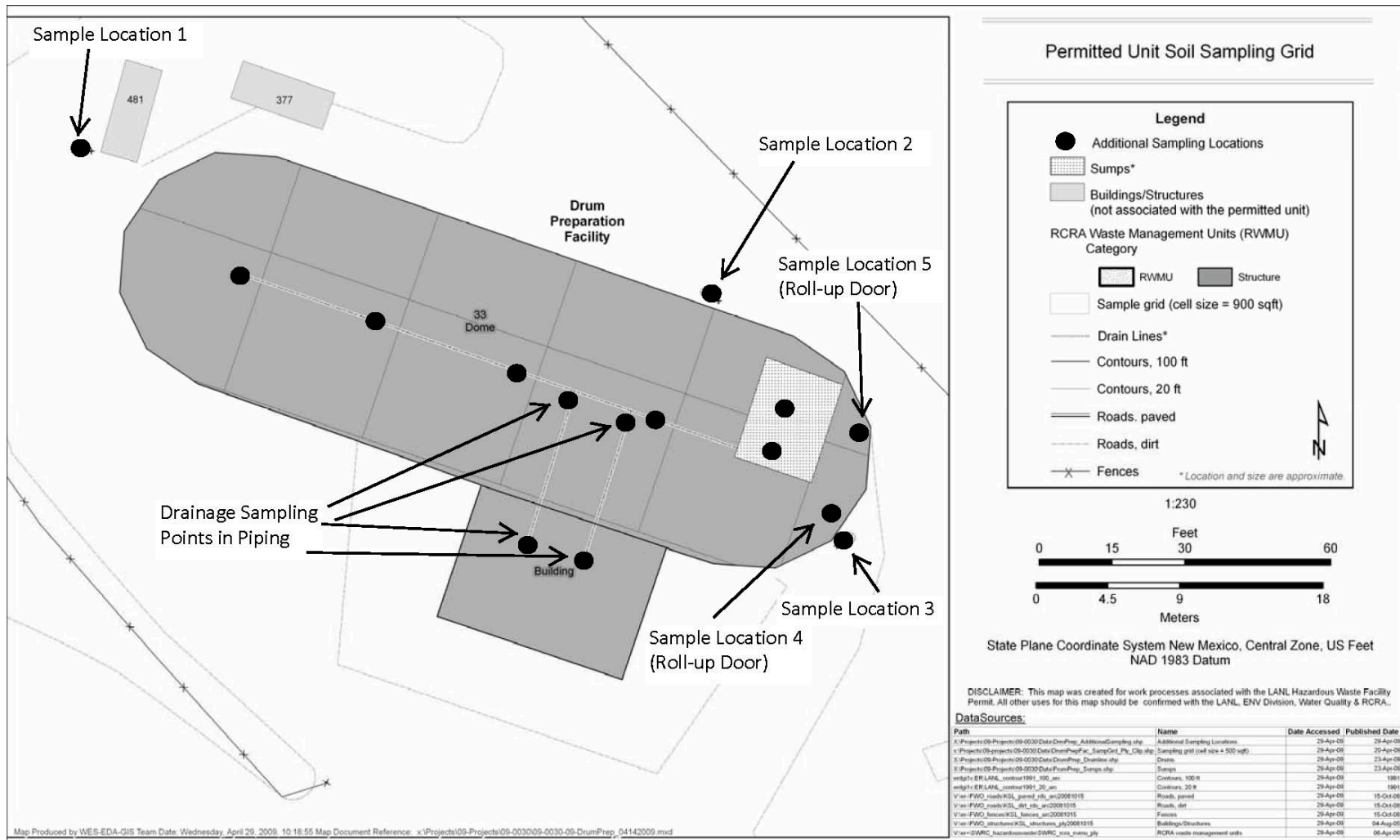
<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (*e.g.*, methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.

**Table G.14-6**  
**List of Equipment at the Technical Area 54, Area G, Building 33 Indoor Container Storage Unit**

Equipment	Decontamination	Disposal
Drum venting and associated equipment	X	X
Electrical infrastructure	X	X
Equipment and spill kit cabinets	X	X
Container pallets	X	X
Communication equipment	X	X
Access barriers and chains	X	X





**Figure G.14-1:** Technical Area 54, Area G, Building 33, Indoor Container Storage Unit Grid Sampling and Additional Sampling Locations

**ATTACHMENT G.15**  
**TECHNICAL AREA 54, AREA L**  
**OUTDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at Technical Area (TA)-54, Area L at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions to the plan, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The permitted unit consists of an approximately 110,500 square feet (ft<sup>2</sup>) asphalt pad covered area within the fence line at Area L. The permitted unit has several structures associated with it that store hazardous and mixed waste in solid and liquid form: one dome (Dome 215); three portable waste storage buildings (Storage Sheds 68, 69, and 70); one storage shed (Shed 31); one building (Building 39 and containment pad); and four covered storage pads (Pad 32, Pad 35, Pad 36, and Pad 58).

The permitted unit consists of a four to six inch-thick asphalt pad, which overlies a base course, is sloped 1 to 1.5% to facilitate drainage, and has a 6-inch-high, 8-inch-wide asphalt berm in some areas to prevent run-on and runoff.

Storage Dome 215 is 60 ft wide, 266 ft long, and 26 ft high with an area of approximately 15,960 ft<sup>2</sup>. The dome is an arch frame-supported, stressed-membrane structure of modular construction with an aluminum framework and an ultraviolet, stabilized, plasticized polyvinyl chloride fabric covering equipped with 14 personnel doors and two roll-up doors. The dome is anchored to the concrete ring wall with anchor bolts and the flooring is equipped with a six inch (in.) high by eight in. wide concrete ring wall that surrounds the perimeter of the dome. The dome also has a ramp at the dome's vehicle entrance which allows vehicles and container handling equipment to pass safely over the ring wall. Both the ring wall and the ramp prevent run-on into the dome. Any liquid that might accumulate within Dome 215 (*e.g.*, liquids resulting from fire-suppression activities) is contained within the ring-walled area. Liquid that may result from fire-suppression activities and that is in excess of the capacity inside the ring wall is collected in a double-walled holding tank connected to the eastern side of the dome by a double-walled pipe.

Canopy 216, decommissioned in March 2010, was 33 ft wide by 120 ft long with an area of approximately 3,960 ft<sup>2</sup>. The canopy consisted of a rigid aluminum frame anchored to a sloped asphalt pad which supported a tensioned membrane. All waste containers that were stored in Canopy 216, including gas cylinders, were stored on pallets or were otherwise elevated (*e.g.*, metal supports, wooden

timbers, baskets) to prevent contact with accumulated liquids. All liquid wastes were stored on secondary containment pallets.

The three portable waste storage buildings (Storage Sheds 68, 69, and 70) are steel prefabricated sheds measuring 23 ft long, nine ft wide and 8.5 ft high each with an area of approximately 128 ft<sup>2</sup>. The sheds are elevated by design to prevent run-on and are each constructed with a liquid-tight sump covered by metal grates, to ensure containment of any potential leaks or spills and to prevent runoff. Containers are placed directly on the metal grates, which prevent contact with liquids that may have accumulated in the sumps. The interior of each shed and sump is coated with chemically-resistant epoxy paint. Access to the storage compartments in each shed is obtained through three sets of double doors.

Storage Shed 31 is a prefabricated shed constructed of steel that measures approximately 14 ft long, 13 ft wide and eight ft high with an area of approximately 180 square ft. It sits on a concrete foundation that has a raised edge and is surrounded by asphalt which is sloped away from the shed to prevent run-on. The shed has three separate liquid-tight recessed sumps in the concrete foundation that are each covered with a steel grate. Containers are stored on the steel grates which prevent contact with liquids that may have accumulated in the sumps. The sumps and the concrete foundation are coated with chemically-resistant paint.

Storage Pad 32 consists of a bermed (by a 1-ft-wide, 6- to 8-inch-high concrete curb) concrete pad that is 116.5 ft long by 15.5 ft wide with an area of approximately 1800 ft<sup>2</sup>. The bermed area, which prevents run-on of storm water, is divided into six separate containment cells to segregate wastes with different hazard classes. The containment cells are separated by metal partitions above the flooring and each consists of a recessed sump covered with grate flooring on which containers are stored; this prevents contact with liquids that may have accumulated in the sumps. The concrete sumps are treated with chemical-resistant epoxy filler-sealer and protective coating which provides an impervious seal to contain any potential leaks, spills, or accumulation of precipitation. The pad is covered by a 117.75-ft-long by 25.75-ft-wide canopy which provides protection from the weather.

Storage Pad 35 consists of a concrete pad that measures 31.5 ft long by 31.5 ft wide with an area of approximately 1050 ft<sup>2</sup>. The pad has a six inch high concrete berm that prevents run-on and runoff of liquids. The bermed area has an elevated ramp on one side to allow access for equipment to move waste containers. The ramp also helps to prevent run-on of precipitation and runoff of any accumulated liquids. The concrete berms and the base of the concrete pad are treated with chemical-resistant epoxy filler-sealer and protective coating. The pad is covered by a 136 ft long by 48 ft wide canopy that provides protection from the weather.

Storage Pad 36 is a 33 ft long by 31.5 ft wide concrete pad with an area of approximately 1050 ft<sup>2</sup>. The pad is surrounded by a one foot wide berm that varies from six inches to a single foot in height. The berm prevents run-on and runoff of liquids. The berm and the base of the concrete pad are treated with chemical-resistant epoxy filler-sealer and protective coating which provides an impervious seal to contain any leaks, spills, or accumulation of precipitation. The Perma-Con®, once located on the pad, was removed and disposed. The pad is covered by a 136 ft long by 48 ft wide canopy that provides protection from the weather.

Storage Pad 58 measures 33 ft long by 31.5 ft wide with an area of approximately 1050 ft<sup>2</sup>. The pad has a foot wide berm that varies from six inches to a foot in height. The bermed area has an elevated ramp on one side to allow access for equipment to move waste containers; both the berm and the ramp provide protection from run-on and run-off of precipitation and any accumulated liquids. The berm and the base of the concrete pad are treated with chemical-resistant epoxy filler-sealer and protective coating. This



provides an impervious seal that will contain any leaks, spills, or accumulation of precipitation. Stored waste containers are elevated on pallets to prevent contact with any potential accumulated liquids. Storage Pad 58 is covered by a 136-ft-long, 48-ft-wide canopy that provides protection from the weather.

Building 39, which measures 40 ft long by 40 ft wide, is a metal panel building set on a concrete foundation with a metal canopy attached to the south side of the building. The rectangular metal canopy measures 83 ft long by 46 ft wide and covers the concrete pad on which it sits. The combined unit has a surface area of approximately 3,450 ft<sup>2</sup>. There are two areas associated with Building 39 that provide secondary containment: Room 101 (located inside Building 39); and a containment pad (located at the south end of Building 39). The 878 ft<sup>2</sup> Room 101 has a six in. high concrete curb that surrounds the room. The curb and floor are treated with chemical-resistant epoxy filler-sealer and protective coating which provides an impervious seal to contain any potential leaks, spills, or accumulation of precipitation. The containment pad, which consists of two sections, is covered by a metal canopy that provides protection from the weather. The eastern section of the containment pad is constructed of asphalt and measures 83 ft long by 23 ft wide; the western section is approximately 58 ft long by 16 ft wide and is surrounded by a one foot high concrete curb that prevents run-on and runoff of liquids. The concrete floor and curb are treated with chemical-resistant epoxy filler-sealer and protective coating.

Area L has stored the following waste types: spent solvents; paints and related wastes; photographic and photocopier wastes; corrosive liquids; solid metals and metallic compounds; off-specification commercial chemical products; gas cylinders; solidified inorganic solids; leached process residues; chemical salts and cement paste; ash; dewatered aqueous sludge; chemical treatment sludge; soils; combustible debris (*e.g.*, plastics, rubber, laboratory trash, building debris); and heterogeneous debris.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information about waste management procedures and hazardous waste constituents stored at the permitted unit.

### **3.0 ESTIMATE OF MAXIMUM WASTE STORED**

The estimated volume for the maximum inventory of waste managed over the active life of the permitted unit to date is 1,958,000 gallons. Approximately 2,216,000 gallons of waste is expected to be stored at the permitted unit over the active life of this Permit.

## **4.0 GENERAL CLOSURE REQUIREMENTS**

### **4.1 Closure Performance Standards**

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the clean-up levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I.

Closure of the unit will be deemed complete when: 1) all structures, surfaces, and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

#### **4.2 Closure Schedule**

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.15-1 in this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR § 264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Soil sampling and decontamination verification sampling will be conducted to demonstrate that soils, surfaces, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit can not proceed according to schedule, the Permittees will notify the Department in accordance with the extension requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated equipment associated with the permitted unit; verification that the closure performance standards have been achieved; and submittal of a final closure certification report. The following sections describe closure activities applicable to the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous wastes will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport from the permitted unit. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous waste will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and an assessment of the unit will be conducted to determine any finding(s) or action(s) that may influence closure activities or additional sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed as outlined in Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of any spills or chronic conditions identified in the Operating and Inspection Records).

#### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the floors, walls, and ceilings of storage buildings 68, 69, and 70, Storage Shed 31, and Building 39, the floors in Dome 215, where Canopy 216 was located, and covered storage pads 32, 35, 36, and 58, and the floor of the permitted unit for any existing cracks or conditions that indicate a potential for release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

### **5.3 Decontamination and Removal of Equipment and Structures**

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents will be removed from the permitted unit. The permitted unit's structures and related equipment will be decontaminated, removed, or both and managed appropriately. All waste

material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*), Permit Section 9.4.5, and Facility waste management procedures. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous constituents from the permitted unit to meet the closure performance standards outlined in Permit Section 9.2.

### **5.3.1 Removal of Structures and Related Equipment**

All structures and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

The following structures and equipment will be removed before the structural assessment: Dome 215; equipment related to the dome and canopy (*e.g.*, tensioned-fabric membranes, aluminum beams, trusses, ancillary equipment); and Building 39. The following structures and equipment will be removed after the structural assessment: the permitted unit (the asphalt pad at Area L within the fence line and its related materials (*e.g.*, asphalt, concrete ringwall, foundations, minimum of six inches of the base course, soil underlying the asphalt)); concrete storage pads 32, 35, 36, and 58; all the materials associated with the four concrete storage pads; and the double-walled holding tank.

If after the removal of the pad (and underlying soil and base course material) the remaining surface shows evidence that the removal to that point has not gathered all appropriate soils and materials associated with the permitted unit, additional soil and materials will be removed. If it is determined to be appropriate at the time of the assessment, soil samples may be collected through the asphalt (before the pad and its materials have been removed) from areas where contamination is suspected (*i.e.*, locations of stains or known spills).

In the event that alternative closure requirements, in accordance Permit Section 9.2.2.2, are applied to the closure of this permitted unit, the Permittees shall take precautions to not remove or disturb the soil or tuff that overlies the regulated unit (covered under the March 1, 2005 Compliance Order on Consent (Order) (*see* Permit Section 9.3)) beneath the permitted unit.

### **5.3.2 Decontamination of Equipment**

All structures and related equipment that will be reused by the Facility will be decontaminated (*see* Table G.15-6 of this closure plan) in accordance with Permit Section 9.4.3.1. This includes: the storage sheds (68, 69, 70, and 31); the PermaCon<sup>®</sup>; the equipment cabinets; the portable air monitors; all the electronic devices and tools; and the spill cleanup equipment containers. This list of equipment requiring decontamination will be revised during the review and assessment.

Equipment and operating machinery that is not sensitive to water intrusion, such as the storage sheds, the PermaCon<sup>®</sup>, and the equipment cabinets, will be decontaminated by steam cleaning or pressure washing with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water mixed in accordance with the manufacturer's recommendations. All other equipment at the permitted unit that is sensitive to water intrusion (*i.e.*, portable air monitors, electronic devices or tools, and spill cleanup equipment containers in the dome and canopy) will be decontaminated by washing using a wipe-down method with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water mixed in accordance with the manufacturer's recommendations.

The quantity of the wash solution will be minimized by dispensing from buckets, spray bottles, or other types of containers. Cloths, or other absorbent cleaning devices, will not be reused to wipe down the equipment after being wetted in the wash solution or after spraying solution onto the equipment. Portable berms, or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment), will collect excess wash water and provide containment during the decontamination process. The fire suppression water drain in Domes 215 will be plugged before decontamination activities begin.

#### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during closure activities will be cleaned with a wash water solution. The solution will be characterized and managed as a hazardous waste if appropriate. Residue, disposable equipment, and equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.15-2 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

### **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis and quality assurance and quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

#### **6.1 Soil Sampling and Decontamination Verification Sampling Activities**

Soil sampling and decontamination verification sampling activities will be conducted to verify that soils, structures, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from each wall of the storage sheds (68, 69, 70, and 31), Building 39, and the Perma-Con<sup>®</sup>, one from each ceiling, one from each floor, and one from the 12 sumps in these structures for a minimum of 48 wipe samples. The locations for these samples will be determined randomly within the area of each surface.

In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of soil samples from the following locations:

- a. one soil sample in front of each storage shed (68, 69, 70, and 31) associated with the permitted unit for a total of four samples (*see* Permit Section 9.4.7.1.ii(1));
- b. one soil sample every 900 square feet of the permitted unit for a total of 123 samples (*see* Permit Section 9.4.7.1.ii(2));
- c. one sample to address stormwater runoff identified as ‘sample location 1’ (*see* Permit Section 9.4.7.1.ii(3) and discussion below for rationale of sample locations);
- d. one sample at the discharge point of the underground piping from the double-walled fire water collection holding tank identified as ‘sample location 2’ (*see* Permit Section 9.4.7.1.ii(4));

- e. one sample at the sump located in Dome 215 (*see* Permit Section 9.4.7.1.ii(5)); and
- f. one sample at all joints and intersections of the permitted unit's underground piping (*see* Permit Section 9.4.7.1.ii(5)).

At the time of sampling, the precise locations of the grid samples will be randomly selected within each 900 square foot sampling box (*see* Figure G.15-1). These locations will be determined by applying a sub-grid of potential sampling points and randomly choosing one. This sampling strategy will result in a minimum of 123 samples collected from the permitted unit. If the review or assessment determines the need to obtain additional samples collected within the area of the sampling box (*e.g.*, at asphalt cracks), these sample collection locations will be in addition to the grid sample locations.

Rainwater flow at the permitted unit is directed across the pad by the eastward slope and through a drainage point in the north-east section of the surrounding fence. A sample will be collected where this outlet discharges to soil.

A soil sample will also be collected where liquid discharges from the double-walled fire water collection holding tank on the eastern end of the permitted unit (identified as 'sample 2' on Figure G.15-2).

If there is liquid found in any of the 12 sumps, the double-walled holding tank, or the piping system at the time of the assessment, liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 1986 and EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Liquid Sampling**

Liquid samples will be collected and analyzed to determine if residual hazardous constituents remain in the sumps, holding tank, or drain lines at the permitted unit. Liquid samples will be collected using glass or plastic tubes, a composite liquid waste sampler, a bacon bomb, a bailer, or by pouring liquid into sample containers.

### **6.2.2 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on structures or equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.3 Soil Sampling**

Soil samples will be collected and analyzed to determine if hazardous constituents are present in soils at the permitted unit. Soil samples will be collected using a spade, scoop, auger, trowel, or other equipment as specified in approved methods for the type of analyte (*i.e.*, EPA 1996 or 2002) and from the appropriate depths as directed in Permit Section 9.4.7.1.ii. Samples will be kept at their at-depth temperature or lower, protected from ultraviolet light, sealed tightly in the recommended container, and analyzed within the specific holding times listed in Table G.15-4.

### **6.2.4 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

## **6.3 Sample Management Procedures**

The following section provides a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until the samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request/chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory

analysis. The completed original chain-of-custody form will be returned by the analytical laboratory and will become a part of the permanent record documenting the sampling effort.

#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.



### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.15-4 presents the requirements in SW-846 (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish these requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, waste, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization, unless the shipper is specifically authorized through formal documentation by that organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all the hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.15-3. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.15-3. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2. The analytical laboratory will have:

- a. a documented comprehensive QA/ QC program,
- b. technical analytical expertise,
- c. a document control and records management plan, and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.15-3 was based on the following considerations:

- e. the physical form of the waste;
- f. constituents of interest;
- g. required detection limits (*e.g.*, regulatory thresholds); and

- h. information requirements (*e.g.*, waste classification).

#### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods” (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contaminations associated with the sampling and analysis process and are described in the following sections, along with information on calculations necessary to evaluate the QC results.

##### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.15-5 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

##### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

## 7.0 WASTE MANAGEMENT

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials: these wastes are listed with potential disposal options in Table G.15-2 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment, as summarized in Table G.15-2, that cannot be decontaminated will be containerized and managed as waste.

## 8.0 CLOSURE CERTIFICATION REPORT

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## 9.0 REFERENCES

DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.

EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.

EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, D.C.

LANL, 1999. "Screening Level Ecological Risk Assessment Methods," LA-UR-99-1406, Los Alamos National Laboratory, Los Alamos, New Mexico.

NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4<sup>th</sup> ed. Issue 1. 1994.

NMED, 2006. "Technical Background Document for Development of Soil Screening Levels," Rev. 4.0, June 2006, New Mexico Environment Department, Santa Fe, New Mexico.

**Table G.15-1**

**Closure Schedule for the Technical Area 54, Area L Outdoor Container Storage Unit**

Activity	Maximum Time Required
Notify the Department of intent to close.	-45 days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.15-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.

Potential Waste Materials	Waste Types	Disposal Options
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded waste management equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Sampling equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Dome structures	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

Potential Waste Materials	Waste Types	Disposal Options
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Asphalt	Non-regulated solid waste	Subtitle D landfill or potentially, as included in corrective action activities at Area G.
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.

**Table G.15-3**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
Metal Analysis				
Antimony	6010, 7010	ICP-AES, GFAA	20 ug/L	Determine the metal concentration in the samples.
Arsenic	6010, 7010, 7061A	ICP-AES, GFAA, CVAA	10 ug/L	
Barium	6010, 7010	ICP-AES,GFAA	200 ug/L	
Beryllium	6010, 7010	ICP-AES, GFAA	0.2 ug/L	
Cadmium	6010, 7010	ICP-AES, GFAA	2 ug/L	
Chromium	6010, 7010	ICP-AES, GFAA	10 ug/L	
Cobalt	6010, 7010	ICP-AES, GFAA	5 ug/L	
Copper	6010, 7010	ICP-AES, GFAA	5 ug/L	
Lead	6010, 7010	ICP-AES, GFAA	5 ug/L	
Mercury	6010, 7470A, 7471B	ICP-AES, CVAA	0.2 ug/L	
Selenium	6010, 7010, 7741A	ICP-AES, GFAA, CVAA	5 ug/L	
Silver	6010, 7010	ICP-AES, GFAA	10 ug/L	
Thallium	6010, 7010	ICP-AES, GFAA	30 ug/L	
Vanadium	6010, 7010	ICP-AES, GFAA	5 ug/L	
Zinc	6010, 7010	ICP-AES, GFAA	1 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.



Target compound list SVOCs plus 20 TICs	8270D, 8275	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.
<i>Other Parameters</i>				
Cyanide	9010, 9012	Colorimetric	20 ug/L	Determine cyanide concentration

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

CVAA = Cold-vapor atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy

GC/MS = Gas chromatography/mass spectrometry

GFAA = Graphite furnace atomic absorption spectroscopy

ICP-AES = Inductively coupled plasma-atomic emission spectrometry

mg/L = milligrams per liter

ug/L = micrograms per liter.

**Table G.15-4**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide-Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4°C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
Total Mercury	Aqueous Media:  500-mL Wide-Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4°C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Solid Media:  Cool to 4°C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	
Semi-Volatile Organic Compounds			

Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to extraction. 40 days from extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4°C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HNO<sub>3</sub> = nitric acid

HCl = hydrochloric acid

L = Liter

mL = milliliter

TCLP = Toxicity Characteristic Leaching Procedure

**Table G.15-5**  
**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

QC Sample Type	Applicable Analysis <sup>a</sup>	Frequency	Acceptance Criteria
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (e.g., methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.

**Table G.15-6**  
**List of Equipment at the Technical Area 54, Area L Outdoor Container Storage Unit**

<b>Equipment</b>	<b>Decontamination</b>	<b>Disposal</b>
Perma-Con structure and associated equipment on Pad 36	X	X
Dome and Canopy materials		X
Equipment and spill kit cabinets	X	
Container pallets	X	X
Communication equipment	X	X
Access barriers and chains	X	X
Double-walled holding tank	X	

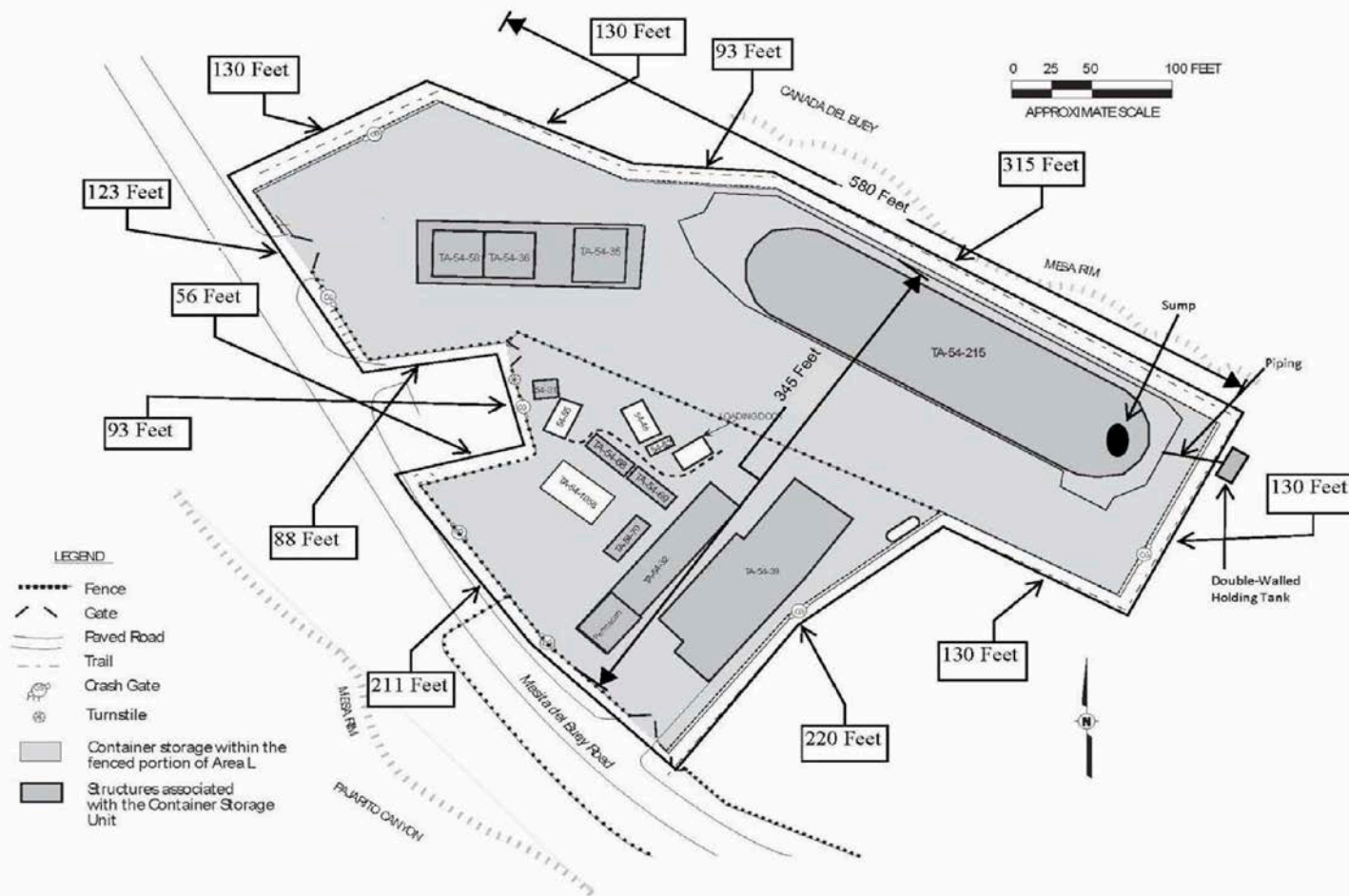


Figure G.15-1: Technical Area 54, Area L, Outdoor Container Storage Unit Sampling Grid and Dimensions

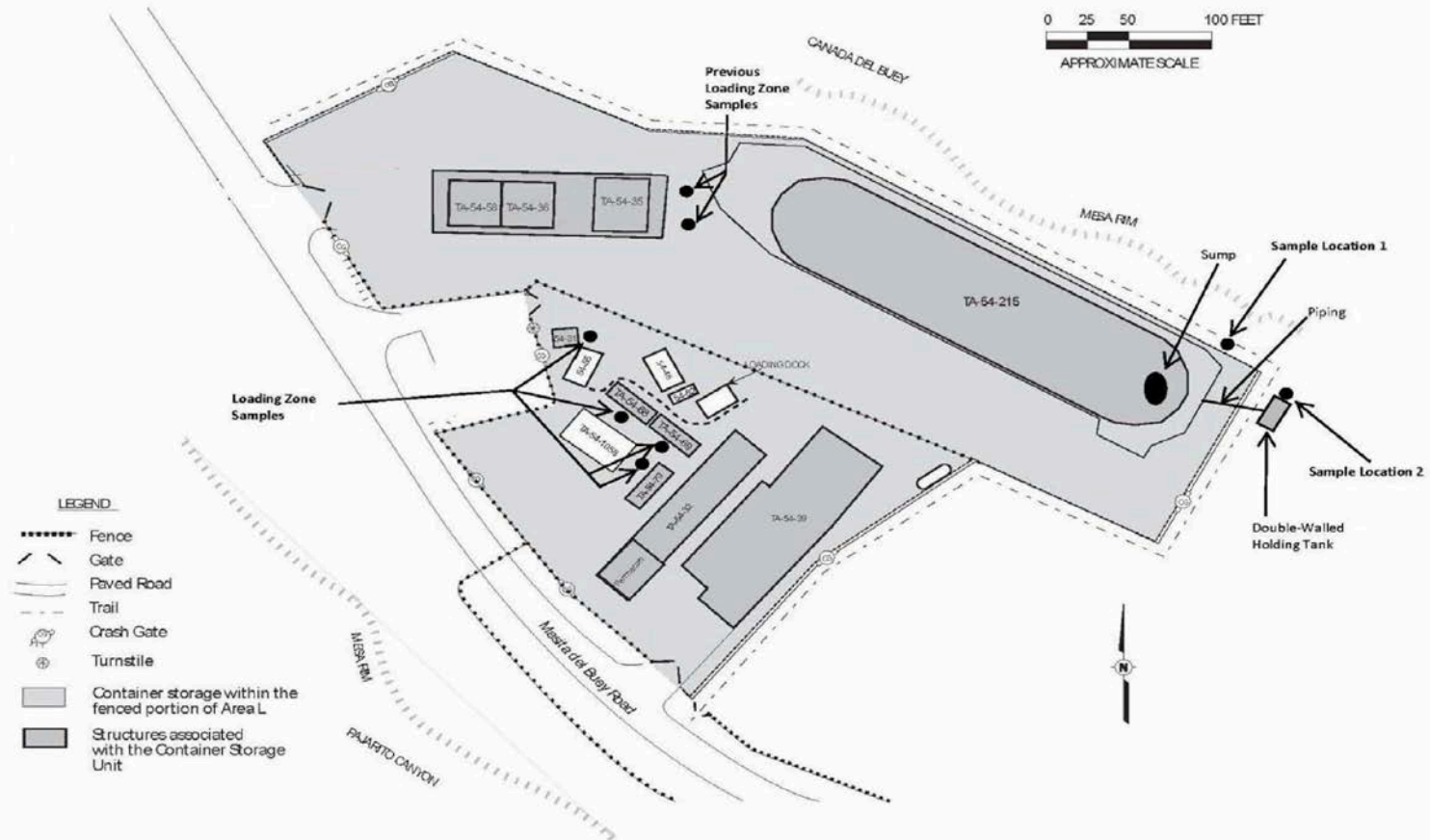


Figure G.15-2: Technical Area 54, Area L, Outdoor Container Storage Unit Additional Soil Sampling Locations

**ATTACHMENT G.16**  
**TECHNICAL AREA 54 WEST, BUILDING 38**  
**INDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**



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<u>FIGURE NO.</u>	<u>TITLE</u>
G.16-1	Technical Area 54, Building 38 (High Bay and Low Bay Sampling Locations)

## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the indoor hazardous waste container storage unit that is comprised of the High Bay and Low Bay rooms located at Technical Area 54 West, Building 38 (TA-54-38) at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9, the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The permitted unit is comprised of the entire High Bay (Room 101) and the entire Low Bay (Room 102). Access between the two bays is provided through a 2.4 meter (m) wide by 3.8 m high roll-up door.

The High Bay has been used to store fiberglass-reinforced plywood boxes, standard waste boxes (SWBs), B25 boxes, and drums of various sizes, is 40 feet (ft) wide and 80 ft long. It is equipped with a 5-ton capacity bridge crane system and back-up crane, a truck-axle weighing scale, loading platforms, and TRUPACT-II and HalfPACT lid stands. The floor is a 6-inch, reinforced, epoxy-coated, concrete slab which gently slopes toward a central 50-ft trench and a sump. The sump is locked out and a pipe plug has been installed. The floor has a grated drain (approximately five (5) inches (in.) wide by 57 ft long) that runs down the center of the bay which collects melting snow and water from the trucks that enter the bay. The permitted container storage area within the High Bay is used as a transuranic (TRU) waste payload-container assembly area and TRUPACT-II/HalfPACT shipper-container loading area. Its primary function is the preparation of waste packages for transport to the Waste Isolation Pilot Plant (WIPP). The TRU waste packaged in the High Bay is predominantly radioactive, but can include mixed waste.

The Low Bay, where waste drums of various sizes are stored, is 40 ft long by 34 ft wide; it was once used for staging hazardous solid and liquid waste while nondestructive radioassay waste characterization activities were performed. The floor is a 6-inch reinforced concrete slab coated with industrial grade enamel paint.

The permitted unit began hazardous waste operations in 1995 when testing of radioassay equipment occurred. Shipments of waste packages from the facility to the WIPP began in 1999. The building was constructed in 1989 and 1990. Specific hazardous waste constituents stored at the permitted unit are included in Tables G.16-1 and G.16-2.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information about waste management procedures and hazardous waste constituents stored at the permitted unit.

## **2.1 Water Collection System**

The permitted unit has a fire water collection system that collects water from TA-54-38. The system was designed to collect firefighting and fire suppression water releases from TA-54-38 and discharge the fire water directly to the fire water retention pond. A collection trench around the perimeter of TA-54-38 captures the fire suppression water and firefighting water released from the building, and conveys the fire water in an underground pipeline that discharges into a fire water retention pond. The pipeline is sloped to provide gravity flow.

## **3.0 ESTIMATE OF MAXIMUM WASTE STORED**

Approximately 612,755 gallons of waste has been stored at the permitted unit since 1995. Throughout the life of this permit, it is estimated that an additional 440,000 gallons of waste will be stored at the permitted unit. The maximum inventory of hazardous waste that will be stored at the unit at any given time is 4,950 gallons as required by Permit Attachment J (*Hazardous Waste Management Units*).

## **4.0 GENERAL CLOSURE INFORMATION**

### **4.1 Closure Performance Standard**

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I for container storage units.

Closure of the permitted unit will be deemed complete when: 1) all surfaces and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

## **4.2 Closure Schedule**

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section explains the schedule of closure activities (*see also* Table G.16-3 of this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR § 264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste the Permittees will conduct the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Decontamination verification sampling activities, and soil sampling if applicable, will be conducted to demonstrate that surfaces, related equipment, and media, if applicable, at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of hazardous waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated surfaces and equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe the closure activities applicable to the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous wastes will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flatbed trucks, trailers, or other appropriate vehicles for transport. Appropriate shipping documentation will accompany the wastes

during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

## **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any previous finding(s) or action(s) that may influence closure activities or potential sampling locations.

### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed in accordance with Permit Section 9.4.6.1. Goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of spills or chronic conditions identified in the Operating and Inspection Records).

### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the floors and walls of the permitted unit for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

## **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with Permit Section 9.4.3, the unit's surfaces and related equipment will be decontaminated, or removed, or both and managed appropriately. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous waste constituents from the permitted unit to meet the closure performance standards.

All surfaces and related equipment that are removed and not intended for recycle will not require decontamination, will be considered solid and potentially hazardous waste when removed, and will be disposed of in accordance with Section 7.0.

### **5.3.1 Removal of Structures and Related Equipment**

At this time, there is no equipment identified for removal from the unit; however, if equipment is identified during the assessment it will be decontaminated, removed, and disposed of in accordance with the appropriate sections of this closure plan.



### **5.3.2 Decontamination of Structures and Related Equipment**

Decontamination of the permitted unit's surfaces and equipment will include all features located within the unit (*e.g.*, drain grates, ladders). The following equipment located at the permitted unit is expected to be left in place and therefore decontaminated: the man lift; the lid stands; the drum wrapper; the portion of the bridge cranes that comes into contact with waste containers; and the floor scales.

The permitted unit's floors and walls (up to 11 ft) will be decontaminated. Decontamination of the permitted unit will be conducted by first removing loose material (*e.g.*, dust, dirt) through sweeping followed by pressure washing or steam cleaning with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water mixed in accordance with the manufacturer's recommendations.

Ceilings of the permitted unit, walls above 11 ft, and the areas outside of the permitted unit will be presumed to be free of contamination unless there is some physical indication of contamination (*e.g.*, staining), the records review reveals that large amounts of liquid volatile or semi-volatile organic hazardous waste was stored in the permitted unit, or a spill or release occurred within the permitted unit that could have affected the ceiling or the walls above 11 ft.

Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

The floor drain in the High Bay will be plugged before decontamination activities begin to ensure that none of the wash water solution enters the drain located on the floor.

### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during closure decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.16-4 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

## **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

### **6.1 Decontamination Verification Sampling Activities**

Decontamination verification sampling activities, and soil sampling if applicable, will be conducted at the permitted unit in order to verify that surfaces and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of:

- a. nine wipe samples from the High Bay (*see* Figure G.16-1):

1. four from the floor;
  2. one from each wall; and
  3. one from the sump;
- b. six wipe samples from the Low Bay (*see* Figure G.16-1):
1. two from the floor; and
  2. one from each wall
- c. The captured fire suppression and firefighting water released from the building conveys in an underground pipeline that discharges into a fire water retention pond. In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of soil samples in the following location:
1. One sample at the joints and intersections of the fire water collection system piping

If liquid is found in the sump in the High Bay at the time of the assessment, liquid samples will be collected in accordance with Section 6.2.1 of this closure plan.

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Liquid Sampling**

Liquid samples will be collected and analyzed to determine if residual hazardous constituents remain in the drain at the permitted unit. Liquid samples will be collected using glass or plastic tubes, a composite liquid sampler, a bacon bomb, a bailer, or by pouring liquid in sample containers.

### **6.2.2 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on the surfaces and related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100-square-centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead).

For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.3 Solid Chip Sampling**

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit. Any non-porous inclusions from the sampling location will be removed by brushing or wiping. Using a chisel, drill, hole saw, or similar tool, a minimum 100 grams of the sample will be collected to a depth of 2 cm, or to an alternate depth specified in the assessment and transferred to an appropriate sampling container. The holding time and the preservation techniques to be used for each analysis will be determined from Table G.16-5.

### **6.2.4 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

## **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until the samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request/chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed original chain-of-custody form to the Facility and it will become part of the permanent sampling record documenting the sampling efforts.

#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and

- k. name(s) of personnel responsible for the observations.

### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.16-5 presents the requirements in SW-846 (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish the requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, wastes, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization unless the shipper is specifically authorized through formal documentation by the packaging and transportation organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history (*see* Tables G.16-1 and G.16-2). Tables G.16-1 and G.16-2 will be modified, as necessary, to incorporate changes as a result of the permitted unit's records review. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.16-6. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.16-6. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2. This analytical laboratory will have:

- a. a documented comprehensive QA/QC program;
- b. technical analytical expertise;
- c. a document control/records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.16-6 is based on the following considerations:

- e. the capability to perform data reduction, validation, and reporting;
- f. the physical form of the waste;
- g. constituents of concern;
- h. required detection limits (*e.g.*, regulatory thresholds); and
- i. information requirements (*e.g.*, waste classification).

#### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods” (*SW-846*) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contamination associated with the sampling and analysis process, and is described in the following sections, along with information on calculations necessary to evaluate the QC results.

##### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.16-7 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

##### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound and statistically valid and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;

- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe sample preparations that occur during the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

## **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials: these wastes are listed with potential disposal options in Table G.16-4 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.16-4, will be containerized and managed as waste.

## **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## **REFERENCES**

- DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.
- EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.
- EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, DC.
- NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.

**Table G.16-1**

**Hazardous Waste Constituents of Concern at the Technical Area 54, Building 38 High Bay<sup>a</sup>**

Category	EPA Hazardous Waste Numbers	Specific Constituents
Toxic Metals	D003, D004, D005, D006, D007, D008, D009, D010, D011	Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
Organic Compounds	D018, D019, D021, D022, D028, D035, D038, D039, D040, D043  F001, F002, F003, F004, F005, U080	Benzene, Carbon Tetrachloride, Chlorobenzene, Chloroform, 1,2 – Dichloroethane, Methyl ethyl ketone, Pyridine, Tetrachloroethylene, Vinyl Chloride  Tetrachloroethylene, Trichloroethylene, Methylene Chloride, 1,1,1-trichloroethane, Chlorinated Fluorocarbons, Trichloroethylene, 1,1,2- Trichloro-1,1,2-Trifluoroethane, Ortho-dichlorobenzene, Trichlorofluoromethane, 1,1,2-Trichloroethane, Xylene, Acetone, Ethyl acetate, Ethyl benzene, Ethyl ether, Methyl Isobutyl Ketone, n-Butyl alcohol, Cyclohexanone, Methanol, Cresols, Cresylic acid, Nitrobenzene, Toluene, Carbon disulfide, Isobutanol, Benzene, 2-Ethoxyethanol, 2-Nitropropane, Dichloromethane

<sup>a</sup> Based on the permitted unit's Operating Record



**Table G.16-2**

**Hazardous Waste Constituents of Concern at the Technical Area 54, Building 38 Low Bay<sup>a</sup>**

Category	EPA Hazardous Waste Numbers	Specific Constituents
Toxic Metals	D003, D004, D005, D006, D007, D008, D009, D010, D011	Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
Organic Compounds	D018, D019, D021, D022, D028, D035, D038, D039, D040, D043  F001, F002, F003, F004, F005, U080	Benzene, Carbon Tetrachloride, Chlorobenzene, Chloroform, 1,2 – Dichloroethane, Methyl ethyl ketone, Pyridine, Tetrachloroethylene, Vinyl Chloride  Tetrachloroethylene, Trichloroethylene, Methylene Chloride, 1,1,1-trichloroethane, Chlorinated Fluorocarbons, Trichloroethylene, 1,1,2- Trichloro-1,1,2-Trifluoroethane, Ortho-dichlorobenzene, Trichlorofluoromethane, 1,1,2-Trichloroethane, Xylene, Acetone, Ethyl acetate, Ethyl benzene, Ethyl ether, Methyl Isobutyl Ketone, n-Butyl alcohol, Cyclohexanone, Methanol, Cresols, Cresylic acid, Nitrobenzene, Toluene, Carbon disulfide, Isobutanol, Benzene, 2-Ethoxyethanol, 2-Nitropropane, Dichloromethane

<sup>a</sup> Based on the permitted unit's Operating Record.

**Table G.16-3**

**Closure Schedule for the TA-54 West, Building 38, Indoor Container Storage Unit**

<b>Activity</b>	<b>Maximum Time Required</b>
Notify the Department of intent to close.	-45 Days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.16-4**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste

**Figure G.16-4 (cont.)**

**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
		disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded concrete	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill, recycled, or reused
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Discarded waste management equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Sampling equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.

**Figure G.16-4 (cont.)**

**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

**Table G.16-5**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
TCLP/Total Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
TCLP/Total Mercury	Aqueous Media:  500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon- Lined Septa	Solid Media  Cool to 4 °C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	

<i>Semi-Volatile Organic Compounds</i>			
Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to extraction. 40 days from extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4 °C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods,” SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HCl = hydrochloric acid

mL = milliliter

HNO<sub>3</sub> = nitric acid

L = Liter

TCLP = Toxicity Characteristic Leaching Procedure

**Table G.16-6**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
<b><i>Metal Analysis</i></b>				
Arsenic	7060A <sup>c</sup> , 7061A	FLAA, GFAA	10 ug/L	Determine the metal concentration in the samples.
Barium	7080A <sup>d</sup> , 7081 <sup>c</sup>	FLAA, GFAA	200 ug/L	
Cadmium	7130 <sup>d</sup> , 7131A <sup>c</sup>	FLAA, GFAA	2 ug/L	
Chromium	7190 <sup>d</sup> , 7191 <sup>c</sup>	FLAA, GFAA	10 ug/L	
Lead	7420 <sup>d</sup> , 7421 <sup>c</sup>	FLAA, GFAA	5 ug/L	
Mercury	7470A, 7471A <sup>e</sup>	CVAA	0.2 ug/L	
Selenium	7740 <sup>c</sup> , 7741A	FLAA, GFAA	5 ug/L	
Silver	7760A <sup>d</sup> , 7761 <sup>c</sup>	FLAA, GFAA	10 ug/L	
<b><i>Organic Analysis</i></b>				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.
Target compound list SVOCs plus 20 TICs	8270D <sup>c</sup>	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

<sup>c</sup> Method being integrated into Method 7010, per the May 1998 SW-846 Draft Update IVA.

<sup>d</sup> Method being integrated into Method 7000B, per the May 1998 SW-846 Draft Update IVA.

<sup>e</sup> Method being revised to 7471B per the May 1998 SW-846 Draft Update IVA.

CVAA = Cold-vapor atomic absorption spectroscopy; GFAA = Graphite furnace atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy; GC/MS = Gas chromatography/mass spectrometry;

mg/L = milligrams per liter; ug/L = micrograms per liter





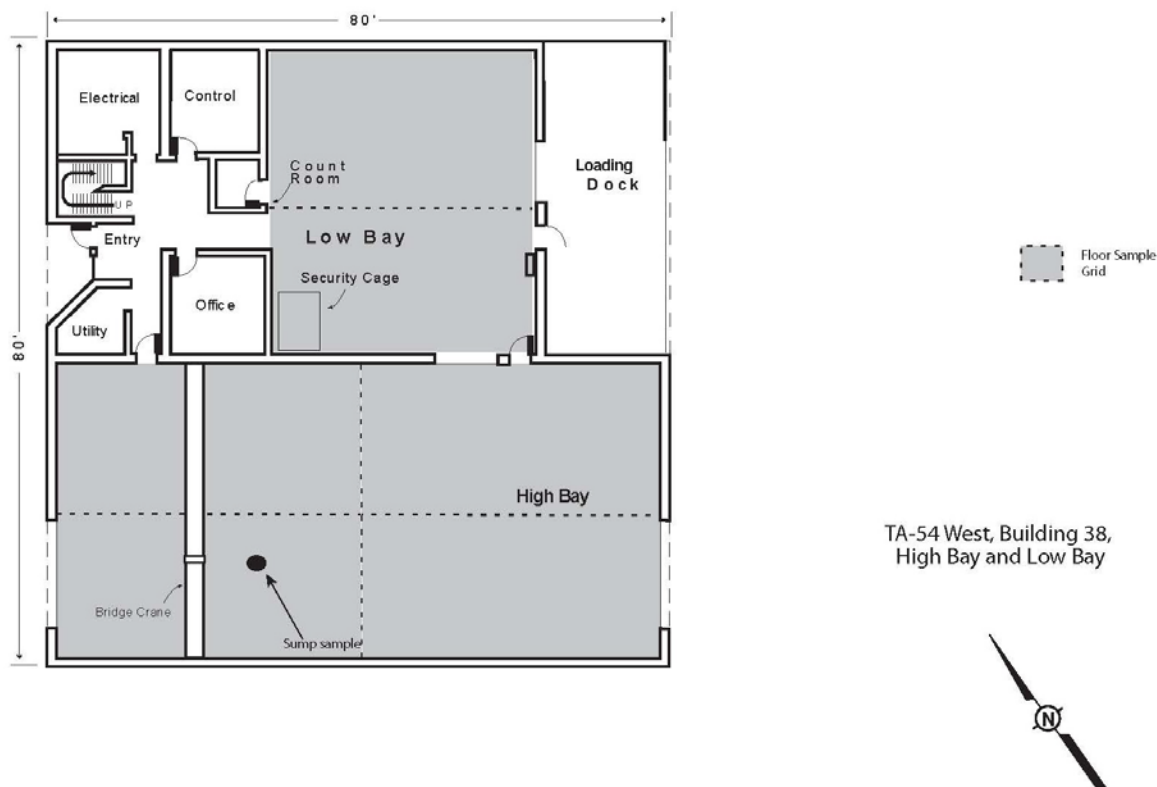
**Table G.16-7**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

<b>QC Sample Type</b>	<b>Applicable Analysis <sup>a</sup></b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (*e.g.*, methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.



**Figure G.16-1:** Technical Area 54, Building 38 (High, Low Bay, and Loading Dock Sampling Locations)

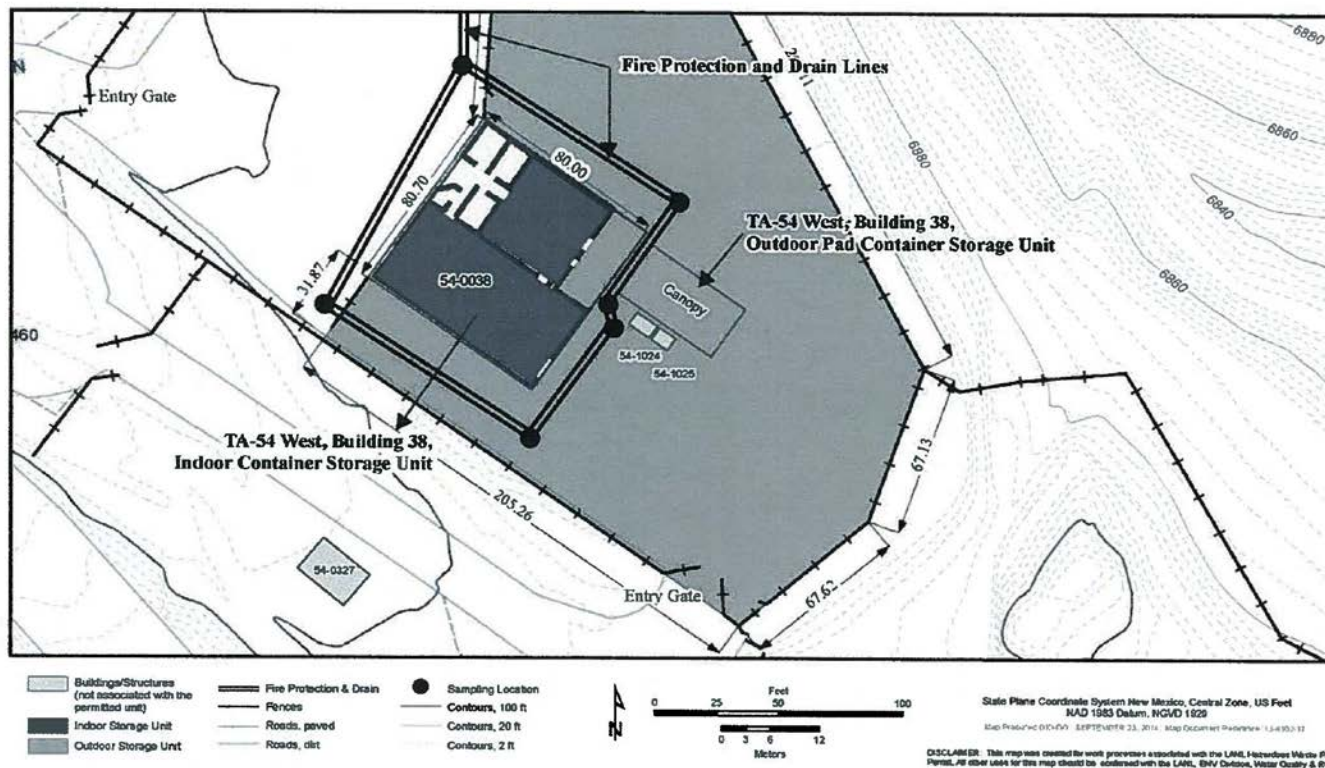


Figure G.16-2: Technical Area 54, Building 38 (High and Low Bay) Additional Sampling Locations

**ATTACHMENT G.17**  
**TECHNICAL AREA 54, WEST**  
**OUTDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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<u>FIGURE NO.</u>	<u>TITLE</u>
G.17-1	Technical Area 54 West Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations

## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at Technical Area 54 West, Building 38 (TA-54-38) at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The permitted unit is located on the north and east sides of TA-54-38 and consists of an asphalt pad (which slopes toward the north and east and has a thickness of approximately four inches) and a loading dock which measures 16 ft wide by 38 ft, 10 inches long. The loading dock is constructed of six inch cast-in-place concrete, is approximately 4 inches above grade, and is covered by a metal roof awning. Small storage sheds (1024 and 1025) for supplies and equipment and not for the storage of hazardous waste, are also located on the permitted unit. The entire permitted unit measures approximately 37,900 square feet.

The slope of the asphalt pad allows for storm water to run off the pad into a one inch wide trench drain that runs along the north edge of the pad. The eastern edge of the pad consists of an asphalt swale that collects storm water and conveys it to a single discharge point at the northeast corner of the site. An asphalt berm running from the extreme northern corner of Building 38 to the drain flanks the northern side of the permitted unit and an asphalt curb flanks the southern side.

The waste typically stored at the permitted unit consists of hazardous and mixed waste in both solid and liquid form. The permitted unit was constructed in 1993, became operational in 1998, and has been subject to waste management regulations under RCRA since its construction. In 2007, the boundaries of the permitted unit were expanded to include the current configuration. The stored wastes include corrosive liquids, sludge, debris, and chemical wastes with metals and volatile and semi-volatile organic constituents.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information about waste management procedures and hazardous waste constituents stored at the permitted unit.

The loading dock, located just east of the low bay, is approximately 16 ft wide and 39 ft long and is constructed of cast-in-place concrete. A canopy runs perpendicular to the loading dock platform. Waste drums of various sizes are stored in the loading dock.

### **3.0 ESTIMATE OF MAXIMUM WASTE STORED**

To date, approximately 612,755 gallons of waste has been stored in the permitted unit. Throughout the life of this Permit it is estimated that an additional 1,870,000 gallons of waste will be stored in the permitted unit. The maximum inventory of hazardous waste that will be stored at the unit at any given time is 42,570 gallons as required by Permit Attachment J (*Hazardous Waste Management Units*).

### **4.0 GENERAL CLOSURE INFORMATION**

#### **4.1 Closure Performance Standard**

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264, Subparts G and I.

Closure of the unit will be deemed complete when: 1) all structures, surfaces, and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

## **4.2 Closure Schedule**

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.17-2 in this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will be according to requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR § 264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur at the same time as notification of closure (*see* Permit Section 9.4.6.2).

Within 90 days after the final receipt of waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, whichever comes first, the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Soil sampling and decontamination verification sampling activities will be conducted to demonstrate that soils, structures, surfaces, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Facility will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated equipment associated with the permitted unit; verification that the closure performance standards have been achieved; and submittal of a final closure certification report. The following sections describe closure activities applicable to the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous wastes will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and a structural assessment will

be conducted to determine any previous finding(s) or action(s) that may influence closure activities or potential sampling locations.

### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed as outlined in Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of spills or chronic conditions identified in the Operating and Inspection Records).

### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the asphalt pad and the loading dock for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

## **5.3 Decontamination and Removal of Structures and Equipment**

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents will be removed from the permitted unit. The permitted unit's structures and related equipment will be decontaminated, removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*), Permit Section 9.4.5, and Facility waste management procedures (*see* Table G.17-3). Decontamination activities will ensure the removal of all hazardous waste residues and hazardous waste constituents from the permitted unit to meet the closure performance standards as outlined in Permit Section 9.2.

### **5.3.1 Removal of Structures and Related Equipment**

All surfaces, structures, and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

At this time, there is no equipment identified for removal from the unit; however, if equipment is identified during the assessment, it will be removed and disposed of in accordance with Permit Section 9.4.3.2. The canopy, asphalt pad, the materials associated with the asphalt pad (*e.g.*, the berm around the pad), and a minimum of six inches of the base course and soil underlying the asphalt pad shall be removed after the assessment. If after the removal of the pad (and underlying soil and base course material) the remaining surface shows evidence that the removal to that point has not gathered all appropriate soils and materials associated with the pad, additional soil and materials will be removed. The Permittees shall take precautions to not remove or disturb the soil or tuff that overlies the regulated unit (covered under the March 1, 2005 Compliance Order on Consent (*see* Permit Section 9.3)) beneath the permitted unit. The option of removing small areas of asphalt at sampling locations where contamination

is suspected (*i.e.*, locations of spills or stains) to allow sampling without disturbing the surrounding area prior to the general removal of the pad will be assessed at the time of the assessment.

### **5.3.2 Decontamination of Structures and Related Equipment**

All structures and related equipment that will be reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. The following structures and equipment located at the permitted unit is expected to be left in place and will therefore be decontaminated: the loading dock and the metal awning.

Water-resistant structures and equipment (*i.e.*, the loading dock, the awning) at the permitted unit and not sensitive to water intrusion will be decontaminated by steam cleaning, or pressure washing, with a solution consisting of a surfactant detergent (*e.g.*, Alconox®) and water and mixed in accordance with the manufacturer's recommendation. All other equipment at the permitted unit that is sensitive to water intrusion (*e.g.*, electronic devices or tools) will be decontaminated by washing using a wipe-down method with a solution consisting of a surfactant detergent (*e.g.*, Alconox®) and water and mixed in accordance with the manufacturer's recommendation.

The quantity of the wash solution will be minimized by dispensing from buckets, spray bottles, or other types of containers. Cloths, or other absorbent cleaning devices, will not be reused to wipe down the equipment after being wetted in the wash solution or after spraying solution onto the equipment. Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess water and provide containment during the decontamination process.

### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.17-3 and in accordance with Facility waste management procedures, depending on the regulated constituents present.

## **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

### **6.1 Soil Sampling and Decontamination Verification Wipe Sampling Activities**

Soil sampling and decontamination verification wipe sampling activities will be conducted at the permitted unit in order to verify that the soils beneath the permitted unit as well as the unit's surfaces and related equipment meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment related to the permitted unit (*e.g.*, the awning). In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of wipe samples from the floor and walls of the loading dock for a total of four verification samples.

In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of soil samples from the permitted unit at the following locations:

- a. one sample from a known past loading zone area ('sample location 1') identified in the permitted unit's records (*see* Permit Section 9.4.7.1.ii(1));
- b. one sample every 900 square feet of the permitted unit for a total of 46 samples (*see* Permit Section 9.4.7.1.ii(2));
- c. two samples from the swale in the eastern portion of the permitted unit (*see* Permit Section 9.4.7.1.ii(3)); and
- d. one sample every 30 feet along the drain line on the northern boundary of the permitted unit for a total of four samples (*see* Permit Section 9.4.7.1.ii(8)).

An additional two wipe samples are required from the loading dock areas identified as 'Sample Area 1' and 'Sample Area 2.' Figure G.17-1 illustrates the sampling locations discussed in this section.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with the Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporate guidance from the United States Environmental Protection Agency (USEPA) (EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual to determine if residual hazardous constituents remain on the surfaces and related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.2 Soil Sampling**

Soil samples will be collected and analyzed to determine if hazardous constituents are present in soils at the permitted unit. Soil samples will be collected using a spade, scoop, auger, trowel, or other equipment as specified in approved methods for the type of analytes (*i.e.*, EPA 1996 or 2002) and from the appropriate depths as directed in Permit Section 9.4.7.1.ii. Samples will be kept at their at-depth temperature or lower, protected from ultraviolet light, sealed tightly in the recommended container, and analyzed within the specific holding times listed in Table G.10-5.

### **6.2.3 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross-contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

## **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until the samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed chain-of-custody form to the Facility and it will become part of the permanent sampling record documenting the sampling efforts.

#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;



- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

#### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.17-5 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

#### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility

documents establish the requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, waste, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization, unless the shipper is specifically authorized through formal documentation by that organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been managed at the permitted unit over its operational history (*see* Table G.17-1). Table G.17-1 will be modified, as necessary, to incorporate changes as a result of the permitted unit's records review. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.17-4. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.17-4. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2. The analytical laboratory will have:

- a. a documented comprehensive QA/QC program;
- b. technical analytical expertise;
- c. a document control and records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.17-4 is based on the following considerations:

- e. constituents of concern;
- f. the physical form of the waste;
- g. constituents of concern;
- h. required detection limits (*e.g.*, regulatory thresholds); and
- i. information requirements (*e.g.*, waste classification).

### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846) (EPA,

1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contaminations associated with the sampling and analysis process, and are described in the following sections, along with information on calculations necessary to evaluate the QC results.

#### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.17-6 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

#### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units; transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

### **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials: these wastes are listed with potential disposal options in Table G.17-3 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water

solution. Disposable equipment and small reusable equipment that cannot be decontaminated, as summarized in Table G.17-3, will be containerized and managed as waste.

## **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## **9.0 REFERENCES**

- DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.
- EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.
- EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, DC.
- NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.

**Table G.17-1**  
**Hazardous Waste Constituents of Concern at the Technical Area 54, West Outdoor**  
**Container Storage Unit<sup>a</sup>**

Category	EPA Hazardous Waste Numbers	Specific Constituents
Toxic Metals	D003, D004, D005, D006, D007, D008, D009, D010, D011	Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
Organic Compounds	D018, D019, D021, D022, D026, D027, D028, D029, D030, D035, D036, D037, D038, D039, D040, D043  F001, F002, F003, F004, F005	Benzene, Carbon tetrachloride, Chlorobenzene, Chloroform, Cresol, 1,4-Dichlorobenzene, 1,2-Dichloroethylene, 2,4-Dinitrotoluene, Methyl ethyl ketone, Nitrobenzene, Pentachlorophenol, Pyridine, Tetrachloroethylene, Trichloroethylene, Vinyl Chloride  Acetone, Methyl ethyl ketone, , Methylene Chloride, Toluene, MIBK, DBCP, Tetrachloroethylene, 1,1,1-trichloroethane, Chlorinated Fluorocarbons, 1,1,2- trichloro-1,1,2-trifluoroethane, ortho-dichlorobenzene, Trichlorofluoromethane, 1,1,2-trichloroethane, Xylene, Ethyl acetate, Ethyl benzene, Ethyl ether, n-butyl alcohol, Cyclohexanone, Methanol, Cresols, Cresylic acid, Nitrobenzene, Carbon disulfide, Isobutanol, Pyridine, 2-ethoxyethanol, 2-nitropropane

<sup>a</sup> Based on the unit Operating Record

MIBK = methyl isobutyl ketone or 4-methyl-2-pentanone

DBCP = 1,2-dibromo-3-chloropropane

**Table G.17-2**

**Closure Schedule for Technical Area 54, West Outdoor Container Storage Unit**

<b>Activity</b>	<b>Maximum Time Required</b>
Notify the Department of intent to close and conduct structural assessment.	-45 Days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.17-3**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.

Potential Waste Materials	Waste Types	Disposal Options
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded waste management equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Sampling equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Asphalt	Non-regulated solid waste	Subtitle D landfill or potentially, as included in corrective action activities at Area G.
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid	Either an authorized on-site radioactive waste



Potential Waste Materials	Waste Types	Disposal Options
	waste	disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.

**Table G.17-4**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
Metal Analysis				
Barium	6010, 7010	ICP-AES,GFAA	200 ug/L	Determine the metals concentration in the samples.
Cadmium	6010, 7010	ICP-AES, GFAA	2 ug/L	
Chromium	6010, 7010	ICP-AES, GFAA	10 ug/L	
Lead	6010, 7010	ICP-AES, GFAA	5 ug/L	
Mercury	6010, 7470A, 7471B	ICP-AES, CVAA	0.2 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

CVAA = Cold-vapor atomic absorption spectroscopy

GC/MS = Gas chromatography/mass spectrometry

GFAA = Graphite furnace atomic absorption spectroscopy

ICP-AES = Inductively coupled plasma-atomic emission spectrometry

mg/L = milligrams per liter

ug/L = micrograms per liter.

**Table G.17-5**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
TCLP/Total Metals: Barium, Cadmium, Chromium, Lead	Aqueous Media: 500-mL Wide Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media: HNO <sub>3</sub> to pH <2 Cool to 4 °C	180 Days
	Solid Media: 125-mL Glass	Solid Media: Cool to 4 °C	
TCLP/Total Mercury	Aqueous Media: 500-mL Wide Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media: HNO <sub>3</sub> to pH <2 Cool to 4 °C	28 Days
	Solid Media: 125-mL Glass	Solid Media: Cool to 4 °C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media: Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media: HCl to pH<2 Cool to 4 °C	14 days
	Solid Media: 125-mL Glass or Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Solid Media Cool to 4 °C Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HNO<sub>3</sub> = nitric acid

HCl = hydrochloric acid

mL = milliter

TCLP = Toxicity Characteristic Leaching Procedure

**Table G.17-6**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

<b>QC Sample Type</b>	<b>Applicable Analysis <sup>a</sup></b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC, metals	One sample daily	Not Applicable

<sup>a</sup> For VOC analysis, if blank shows detectable levels of any common laboratory contaminant (*e.g.*, methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.



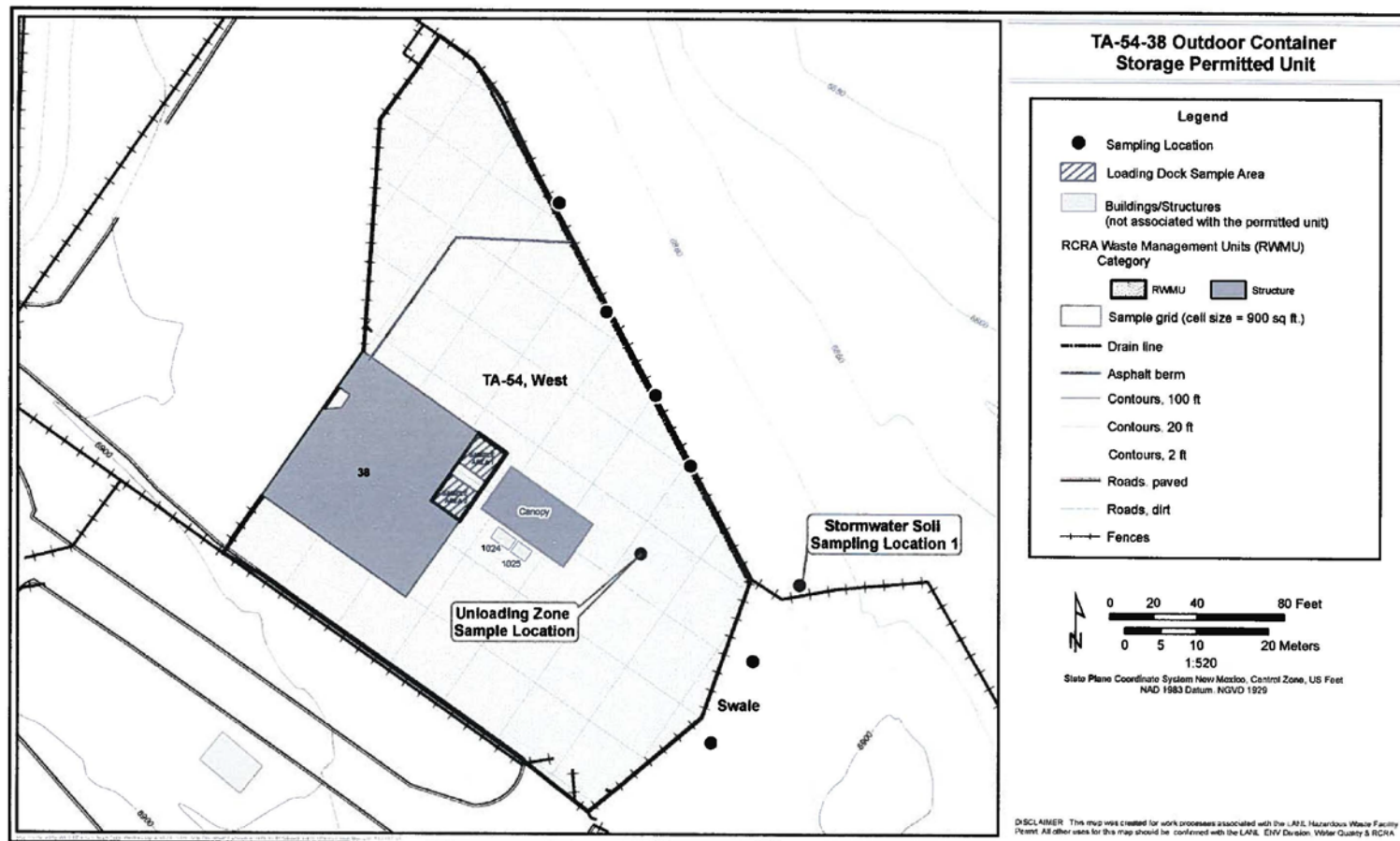


Figure G.17-1: Technical Area 54, West Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations

**ATTACHMENT G.18**  
**TECHNICAL AREA 55, BUILDING 4 ROOM B40**  
**INDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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<u>FIGURE NO.</u>	<u>TITLE</u>
G.18-1	Technical Area 55, Building 4, Room B40, Indoor Container Storage Unit

## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the indoor hazardous waste container storage unit which is located in Room B40 in the basement of Technical Area 55, Building 4 (TA-55-4) at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9, the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The entire floor of the permitted unit has been used for storage of hazardous waste. The permitted unit is L-shaped and has long (outside) dimensions of 61 feet (ft), 5 inches (in.) and 54 ft., 10 in., and short (inside) dimensions of 40 ft, 9 in. and 28 ft. The unit is 27 ft. wide on one end and 20 ft, 8 in. wide on the other. The floor space also includes a vestibule, which has four walls, that is completely enclosed except for two access doorways.

The waste stored at the permitted unit consists of hazardous and mixed waste in both solid and liquid form. The permitted unit was constructed in 1979 and has been subject to hazardous waste management regulations under RCRA since July 25, 1990. Due to the scope of process operations at the permitted unit, the wastes stored include sludge, debris, oils, and chemical wastes with metals and volatile and semi-volatile organic constituents. Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information regarding waste management procedures and hazardous waste constituents stored at the permitted unit.

## 3.0 ESTIMATE OF MAXIMUM WASTE STORED

Approximately 649 cubic meters of waste have been stored in the permitted unit. Throughout the life of this Permit, it is estimated that an additional 360 cubic meters of waste will be stored in the permitted unit.

## 4.0 GENERAL CLOSURE REQUIREMENTS

### 4.1 Closure Performance Standard

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I for container storage units.

Closure of the permitted unit will be deemed complete when: 1) all surfaces and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

### 4.2 Closure Schedule

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.18-2 of this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR §264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Decontamination verification sampling activities, and soil sampling if applicable, will be conducted to demonstrate that surfaces, related equipment, and media, if applicable, at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be submitted to the Department within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated surfaces and equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe closure activities applicable to the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous wastes will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any previous finding(s) or action(s) that may influence closure activities or potential sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed in accordance with Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of spills or chronic conditions identified in the Operating and Inspection Records).

### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the floor and walls of the permitted unit for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

### **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents will be removed from the permitted unit. The permitted unit's surfaces and related equipment will be decontaminated, or removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*), Permit Section 9.4.5, and Facility waste management procedures. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous constituents from the permitted unit to meet the closure performance standards outlined in Permit Section 9.2.

#### **5.3.1 Removal of Structures and Related Equipment**

All surfaces and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan. The four metal cabinets will be removed after the structural assessment.

#### **5.3.2 Decontamination of Structures and Related Equipment**

All surfaces, structures, and related equipment that will be left in place or reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. Decontamination of the permitted unit's surfaces will include all features located within the unit (*e.g.*, pillars). There is currently no equipment located at the permitted unit that is expected to be left in place; however, if equipment identified during the assessment is expected to be left in place, it will be decontaminated in accordance with this section.

Decontamination of the permitted unit will be conducted by first removing loose material (*e.g.*, dust, dirt) through sweeping followed by washing using a manual wipe-down method with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water mixed in accordance with the manufacturer's recommendations.

Wipe-down washing will be utilized because of the need to minimize the potential for exposure to workers and the migration of cleaning solution to other areas of the basement outside the permitted unit's boundary. Migration of the wash solution (in the form of splashing, condensation, or drainage) from steam cleaning or pressure washing may potentially contaminate or otherwise negatively affect ongoing operations within the basement. Migration can potentially be mitigated using plastic barriers taped to surfaces to enclose the area. However, areas enclosed in this manner will require workers to use additional personal protective equipment (PPE). This PPE will include fully enclosed protective wear and supplied air because of the increased risk of exposure to personnel due to potential release of radiological materials and organic compounds and concentration within the enclosure. Enclosure of the

area increases the risk of personnel exhaustion, because of the additional PPE, and the potential for workers to reach radiological work exposure limits. . Therefore, wipe-down washing, rather than steam cleaning or pressure washing, will be utilized because of the need to minimize the potential for exposure to workers and the migration of cleaning solution to other areas of the basement outside the permitted unit's boundary.

The entirety of the unit's floors will be decontaminated. Hazardous waste containers at the permitted unit are stacked. Including the height of any pallets that may have been used, two stacked 55-gallon drums and two stacked standard waste boxes measure just over eight feet high. Therefore, to ensure that decontamination of the walls is conducted to a sufficient height, all walls in the permitted unit will be decontaminated to a height of 11 feet.

Ceilings of the permitted unit, walls above 11 feet, and the areas outside of the permitted unit will be presumed to be free of contamination unless there is some physical indication of contamination (*e.g.*, staining), the records review reveals that large amounts of liquid volatile or semi-volatile organic waste was stored in the permitted unit, or a spill or release occurred within the permitted unit that could have affected the ceiling or the walls above the height of 11 feet.

Cloths, or other absorbent cleaning devices, will not be reused to wipe down the surfaces after being wetted in the wash solution or after spraying solution onto the surfaces. Only one cloth or absorbent cleaning device will be used at a time in a single area to prevent cross-contamination. To minimize the amount of liquid waste generated as a result of decontamination activities, the wash solution will be dispersed from buckets, spray bottles, or other types of small containers.

Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

#### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.18-3 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

### **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

#### **6.1 Decontamination Verification Sampling Activities**

Decontamination verification sampling activities will be conducted at the permitted unit in order to verify that surfaces and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.



One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from the floor and from each wall (up to 11 feet) of the permitted unit. Verification wipe samples will be collected from random locations within each of the sample areas indicated on Figure G.18-1 (provided under separate cover) of this closure plan. A total of 18 wipe samples will be collected: five from the floor; one from each of the four walls; one from each of the four pillars; and five from the vestibule (one from the floor and one from each of the four walls).

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on the surfaces and related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.2 Solid Chip Sampling**

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit. Any non-porous inclusions from the sampling location will be removed by brushing or wiping. Using a chisel, drill, hole saw, or similar tool, a minimum 100 grams of the sample will be collected to a depth of 2 cm, or to an alternate depth specified in the assessment and transferred to an appropriate sampling container. The holding time and the preservation techniques to be used for each analysis will be determined from Table G.18-5.

### **6.2.3 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross-contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

### **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

#### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

##### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed chain-of-custody form to the Facility and it will become part of the permanent sampling record documenting the sampling efforts.

##### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

#### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.18-5 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

#### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish the requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, wastes, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation

organization unless the shipper is specifically authorized through formal documentation by the packaging and transportation organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history (*see* Table G.18-1). Table G.18-1 will be modified, as necessary, to incorporate changes as a result of the permitted unit's records review. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.18-4. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.18-4. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2. This analytical laboratory will have:

- a. a documented comprehensive QA/QC program;
- b. technical analytical expertise;
- c. a document control and records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.18-4 is based on the following considerations:

- e. the physical form of the waste;
- f. constituents of concern;
- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contamination associated with the sampling and analysis process, and is described in the following sections, along with information on calculations necessary to evaluate the QC results.

#### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.18-6 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

#### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe sample preparations that occur during the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

### **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials; these wastes are listed with potential disposal options in Table G.18-3 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.18-7, will be containerized and managed as waste.

## 8.0 CLOSURE CERTIFICATION REPORT

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## 9.0 REFERENCES

- DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.
- EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.
- EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, DC.
- NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.

### Table G.18-1

**Hazardous Waste Constituents of Concern at the Technical Area 55, Building 4, Room B40, Indoor  
Container Storage Unit<sup>a</sup>**

[illegible]

<sup>a</sup> Based on the permitted unit's Operating Record

**Table G.18-2**

**Closure Schedule for the Technical Area 55, Building 4, Room B40, Indoor Container Storage Unit**

<b>Activity</b>	<b>Maximum Time Required</b>
Notify the Department of intent to close.	-45 Days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180



**Table G.18-3**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste

**Table G.18-3**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
		disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded concrete	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill, recycled, or reused
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Discarded waste management equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Sampling equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.

**Table G.18-3**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

**Table G.18-4**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
Metal Analysis				
Arsenic	7060A <sup>c</sup> , 7061A	FLAA, GFAA	10 ug/L	Determine the metal concentration in the samples.
Barium	7080A <sup>d</sup> , 7081 <sup>c</sup>	FLAA,GFAA	200 ug/L	
Cadmium	7130 <sup>d</sup> , 7131A <sup>c</sup>	FLAA, GFAA	2 ug/L	
Chromium	7190 <sup>d</sup> , 7191 <sup>c</sup>	FLAA, GFAA	10 ug/L	
Lead	7420 <sup>d</sup> , 7421 <sup>c</sup>	FLAA, GFAA	5 ug/L	
Mercury	7470A, 7471A <sup>e</sup>	CVAA	0.2 ug/L	
Selenium	7740 <sup>c</sup> , 7741A	FLAA, GFAA	5 ug/L	
Silver	7760A <sup>d</sup> , 7761 <sup>c</sup>	FLAA, GFAA	10 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.
Target compound list SVOCs plus 20 TICs	8270D <sup>c</sup>	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

<sup>c</sup> Method being integrated into Method 7010, per the May 1998 SW-846 Draft Update IVA.

<sup>d</sup> Method being integrated into Method 7000B, per the May 1998 SW-846 Draft Update IVA.

<sup>e</sup> Method being revised to 7471B per the May 1998 SW-846 Draft Update IVA.

CVAA = Cold-vapor atomic absorption spectroscopy; GFAA= Graphite furnace atomic absorption spectroscopy;  
FLAA = Flame atomic absorption spectroscopy; mg/L = milligrams per liter;  
GC/MS = Gas chromatography/mass spectrometry; ug/L = micrograms per liter.

**Table G.18-5**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
TCLP/Total Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
TCLP/Total Mercury	Aqueous Media:  500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon- Lined Septa	Solid Media  Cool to 4 °C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	

<i>Semi-Volatile Organic Compounds</i>			
Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to preparative extraction. 40 days from preparative extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4 °C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HCl = hydrochloric acid

mL = milliter

HNO<sub>3</sub> = nitric acid

L = Liter

TCLP = Toxicity Characteristic Leaching Procedure

**Table G.18-6**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

<b>QC Sample Type</b>	<b>Applicable Analysis<sup>a</sup></b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (*e.g.*, methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.

**Figure G.18-1**

**THIS FIGURE CONTAINS UNCLASSIFIED CONTROLLED NUCLEAR  
INFORMATION (UCNI) AS DEFINED BY SECTION 148 OF THE ATOMIC ENERGY  
ACT**



**ATTACHMENT G.19**  
**TECHNICAL AREA 55, BUILDING 4 ROOM K13**  
**INDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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## LIST OF FIGURES

<u>FIGURE NO.</u>	<u>TITLE</u>
G.19-1	Technical Area 55, Building 4, Room K13 Indoor Container Storage Unit

## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the indoor hazardous waste container storage unit which is located in Room K13 in the basement of Technical Area 55, Building 4 (TA-55-4) at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9, the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The permitted unit is rectangular shaped, is open on three sides, and measures 16 feet (ft) long by 13 ft wide. There is a pillar on one of the open sides. Equipment within the permitted unit used for hazardous waste management is identified on Figure G.19-1 (provided under separate cover). The waste stored at the permitted unit consists of hazardous and mixed waste in both solid and liquid form.

The permitted unit was constructed in 1979 and has been subject to waste management regulations under RCRA since July 25, 1990. Due to the scope of process operations at TA-55-4, the wastes stored include corrosive, reactive, and ignitable liquids, sludge, debris, and chemical wastes with metals and volatile and semi-volatile organic constituents.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information regarding waste management procedures and hazardous waste constituents stored at the permitted unit.

## 3.0 ESTIMATE OF MAXIMUM WASTE STORED

Approximately five cubic meters of waste have been stored in the permitted unit. Throughout the life of this Permit it is estimated that an additional ten cubic meters of waste will be stored in the permitted unit.

## 4.0 GENERAL CLOSURE REQUIREMENTS

### 4.1 Closure Performance Standard

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I for container storage units.

Closure of the permitted unit will be deemed complete when: 1) all surfaces and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

## 4.2 Closure Schedule

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.19-2 in this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR 264.112(d)(2). However, pursuant to 40 CFR § 264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification if necessary. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Decontamination verification sampling activities, and soil sampling if applicable, will be conducted to demonstrate that surfaces, related equipment, and soils, if applicable, at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated structures and equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe closure activities applicable to the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous wastes will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any previous finding(s) or action(s) that may influence closure activities or potential sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed as outlined in Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of spills or chronic conditions identified in the Operating and Inspection Records).

#### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the floor and walls of the permitted unit for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and the



applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

### **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste and hazardous waste residues will be removed from the permitted unit. The permitted unit's structures and equipment will be decontaminated, or removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*), Permit Section 9.4.5, and Facility waste management procedures. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous waste constituents from the permitted unit to meet the closure performance standards outlined in Permit Section 9.2.

#### **5.3.1 Removal of Structures and Related Equipment**

All structures and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan. The unit's three metal cabinets will be removed after the structural assessment.

#### **5.3.2 Decontamination of Structures and Related Equipment**

All surfaces, structures, and related equipment that will be left in place or reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. Decontamination of the permitted unit's surfaces will include all features located within the unit (*e.g.*, pillar). There is no equipment located at the permitted unit that is expected to be left in place; however, if there is equipment identified during the assessment that is expected to be left in place, it will be decontaminated in accordance with this section.

Decontamination of the permitted unit will be conducted by first removing loose material (*e.g.*, dust, dirt) through sweeping followed by washing using a manual wipe-down method with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water mixed in accordance with the manufacturer's recommendations.

Wipe-down washing will be utilized because of the need to minimize the potential for exposure to workers and the migration of cleaning solution to other areas of the basement outside the permitted unit's boundary. Migration of the wash solution (in the form of splashing, condensation, or drainage) from steam cleaning or pressure washing may potentially contaminate or otherwise negatively affect ongoing operations within the basement. Migration can potentially be mitigated using plastic barriers taped to surfaces to enclose the area. However, areas enclosed in this manner will require workers to use additional personal protective equipment (PPE). This PPE will include fully enclosed protective wear and supplied air because of the increased risk of exposure to personnel due to potential release of radiological materials and organic compounds and concentration within the enclosure. Enclosure of the area increases the risk of personnel exhaustion, because of the additional PPE, and the potential for workers to reach radiological work exposure limits. Therefore, wipe-down washing, rather than steam cleaning or pressure washing, will be utilized because of the need to minimize the potential for exposure to workers and the migration of cleaning solution to other areas of the basement outside the permitted unit's boundary.

The entirety of the unit's floors will be decontaminated. Hazardous waste containers at the permitted unit are stacked. Including the height of any pallets that may have been used, two stacked 55-gallon drums and two stacked standard waste boxes measure just over eight feet high. Therefore, to ensure that

decontamination of the walls is conducted to a sufficient height, all walls in the permitted unit will be decontaminated to a height of 11 feet.

Ceilings of the permitted unit, walls above 11 feet, and the areas outside of the permitted unit will be presumed to be free of contamination unless there is some indication of contamination (*e.g.*, staining), the records review reveals that large amounts of liquid volatile or semi-volatile organic waste was stored in the permitted unit, or a spill or release occurred within the unit that could have affected the ceiling or the walls above 11 feet.

Cloths, or other absorbent cleaning devices, will not be reused to wipe down the surfaces after being wetted in the wash solution or after spraying solution onto the surfaces. Only one cloth or absorbent cleaning device will be used at a time in a single area to prevent cross-contamination. To minimize the amount of liquid waste generated as a result of decontamination activities, the wash solution will be dispersed from buckets, spray bottles, or other types of small containers.

Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

#### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.19-3 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

### **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

#### **6.1 Decontamination Verification Sampling Activities**

Decontamination verification sampling activities will be conducted at the permitted unit in order to verify that surfaces and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from the floor and from the walls (up to 11 feet) of the permitted unit. Verification wipe samples will be collected from random locations within each of the sample areas indicated on Figure G.19-1 (provided under separate cover) of this closure plan. A total of five wipe samples will be collected: two from the floor; two from the wall; and one from the pillar.

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with Permit Section 9.4.7.1 and the procedures identified in this sampling and analysis plan which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on the surfaces and related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.2 Solid Chip Sampling**

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit. Any non-porous inclusions from the sampling location will be removed by brushing or wiping. Using a chisel, drill, hole saw, or similar tool, a minimum 100 grams of the sample will be collected to a depth of 2 cm, or to an alternate depth specified in the assessment and transferred to an appropriate sampling container. The holding time and the preservation techniques to be used for each analysis will be determined from Table G.19-5.

### **6.2.3 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross-contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

## **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, sample handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed chain-of-custody form to the Facility and it will become part of the permanent sampling record documenting the sampling efforts.

#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;

- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.19-5 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish the requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, wastes, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization unless the shipper is specifically authorized through formal documentation by the packaging and transportation organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history (*see* Table G.19-1). Table G.19-1 will be modified, as necessary, to incorporate changes as a result of the permitted unit's records review. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.19-4. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.19-4. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

#### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2. This analytical laboratory will have:

- a. a documented comprehensive QA/QC program;
- b. technical analytical expertise;
- c. a document control and records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.19-4 is based on the following considerations:

- e. the physical form of the waste;
- f. constituents of concern;
- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

#### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods” (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contamination associated with the sampling and analysis process, and is described in the following sections, along with information on calculations necessary to evaluate the QC results.

##### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.19-6 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

##### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound and statistically valid and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe sample preparations that occur during the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

## **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials; these wastes are listed with potential disposal options in Table G.19-3 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated will be containerized and managed as waste.

## **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## **9.0 REFERENCES**

DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.

EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.

EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, DC.

NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.



### Table G.19-1

**Hazardous Waste Constituents of Concern at the Technical Area 55, Building 4, Room K13, Indoor  
Container Storage Unit**

Category	EPA Hazardous Waste Numbers	Specific Constituents
Toxic Inorganics	D004, D005, D006, D007, D008, D009, D010, D011	Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
	F006	Wastewater treatment sludge
	P015, P056, P073 P113, P120	Beryllium powder, Fluorine , Nickel carbonyl, Thallic oxide, Vanadium oxide
	U151	Mercury
Organic Compounds	D018, D019, D021, D022, D027, D028, D029, D030, D032, D033, D034, D035, D036, , D037, D038, D039, D040, D041, D042, D043	Benzene; Carbon tetrachloride; Chlorobenzene; Chloroform; 1,4-Dichlorobenzene; 1,2-Dichloroethane; 1,1-Dichloroethylene; 2,4-Dinitrotoluene; Hexachlorobenzene; Hexachlorobutadiene; Hexachloroethane; Methyl ethyl ketone; Nitrobenzene; Pentachlorophenol; Pyridine; Tetrachloroethylene; Trichloroethylene; 2,4,5-Trichlorophenol; 2,4,6-Trichlorophenol; Vinyl chloride
	F001, F002, F003, F005	1,1,1-Trichloroethane; Carbon tetrachloride; Chlorinated fluorocarbons; Methylene Chloride; Tetrachloroethylene; Trichloroethylene; Trichlorofluoroethane; 1,1,1-Trichloroethane; 1,1,2-Trichloro-1,2,2-trifluoroethane; 1,1,2-Trichloroethane; Chlorobenzene; Freon tf; Methyl chloride; Methylene chloride; Ortho-dichlorobenzene; Tetrachloroethylene; Trichloroethylene; Trichloroflouromethane; Acetone; Ethyl ether; Methanol; Methyl isobutyl ketone; n-Butyl alcohol; Xylene; 2-Ethoxyethanol; 2-Nitropropane; Benzene; Carbon disulfide; Isobutanol; Methyl ethyl ketone; Pyridine; Toluene
	U002, U003, U019, U044, U056, U075, U080, U108, U117, U121, U123, U134, U154, U159, U165, U196, U210, U211, U213, U216, U220, U225, U226, U227, U228, U239	Acetone; Acetonitrile; Benzene; Chloroform; Cyclohexane; Dichlorodifluoromethane; Methane,dichloro-; 1,4-Dioxane; Ethane, 1,1'-oxybis-; Methane, trichlorofluoro-; Formic acid; Hydrofluoric acid; Methhanol; Methyl ethyl ketone; Naphthalene; Pyridine; Tetrachloroethylene; Methane, tetrachloro-; Furan, tetrahydro-; Thallium chloride; Toluene; Bromoform; Ethane, 1,1,1-trichloro-; 1,1,2-Trichloroethane; Trichloroethylene; Xylene
Cyanides	F007, F009	Cyanide plating bath solutions, Cyanide stripping cleaning solutions
	P030	Soluble cyanide salts, unspecified

<sup>a</sup>Based on the unit Operating Record

**Table G.19-2**

**Closure Schedule for the Technical Area 55, Building 4, Room K13, Indoor Container Storage Unit**

Activity	Maximum Time Required
Notify the Department of intent to close.	-45 Days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.19-3**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded concrete	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards,

Potential Waste Materials	Waste Types	Disposal Options
		if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill, recycled, or reused
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Discarded waste management equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Sampling equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

**Table G.19-4**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
Metal Analysis				
Arsenic	7060A <sup>c</sup> , 7061A	FLAA, GFAA	10 ug/L	Determine the metal concentration in the samples.
Barium	7080A <sup>d</sup> , 7081 <sup>c</sup>	FLAA,GFAA	200 ug/L	
Cadmium	7130 <sup>d</sup> , 7131A <sup>c</sup>	FLAA, GFAA	2 ug/L	
Chromium	7190 <sup>d</sup> , 7191 <sup>c</sup>	FLAA, GFAA	10 ug/L	
Lead	7420 <sup>d</sup> , 7421 <sup>c</sup>	FLAA, GFAA	5 ug/L	
Mercury	7470A, 7471A <sup>e</sup>	CVAA	0.2 ug/L	
Selenium	7740 <sup>c</sup> , 7741A	FLAA, GFAA	5 ug/L	
Silver	7760A <sup>d</sup> , 7761 <sup>c</sup>	FLAA, GFAA	10 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.
Target compound list SVOCs plus 20 TICs	8270D <sup>c</sup>	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

<sup>c</sup> Method being integrated into Method 7010, per the May 1998 SW-846 Draft Update IVA.

<sup>d</sup> Method being integrated into Method 7000B, per the May 1998 SW-846 Draft Update IVA.

<sup>e</sup> Method being revised to 7471B per the May 1998 SW-846 Draft Update IVA.

CVAA = Cold-vapor atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy

GC/MS = Gas chromatography/mass spectrometry

GFAA = Graphite furnace atomic absorption spectroscopy

mg/L = milligrams per liter

ug/L = micrograms per liter.

**Table G.19-5**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
TCLP/Total Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media: 500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media: HNO <sub>3</sub> to pH <2 Cool to 4 °C	180 Days
	Solid Media: 125-mL Glass	Solid Media: Cool to 4 °C	
TCLP/Total Mercury	Aqueous Media: 500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media: HNO <sub>3</sub> to pH <2 Cool to 4 °C	28 Days
	Solid Media: 125-mL Glass	Solid Media: Cool to 4 °C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media: Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media: HCl to pH<2 Cool to 4 °C	14 days
	Solid Media: 125-mL Glass or Two 40-mL Amber Glass Vials with Teflon- Lined Septa	Solid Media Cool to 4 °C Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	
Semi-Volatile Organic Compounds			
Target Compound Semi-volatile Organic Compounds	Aqueous Media: Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media: Cool to 4 °C	Seven days from field collection to preparative extraction. 40 days from preparative extraction to determinative analysis.
	Solid Media: 250-mL Glass	Solid Media: Cool to 4 °C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HCl = hydrochloric acid

mL = milliter

HNO<sub>3</sub>=nitric acid

L = Liter

TCLP = Toxicity Characteristic Leaching Procedure

**Table G.19-6**  
**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

QC Sample Type	Applicable Analysis <sup>a</sup>	Frequency	Acceptance Criteria
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (*e.g.*, methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.

**Figure G.19-1 has been provided under separate cover**



**ATTACHMENT G.20**  
**TECHNICAL AREA 55, BUILDING 4, ROOM B05**  
**INDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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<u>FIGURE NO.</u>	<u>TITLE</u>
G.20-1	Technical Area 55, Building 4, Room B05 Indoor Container Storage Unit

## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the indoor hazardous waste container storage unit which is located in Room B05 in the basement of Technical Area 55, Building 4 (TA-55-4) at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9, the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The entire floor of the permitted unit has been used for storage of hazardous waste. The permitted unit is rectangular shaped, measures 26 feet (ft) long by 10 ft wide, and is open on three sides as well as a portion of the fourth side. The room also contains two pillars and a chain link fence along the open sides.

The waste stored at the permitted unit consists of hazardous and mixed waste in solid form. The permitted unit was constructed in 1979 and has been subject to hazardous waste management regulations under RCRA since July 25, 1990. Due to the scope of process operations at the permitted unit, the wastes stored include sludge, debris, and chemical wastes with metals and volatile and semi-volatile organic constituents.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information regarding waste management procedures and hazardous waste constituents stored at the permitted unit.

## 3.0 ESTIMATE OF MAXIMUM WASTE STORED

Approximately 980 cubic meters of waste has been stored in the permitted unit. Throughout the life of this Permit it is estimated that an additional 544 cubic meters of waste will be stored in the permitted unit.

## 4.0 GENERAL CLOSURE REQUIREMENTS

### 4.1 Closure Performance Standard

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I for container storage units.

Closure of the permitted unit will be deemed complete when: 1) all surfaces and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to and approved by the Department.

## 4.2 Closure Schedule

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.20-2 of this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR §264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Decontamination verification sampling activities, and soil sampling if applicable, will be conducted to demonstrate that surfaces, related equipment, and media, if applicable, at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe closure activities applicable to the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous waste will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any previous finding(s) or action(s) that may influence closure activities or potential sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed as outlined in Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of spills or chronic conditions identified in the Operating and Inspection Records).

#### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the floor and walls of the permitted unit for any existing cracks or conditions that indicate a potential for release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and the applicable



sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

### **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents will be removed from the permitted unit. The permitted unit's surfaces and related equipment will be decontaminated, or removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*), Permit Section 9.4.5, and Facility waste management procedures. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous constituents from the permitted unit to meet the closure performance standards outlined in Permit Section 9.2.

#### **5.3.1 Removal of Structures and Related Equipment**

All related equipment removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan. The chain-linked fence will be removed before the structural assessment.

#### **5.3.2 Decontamination of Structures and Related Equipment**

All surfaces and related equipment that will be left in place or reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. Decontamination of the permitted unit's surfaces will include all features located within the unit (*e.g.*, pillars). There is no equipment located at the permitted unit that is expected to be left in place; however, if there is equipment identified during the assessment that is expected to be left in place, it will be decontaminated in accordance with this section.

Decontamination of the permitted unit will be conducted by first removing loose material (*e.g.*, dust, dirt) through sweeping followed by washing using a manual wipe-down method with a solution consisting of a surfactant detergent (*e.g.*, Alconox®) and water mixed in accordance with manufacturer recommendations.

Wipe-down washing will be utilized because of the need to minimize the potential for exposure to workers and the migration of cleaning solution to other areas of the basement outside the permitted unit's boundary. Migration of the wash solution (in the form of splashing, condensation, or drainage) from steam cleaning or pressure washing may potentially contaminate or otherwise negatively affect ongoing operations within the basement. Migration can potentially be mitigated using plastic barriers taped to surfaces to enclose the area. However, areas enclosed in this manner will require workers to use additional personal protective equipment (PPE). This PPE will include fully enclosed protective wear and supplied air because of the increased risk of exposure to personnel due to potential releases of radiological materials and organic compounds within the enclosure. Enclosure of the area increases the risk of personnel exhaustion, because of the additional PPE, and the potential for workers to reach radiological work exposure limits. Therefore, wipe-down washing, rather than steam cleaning or pressure washing, will be utilized because of the need to minimize the potential for exposure to workers and the migration of cleaning solution to other areas of the basement outside the permitted unit's boundary.

The entirety of the unit's floors will be decontaminated. Hazardous waste containers at the permitted unit are stacked. Including the height of pallets that may have been used, two stacked 55-gallon drums and

two stacked standard waste boxes measure just over eight feet high. Therefore, to ensure that decontamination of the walls is conducted to a sufficient height, all walls in the permitted unit will be decontaminated to a height of 11 feet.

Ceilings of the permitted unit, walls above 11 feet, and the areas outside of the permitted unit will be presumed to be free of contamination unless there is some physical indication of contamination (*e.g.*, staining), the records review reveals that large amounts of liquid volatile or semi-volatile organic waste was stored in the permitted unit, or a spill or release occurred within the permitted unit that could have affected the ceiling or the walls above the height of 11 feet.

Cloths, or other absorbent cleaning devices, will not be reused to wipe down the surfaces after being wetted in the wash solution or after spraying solution onto the surfaces. Only one cloth or absorbent cleaning device will be used at a time in a single area to prevent cross-contamination. The quantity of the wash solution will be minimized by dispensing from buckets, spray bottles, or other types of small containers.

Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

#### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.20-3 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

### **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

#### **6.1 Decontamination Verification Sampling Activities**

Decontamination verification sampling activities will be conducted at the permitted unit in order to verify that surfaces and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from the floor and from the wall (up to 11 ft) of the permitted unit. These verification wipe samples will be collected from random locations within each of the sample areas indicated on Figure G.20-1 (provided under separate cover) of this closure plan and analyzed for the hazardous waste constituents listed in Table G.20-1. A total of four wipe samples will be collected: one from the floor; one from each of the pillars; and one from the wall.

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Wipe Sampling**

Surface wipe samples will be used to determine if residual hazardous constituents remain on the surfaces and related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.2 Solid Chip Sampling**

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit. Any non-porous inclusions from the sampling location will be removed by brushing or wiping. Using a chisel, drill, hole saw, or similar tool, a minimum 100 grams of the sample will be collected to a depth of 2 cm, or to an alternate depth specified in the assessment and transferred to an appropriate sampling container. The holding time and the preservation techniques to be used for each analysis will be determined from Table G.20-5.

### **6.2.3 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross-contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

## **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed chain-of-custody form to the Facility and it will become part of the permanent sampling record documenting the sampling efforts.

#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

#### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.20-5 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

#### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish the requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, wastes, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization, unless the shipper is specifically authorized through formal documentation by the packaging and transportation organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history (*see* Table G.20-1). Table G.20-1 will be modified, as necessary, to incorporate changes as a result of the permitted unit's records review. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.20-4. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.20-4. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2. This analytical laboratory will have:

- a. a documented comprehensive QA/QC program;
- b. technical analytical expertise;
- c. a document control and records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.20-4 is based on the following considerations:

- e. the physical form of the waste;
- f. constituents of concern;
- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contamination associated with the sampling and analysis process, and is described in the following sections, along with information on calculations necessary to evaluate the QC results.

#### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.20-6 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted

to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

#### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe sample preparations that occur during the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

### **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials; these wastes are listed with potential disposal options in Table G.20-3 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.4-3, will be containerized and managed as waste.

### **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## 9.0 REFERENCES

- DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.
- EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.
- EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, DC.
- NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.



**Table G.20-1**

**Hazardous Waste Constituents of Concern at the Technical Area 55, Building 4, Room B05, Indoor  
Container Storage Unit<sup>a</sup>**

Category	EPA Hazardous Waste Numbers	Specific Constituents
Toxic Metals	D004, D005, D006, D007, D008, D009, D010, D011  F006  P120	Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver  Wastewater treatment sludge  Vanadium pentoxide
Organic Compounds	D018, D019, D021, D022, D027, D028, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D042, D043  F001, F002, F003, F004, F005	Benzene, Carbon tetrachloride, Chlorobenzene, Chloroform, 1,4-Dichlorobenzene, 1,2-Dichloroethane, 2,4-Dinitrotoluene, Hexachlorobenzene, Hexachlorobutadiene, Hexachloroethane, Methyl ethyl ketone, Nitrobenzene, Pentachlorophenol, Pyridine, Tetrachloroethylene, Trichloroethylene, 2,4,6-Trichlorophenol, Vinyl chloride  1,1,1-Trichloroethane, Carbon tetrachloride, Chlorinated fluorocarbons, Methylene chloride, Tetrachloroethylene, Trichloroethylene, Trichlorofluoroethane, 1,1,1-Trichloroethane, 1,1,2-Trichloro-1,2,2-trifluoroethane, 1,1,2-Trichloroethane, Chlorobenzene, Freon tf, Methyl chloride, Methylene chloride, Ortho-dichlorobenzene, Tetrachloroethylene, Trichloroethylene, Trichlorofluoromethane, Acetone, Ethyl ether, Methanol, Methyl isobutyl ketone, n-Butyl alcohol, Xylene, Cresols, Cresylic acid, Nitrobenzene, 2-Ethoxyethanol, 2-Nitropropane, Benzene, Carbon disulfide, Isobutanol, Methyl ethyl ketone, Pyridine, Toluene  Acetone, Acetonitrile, Benzene, Chloroform, Methylene chloride, Dimethyl sulfate, 1, 4 - Dioxane, Pyridine, Tetrahydrofuran, Toluene

	U002, U003, U019, U044, U080, U103, U108, U196, U213, U220	
Cyanides	F007, F009  P030, P098, P099, P106	Cyanide plating bath solutions, Cyanide stripping cleaning solutions  Cyanides (Soluble salts and complexes), Potassium cyanide, Potassium silver cyanide, Sodium cyanide

<sup>a</sup> Based on the permitted unit's Operating Record

**Table G.20-2**

**Closure Schedule for the Technical Area 55, Building 4, Room B05, Indoor Container Storage Unit**

Activity	Maximum Time Required <sup>a</sup>
Notify the Department of intent to close.	-45 Days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.20-3**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.

**Table G.20-3**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
		disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded concrete	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill, recycled, or reused
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Discarded waste management equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Sampling equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.

**Table G.20-3**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

**Table G.20-4**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
Metal Analysis				
Arsenic	7060A <sup>c</sup> , 7061A	FLAA, GFAA	10 ug/L	Determine the metal concentration in the samples.
Barium	7080A <sup>d</sup> , 7081 <sup>c</sup>	FLAA,GFAA	200 ug/L	
Cadmium	7130 <sup>d</sup> , 7131A <sup>c</sup>	FLAA, GFAA	2 ug/L	
Chromium	7190 <sup>d</sup> , 7191 <sup>c</sup>	FLAA, GFAA	10 ug/L	
Lead	7420 <sup>d</sup> , 7421 <sup>c</sup>	FLAA, GFAA	5 ug/L	
Mercury	7470A, 7471A <sup>e</sup>	CVAA	0.2 ug/L	
Selenium	7740 <sup>c</sup> , 7741A	FLAA, GFAA	5 ug/L	
Silver	7760A <sup>d</sup> , 7761 <sup>c</sup>	FLAA, GFAA	10 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.
Target compound list SVOCs plus 20 TICs	8270D <sup>c</sup>	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

<sup>c</sup> Method being integrated into Method 7010, per the May 1998 SW-846 Draft Update IVA.

<sup>d</sup> Method being integrated into Method 7000B, per the May 1998 SW-846 Draft Update IVA.

<sup>e</sup> Method being revised to 7471B per the May 1998 SW-846 Draft Update IVA.

CVAA = Cold-vapor atomic absorption spectroscopy; GC/MS = Gas chromatography/mass spectrometry

FLAA = Flame atomic absorption spectroscopy; GFAA = Graphite furnace atomic absorption spectroscopy

mg/L = milligrams per liter; ug/L = micrograms per liter.

**Table G.20-5**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
TCLP/Total Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
TCLP/Total Mercury	Aqueous Media:  500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon- Lined Septa	Solid Media  Cool to 4 °C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	



<i>Semi-Volatile Organic Compounds</i>			
Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to extraction. 40 days from extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4 °C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HCl = hydrochloric acid

mL = milliliter

HNO<sub>3</sub> = nitric acid

L = Liter

TCLP = Toxicity Characteristic Leaching Procedure

**Table G.20-6**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

<b>QC Sample Type</b>	<b>Applicable Analysis<sup>a</sup></b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (*e.g.*, methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.

**Figure G.20-1 has been provided under separate cover**

**ATTACHMENT G.21**  
**TECHNICAL AREA 55, BUILDING 4, ROOM B45**  
**INDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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<u>FIGURE NO.</u>	<u>TITLE</u>
G.21-1	Technical Area 55, Building 4, Room B45, Indoor Container Storage Unit Sampling Locations



## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the indoor hazardous waste container storage unit which is located in Room B45 in the basement of Technical Area 55, Building 4 (TA-55-4) at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9, the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The entire floor of the permitted unit has been used for storage of hazardous waste. The permitted unit is rectangular shaped, measures 45 feet (ft), 1 inch (in) long by 17 ft, 7 in wide, and is open on three sides. The waste stored at the permitted unit consists of hazardous waste in solid form. The permitted unit was constructed in 1979 and has been subject to hazardous waste management regulations under RCRA since July 25, 1990. Due to the scope of process operations at TA-55-4, the wastes stored include sludge, debris, and chemical wastes with metals and volatile and semi-volatile organic constituents. Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include information regarding waste management procedures and hazardous waste constituents stored at the permitted unit.

## 3.0 ESTIMATE OF MAXIMUM WASTE STORED

Approximately 331 cubic meters of waste has been stored in the permitted unit. Throughout the life of this Permit it is estimated that an additional 184 cubic meters of waste will be stored in the permitted unit.

## 4.0 GENERAL CLOSURE REQUIREMENTS

### 4.1 Closure Performance Standard

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and

- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I for container storage units.

Closure of the permitted unit will be deemed complete when: 1) all surfaces and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

#### 4.2 Closure Schedule

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table 21-2 of this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 § CFR 264.112(d)(1)) and closure activities will begin according to the requirements of 40 § CFR 264.112(d)(2)). However, pursuant to 40 CFR § 264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Decontamination verification sampling activities, and soil sampling if applicable, will be conducted to demonstrate that surfaces, related equipment, and media, if applicable, at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated equipment associated with the permitted unit; verification that the closure performance standards have been achieved; and submittal of a final closure certification report. The following sections describe closure activities applicable to the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous wastes will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any previous finding(s) or action(s) that may influence closure activities or potential sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed as outlined in Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of spills or chronic conditions identified in the Operating and Inspection Records).

#### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the floor and wall at the permitted unit for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and the

applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

### **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents will be removed from the permitted unit. The permitted unit's surfaces and related equipment will be decontaminated, or removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*), Permit Section 9.4.5, and Facility waste management procedures. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous constituents from the permitted unit to meet the closure performance standards outlined in Permit Section 9.2.

#### **5.3.1 Removal of Structures and Related Equipment**

All structures and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan. At this time, there is no equipment identified for removal from the unit; however, if equipment is identified during the assessment, it will be removed and disposed of in accordance with Permit Section 9.4.3.2.

#### **5.3.2 Decontamination of Structures and Related Equipment**

All surfaces and related equipment that will be left in place or reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. At this time there is no equipment located at the permitted unit that is expected to be left in place; however, if there is equipment identified during the assessment, it will be decontaminated in accordance with this section.

Decontamination of the permitted unit will be conducted by first removing loose material (*e.g.*, dust, dirt) through sweeping followed by washing using a manual wipe-down method with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water mixed in accordance with the manufacturer's recommendations.

Wipe-down washing will be utilized because of the need to minimize the potential for exposure to workers and the migration of cleaning solution to other areas of the basement outside the permitted unit's boundary. Migration of the wash solution (in the form of splashing, condensation, or drainage) from steam cleaning or pressure washing may potentially contaminate or otherwise negatively affect ongoing operations within the basement. Migration can potentially be mitigated using plastic barriers taped to surfaces to enclose the area. However, areas enclosed in this manner will require workers to use additional personal protective equipment (PPE). This PPE will include fully enclosed protective wear and supplied air because of the increased risk of exposures to personnel due to potential release of radiological materials and organic compounds within the enclosure. Enclosure of the area increases the risk of personnel exhaustion, because of the additional PPE, and the potential for workers to reach radiological work exposure limits. Therefore, wipe-down washing, rather than steam cleaning or pressure washing, will be utilized because of the need to minimize the potential for exposure to workers and the migration of cleaning solution to other areas of the basement outside the permitted unit's boundary.

The entirety of the unit's floor will be decontaminated. Hazardous waste containers at the permitted unit are stacked. Including the height of any pallets that may have been used, two stacked 55-gallon drums and two stacked standard waste boxes measure just over eight feet high, respectively. Therefore, to ensure that decontamination of the wall is conducted to a sufficient height, it will be decontaminated to a height of 11 feet.

Ceilings of the permitted unit, walls above 11 feet, and the areas outside of the permitted unit will be presumed to be free of contamination unless there is some indication of contamination, the records review reveals that large amounts of liquid volatile or semi-volatile organic waste was stored in the permitted unit, or a spill or release occurred within the permitted unit that could have affected the ceiling or the walls above the height of 11 feet.

Cloths, or other absorbent cleaning devices, will not be reused to wipe down the surfaces after being wetted in the wash solution or after spraying solution onto the surfaces. Only one cloth or absorbent cleaning device will be used at a time in a single area to prevent cross-contamination. To minimize the amount of liquid waste generated as a result of decontamination activities, the wash solution will be dispersed from buckets, spray bottles, or other types of small containers.

Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess water and provide containment during the decontamination process.

#### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.21-3 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

### **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

#### **6.1 Decontamination Verification Sampling Activities**

Decontamination verification sampling activities will be conducted at the permitted unit in order to verify that surfaces and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from the floor and from the wall of the permitted unit. The verification wipe samples will be collected from random locations within each of the sample areas indicated on Figure G.21-1 (provided under separate cover) of this closure plan. A total of four wipe samples will be collected: two from the

floor; and two from the wall. The samples will be analyzed for the hazardous waste constituents listed in Table G.18-1.

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with the Permit Section 9.4.7.1 and the procedures identified in this SAP which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on the surfaces, structures, and related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.2 Solid Chip Sampling**

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit. Any non-porous inclusions from the sampling location will be removed by brushing or wiping. Using a chisel, drill, hole saw, or similar tool, a minimum 100 grams of the sample will be collected to a depth of 2 cm, or to an alternate depth specified in the assessment and transferred to an appropriate sampling container. The holding time and the preservation techniques to be used for each analysis will be determined from Table G.21-5.

### **6.2.3 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross-contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

### **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

#### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

##### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed chain-of-custody form to the Facility and it will become part of the permanent sampling record documenting the sampling efforts.

##### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

#### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.21-5 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

#### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish the requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, wastes, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation



organization, unless the shipper is specifically authorized through formal documentation by the packaging and transportation organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all the hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history (*see* Table G.21-1). Table G.21-1 will be modified, as necessary, to incorporate changes as a result of the permitted unit's records review. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.21-4. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.21-4. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2. The analytical laboratory will have:

- a. a documented comprehensive QA/QC program;
- b. technical analytical expertise;
- c. a document control and records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.21-4 is based on the following considerations:

- e. the physical form of the waste;
- f. constituents of concern;
- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contamination associated with the sampling and analysis process, and is described in the following sections, along with information on calculations necessary to evaluate the QC results.

#### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.21-6 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

#### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

### **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials: these wastes are listed with potential disposal options in Table G.21-3 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.21-3, will be containerized and managed as waste.

## **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## **9.0 REFERENCES**

- DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.
- EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.
- EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, DC.
- NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.

**Table G.21-1**  
**Hazardous Waste Constituents of Concern at the Technical Area 55, Building 4, Room B45, Indoor**  
**Container Storage Unit<sup>a</sup>**

Category	EPA Hazardous Waste Numbers	Specific Constituents
Toxic Metals	D004, D005, D006, D007, D008, D009, D010, D011  F006  P120	Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver  Wastewater treatment sludge  Vanadium pentoxide
Organic Compounds	D018, D019, D021, D022, D027, D028, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D042, D043      F001, F002, F003, F004, F005	Benzene, Carbon tetrachloride, Chlorobenzene, Chloroform, 1,4-Dichlorobenzene, 1,2-Dichloroethane, 2,4-Dinitrotoluene, Hexachlorobenzene, Hexachlorobutadiene, Hexachloroethane, Methyl ethyl ketone, Nitrobenzene, Pentachlorophenol, Pyridine, Tetrachloroethylene, Trichloroethylene, 2,4,6-Trichlorophenol, Vinyl chloride  1,1,1-Trichloroethane, Carbon tetrachloride, Chlorinated fluorocarbons, Methylene chloride, Tetrachloroethylene, Trichloroethylene, Trichlorofluoroethane, 1,1,1-Trichloroethane, 1,1,2-Trichloro-1,2,2-trifluoroethane, 1,1,2-Trichloroethane, Chlorobenzene, Freon tf, Methyl chloride, Methylene chloride, Ortho-dichlorobenzene, Tetrachloroethylene, Trichloroethylene, Trichlorofluoromethane, Acetone, Ethyl ether, Methanol, Methyl isobutyl ketone, n-Butyl alcohol, Xylene, Cresols, Cresylic acid, Nitrobenzene, 2-Ethoxyethanol, 2-Nitropropane, Benzene, Carbon disulfide, Isobutanol, Methyl ethyl ketone, Pyridine, Toluene  Acetone, Acetonitrile, Benzene, Chloroform, Methylene chloride, Dimethyl sulfate, 1, 4 -Dioxane, Pyridine, Tetrahydrofuran, Toluene

	U002, U003, U019, U044, U080, U103, U108, U196, U213, U220	
Cyanides	F007, F009  P030, P098, P099, P106	Cyanide plating bath solutions, Cyanide stripping cleaning solutions  Cyanides (Soluble salts and complexes), Potassium cyanide, Potassium silver cyanide, Sodium cyanide

<sup>a</sup>Based on the permitted unit's Operating Record

**Table G.21-2**

**Closure Schedule for the Technical Area 55, Building 4, Room B45, Indoor Container Storage Unit**

Activity	Maximum Time Required
Notify the Department of intent to close.	-45 Days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.21-3**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste

Potential Waste Materials	Waste Types	Disposal Options
		disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded concrete	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill, recycled, or reused
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Discarded waste management equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Sampling equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill



Potential Waste Materials	Waste Types	Disposal Options
		or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

**Table G.21-4**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
Metal Analysis				
Arsenic	7060A <sup>c</sup> , 7061A	FLAA, GFAA	10 ug/L	Determine the metal concentration in the samples.
Barium	7080A <sup>d</sup> , 7081 <sup>c</sup>	FLAA,GFAA	200 ug/L	
Cadmium	7130 <sup>d</sup> , 7131A <sup>c</sup>	FLAA, GFAA	2 ug/L	
Chromium	7190 <sup>d</sup> , 7191 <sup>c</sup>	FLAA, GFAA	10 ug/L	
Lead	7420 <sup>d</sup> , 7421 <sup>c</sup>	FLAA, GFAA	5 ug/L	
Mercury	7470A, 7471A <sup>e</sup>	CVAA	0.2 ug/L	
Selenium	7740 <sup>c</sup> , 7741A	FLAA, GFAA	5 ug/L	
Silver	7760A <sup>d</sup> , 7761 <sup>c</sup>	FLAA, GFAA	10 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.
Target compound list SVOCs plus 20 TICs	8270D <sup>c</sup>	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

<sup>c</sup> Method being integrated into Method 7010, per the May 1998 SW-846 Draft Update IVA.

<sup>d</sup> Method being integrated into Method 7000B, per the May 1998 SW-846 Draft Update IVA.

<sup>e</sup> Method being revised to 7471B per the May 1998 SW-846 Draft Update IVA.

CVAA = Cold-vapor atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy; mg/L = milligrams per liter; ug/L = micrograms per liter

GC/MS = Gas chromatography/mass spectrometry; GFAA = Graphite furnace atomic absorption spectroscopy

**Table G.21-5**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
TCLP/Total Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
TCLP/Total Mercury	Aqueous Media:  500-mL Wide Mouth- Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon- Lined Septa	Solid Media  Cool to 4 °C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	

<i>Semi-Volatile Organic Compounds</i>			
Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to extraction. 40 days from extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4 °C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HCl = hydrochloric acid

mL = milliliter

HNO<sub>3</sub> = nitric acid

L = Liter

TCLP = Toxicity Characteristic Leaching Procedure

**Table G.21-6**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

<b>QC Sample Type</b>	<b>Applicable Analysis <sup>a</sup></b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (e.g., methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.

**Figure G.21-1 has been provided under separate cover**

**ATTACHMENT G.22**  
**TECHNICAL AREA 55, BUILDING 4, VAULT**  
**INDOOR CONTAINER STORAGE UNIT**  
**CLOSURE PLAN**

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<u>FIGURE NO.</u>	<u>TITLE</u>
G.22-1	Technical Area 55, Building 4, Vault, Indoor Container Storage Unit Sampling Locations

## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the indoor hazardous waste container storage unit which is located in the Vault in the basement of Technical Area 55, Building 4 (TA-55-4) at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9, the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below. The permitted unit is irregularly shaped and has only one access door. It contains multiple rooms and each room has multiple lockers; hazardous waste has been stored only in Rooms A and H.

The waste stored at the permitted unit consists of hazardous waste in both solid and liquid form. The permitted unit was constructed in 1979 and has been subject to hazardous waste management regulations under RCRA since July 25, 1990. Due to the scope of process operations at TA-55-4, the wastes stored include corrosive liquids, debris, and chemical wastes with metals and volatile organic constituents. Specific hazardous waste constituents managed are included in Table G.22-1.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include additional information regarding waste management procedures and hazardous waste constituents stored at the permitted unit.

## 3.0 ESTIMATE OF MAXIMUM WASTE STORED

Approximately six gallons of waste has been stored in the permitted unit. Throughout the life of this Permit it is estimated that an additional 60 gallons of waste will be stored in the permitted unit.

## 4.0 GENERAL CLOSURE REQUIREMENTS

### 4.1 Closure Performance Standard

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and I for container storage units.

Closure of the permitted unit will be deemed complete when: 1) all surfaces and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

## 4.2 Closure Schedule

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.22-2 in this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 § CFR 264.112(d)(1)) and closure activities will begin according to the requirements of 40 § CFR 264.112(d)(2)). However, pursuant to 40 CFR §264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, the Permittees will conduct the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Decontamination verification sampling activities, and soil sampling if applicable, will be conducted to demonstrate that surfaces, related equipment, and media, if applicable, at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe closure activities applicable to the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous wastes will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any previous finding(s) or action(s) that may influence closure activities or potential sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed as outlined in Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and
- b. confirm additional sampling locations (*e.g.*, locations of spills or chronic conditions identified in the Operating and Inspection Records).

#### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the floor and walls for any existing cracks or conditions that indicate a potential for release of constituents. Floors, walls, and equipment within the permitted unit will be assessed for evidence of release. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see*

Section 6.0 of this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

### **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents will be removed from the permitted unit. The permitted unit's surfaces and related equipment will be decontaminated, or removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*), Permit Section 9.4.5, and Facility waste management procedures. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous constituents from the permitted unit to meet the closure performance standards outlined in Permit Section 9.2.

#### **5.3.1 Removal of Structures and Related Equipment**

All surfaces and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan. The metal lockers located within the permitted unit will be removed before the structural assessment.

#### **5.3.2 Decontamination of Structures and Related Equipment**

All surfaces and related equipment that will be left in place or reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. There is no equipment located at the permitted unit that is expected to be left in place; however, if there is equipment identified during the assessment that is expected to be left in place, it will be decontaminated in accordance with this section.

Decontamination of the permitted unit will be conducted by first removing loose material (*e.g.*, dust, dirt) through sweeping followed by washing using a manual wipe-down method with a solution consisting of a surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water mixed in accordance with the manufacturer's recommendations.

Wipe-down washing will be utilized because of the need to minimize the potential for exposure to workers and the migration of cleaning solution to other areas of the basement outside the permitted unit's boundary. Migration of the wash solution (in the form of splashing, condensation, or drainage) from steam cleaning or pressure washing may potentially contaminate or otherwise negatively affect ongoing operations within the basement. Migration can potentially be mitigated using plastic barriers taped to surfaces to enclose the area. However, areas enclosed in this manner will require workers to use additional personal protective equipment (PPE). This PPE will include fully enclosed protective wear and supplied air because of the increased risk of exposure to personnel due to potential releases of radiological materials and organic compounds within the enclosure. Enclosure of the area increases the risk of personnel exhaustion, because of the additional PPE, and the potential for workers to reach radiological work exposure limits. Therefore, wipe-down washing, rather than steam cleaning or pressure washing, will be utilized because of the need to minimize the potential for exposure to workers and the migration of cleaning solution to other areas of the basement outside the permitted unit's boundary.

The entirety of the unit's floors will be decontaminated. To ensure that decontamination of the walls is conducted to a sufficient height, all walls in the permitted unit will be decontaminated to a height of 11 feet. Ceilings of the permitted unit, walls above 11 feet, and the areas outside of the permitted unit will

be presumed to be free of contamination unless there is some physical indication of contamination (*e.g.*, staining), the records review reveals that large amounts of liquid volatile and semi-volatile organic waste was stored in the permitted unit, or a spill or release occurred within the permitted unit that could have affected the ceiling or the walls above the height of 11 feet.

Cloths, or other absorbent cleaning devices, will not be reused to wipe down the surfaces after being wetted in the wash solution or after spraying solution onto the surfaces. Only one cloth or absorbent cleaning device will be used at a time in a single area to prevent cross-contamination. To minimize the amount of liquid waste generated as a result of decontamination activities, the wash solution will be dispersed from buckets, spray bottles, or other types of small containers.

Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

#### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.22-3 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

### **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

#### **6.1 Decontamination Verification Sampling Activities**

Decontamination verification sampling activities will be conducted at the permitted unit in order to verify that surfaces and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least 18 wipe samples; eight wipe samples from the floor, one from each of the shorter walls (up to 11 feet), and four from each of the longer walls (up to 11 feet). Verification samples will be collected from random locations within each of the sample areas indicated on Figure G.22-1 (provided under separate cover).

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit.

#### **6.2 Sample Collection Procedures**

Samples will be collected in accordance with Permit Section 9.4.7.1 and the procedures identified in this sampling and analysis plan which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.



### **6.2.1 Wipe Sampling**

Surface wipe samples will be used to determine if residual hazardous constituents remain on equipment and surfaces at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.2 Solid Chip Sampling**

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit. Any non-porous inclusions from the sampling location will be removed by brushing or wiping. Using a chisel, drill, hole saw, or similar tool, a minimum 100 grams of the sample will be collected to a depth of 2 cm, or to an alternate depth specified in the assessment and transferred to an appropriate sampling container. The holding time and the preservation techniques to be used for each analysis will be determined from Table G.25-5.

### **6.2.3 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross-contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper. Residue, disposable decontamination equipment, and reusable decontamination equipment that cannot be decontaminated will be containerized and managed appropriately at an approved on-site facility.

## **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession,
- b. in view of the person in possession, or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed chain-of-custody form to the Facility and it will become part of the permanent sampling record documenting the sampling efforts.

#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location(s) from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line and the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location,
- b. suspected composition,

- c. sample identification number,
- d. volume/mass of sample taken,
- e. purpose of sampling,
- f. description of sample point and sampling methodology,
- g. date and time of collection,
- h. name of the sample collector,
- i. sample destination and how it will be transported,
- j. observations, and
- k. name(s) of personnel responsible for the observations.

### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.22-5 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish the requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, wastes, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier; air carrier; or freight. All off-site transportation will be processed through the Facility packaging and transportation organization, unless the shipper is specifically authorized through formal documentation by the packaging and transportation organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for the appropriate hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history (*see* Table G.22-1). Table G.22-1 will be modified, as necessary, at the time of closure to incorporate changes based on the permitted unit's records review. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.22-4. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.22-4

#### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 7.4.2. The analytical laboratory will have:

- a. a documented comprehensive QA/QC program;
- b. technical analytical expertise;
- c. a document control and records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.22-4 is based on the following considerations:

- e. the physical form of the waste;
- f. constituents of concern;
- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

#### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods” (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contamination associated with the sampling/analysis process, and is described in the following sections, along with information on calculations necessary to evaluate the QC results. QA/QC samples will be collected in accordance with the most recent and appropriate Facility sampling plan incorporating guidance from the EPA (EPA, 2002) and DOE (DOE, 1995), or other approved procedures.

##### **6.4.2.1 Field Quality Control**

The field QC samples that may be collected include trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.22-6 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

##### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

## **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials, which are listed with potential disposal options in Table G.22-3 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and small reusable equipment that cannot be decontaminated, as summarized in Table G.22-3, will be containerized and managed as waste.

## **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## **9.0 REFERENCES**

DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.

EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.

EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, DC.

NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.

**Table G.22-1**  
**Hazardous Waste Constituents of Concern at the Technical Area 55, Building 4, Vault Indoor**  
**Container Storage Unit<sup>a</sup>**

Category	EPA Hazardous Waste Numbers	Specific Constituents
Toxic Metals	D004, D005, D006, D007, D008, D009, D010, D011	Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
Organic Compounds	D018, D019, D021, D022, D035, D038, D039, D040  F001, F002, F005, F006	Benzene, Carbon Tetrachloride, Chlorobenzene, Chloroform, Methyl ethyl ketone, Pyridine, Tetrachloroethylene Trichloroethylene  Tetrachloroethylene, Trichloroethylene, Methylene chloride, 1,1,1-Trichloroethane, Carbon tetrachloride, Chlorinated fluorocarbons, Chlorobenzene, Pyridine, 1,1,2-Trichloro- 1,2,2-trifluoroethane, Ortho-dichlorobenzene, Trichlorofluoromethane, and 1,1,2-Trichloroethane, Toluene, Methyl ethyl ketone, Carbon disulfide, Isobutanol, Benzene, 2-Ethoxyethanol, 2-Nitropropane

<sup>a</sup>Based on the unit Operating Record

**Table G.22-2**

**Closure Schedule for the Technical Area 55, Building 4, Vault Indoor Container Storage Unit**

<b>Activity</b>	<b>Maximum Time Required</b>
Notify the Department of intent to close.	-45 Days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Submit final report to the Department.	Day 180



**Table G.22-3**  
**Waste Materials, Waste Types, and Disposal Options**

Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.

**Table G.22-3**

**Waste Materials, Waste Types, and Disposal Options**

<b>Waste Materials</b>	<b>Waste Types</b>	<b>Disposal Options</b>
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded concrete	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill, recycled, or reused
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Discarded waste management equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Sampling equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.

**Table G.22-3**

**Waste Materials, Waste Types, and Disposal Options**

<b>Waste Materials</b>	<b>Waste Types</b>	<b>Disposal Options</b>
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

**Table G.22-4**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
Metal Analysis				
Arsenic	7060A <sup>c</sup> , 7061A	FLAA, GFAA	10 ug/L	Determine the metal concentration in the samples.
Barium	7080A <sup>d</sup> , 7081 <sup>c</sup>	FLAA,GFAA	200 ug/L	
Cadmium	7130 <sup>d</sup> , 7131A <sup>c</sup>	FLAA, GFAA	2 ug/L	
Chromium	7190 <sup>d</sup> , 7191 <sup>c</sup>	FLAA, GFAA	10 ug/L	
Lead	7420 <sup>d</sup> , 7421 <sup>c</sup>	FLAA, GFAA	5 ug/L	
Mercury	7470A, 7471A <sup>e</sup>	CVAA	0.2 ug/L	
Selenium	7740 <sup>c</sup> , 7741A	FLAA, GFAA	5 ug/L	
Silver	7760A <sup>d</sup> , 7761 <sup>c</sup>	FLAA, GFAA	10 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

<sup>c</sup> Method being integrated into Method 7010, per the May 1998 SW-846 Draft Update IVA.

<sup>d</sup> Method being integrated into Method 7000B, per the May 1998 SW-846 Draft Update IVA.

<sup>e</sup> Method being revised to 7471B per the May 1998 SW-846 Draft Update IVA.

CVAA = Cold-vapor atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy

GC/MS = Gas chromatography/mass spectrometry

GFAA = Graphite furnace atomic absorption spectroscopy

mg/L = milligrams per liter ; ug/L = micrograms per liter.

**Table G.22-5**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
TCLP/Total Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media: 500-mL Wide Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media: HNO <sub>3</sub> to pH <2 Cool to 4 °C	180 Days
	Solid Media: 125-mL Glass	Solid Media: Cool to 4 °C	
TCLP/Total Mercury	Aqueous Media: 500-mL Wide Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media: HNO <sub>3</sub> to pH <2 Cool to 4 °C	28 Days
	Solid Media: 125-mL Glass	Solid Media: Cool to 4 °C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media: Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media: HCl to pH<2 Cool to 4 °C	14 days
	Solid Media: 125-mL Glass or Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Solid Media Cool to 4 °C Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HCl = hydrochloric acid

mL = milliter

HNO<sub>3</sub> = nitric acid

L = Liter

TCLP = Toxicity Characteristic Leaching Procedure

**Table G.22-6**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

<b>QC Sample Type</b>	<b>Applicable Analysis <sup>a</sup></b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC, metals	One sample daily	Not Applicable

<sup>a</sup> For VOC analysis, if blank shows detectable levels of any common laboratory contaminant (*e.g.*, methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.

**Figure G.22-1 has been provided under separate cover.**

**ATTACHMENT G.24**  
**TECHNICAL AREA 55, BUILDING 4, ROOM 401**  
**INDOOR MIXED WASTE STABILIZATION TREATMENT UNIT**  
**CLOSURE PLAN**



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G.24-4	Sample Containers, Preservation Techniques, and Holding Times
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<u>FIGURE NO.</u>	<u>TITLE</u>
G.24-1	Technical Area 55, Building 4, Room 401, Indoor Mixed Waste Tank Treatment

## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the indoor hazardous waste treatment unit called the 'Mixed Waste Stabilization Unit' which is located in Room 401 at Technical Area 55, Building 4 (TA-55-4) at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Section 9, the Code of Federal Regulations (CFR), Title 40, Part 264, Subpart G and X for hazardous waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit (as well as its components) can be found in Permit Attachment A (*Technical Area Unit Descriptions*). The permitted unit has been used for treatment of mixed waste and is located in Room 401 at TA-55-4. Room 401 is recessed 2.5 inches and has a square footage of 4,500 square feet. The permitted unit is located in glovebox GB-454 along the west wall of Room 401. It consists of a pH column, vacuum trap, two motor-driven mixers, four impellers, piping and the glovebox.

The waste typically treated at the permitted unit consists generally of mixed waste in liquid and solid form. The permitted unit has been in operation since 1987 and has been subject to waste management regulations under RCRA since July 25, 1990. The unit is used to treat liquid and solid mixed waste generated primarily from research and development activities and processing and recovery operations at TA-55 and at the Chemistry and Metallurgy Research Building at TA-3. The liquid wastes consist of evaporator bottoms solutions and laboratory solutions that exhibit the hazardous characteristics of corrosivity and toxicity (for metals) as defined in 20.4.1 NMAC §261.22 and 261.24 [6-14-00], respectively. The solid process wastes consist of process residue from the evaporator and filter cake. These waste streams exhibit the hazardous characteristics of toxicity (for metals) and corrosivity and are classified as mixed waste.

Permit Part 4 (*TA-55 Storage in Tanks and Treatment by Stabilization*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include additional information regarding waste management procedures and hazardous waste constituents treated at the permitted unit.

## 3.0 ESTIMATE OF MAXIMUM WASTE TREATED

Approximately 27,824 liters of waste have been treated in the permitted unit. Throughout the life of this Permit it is estimated that an additional 11,000 liters of waste will be treated in the permitted unit.

## 4.0 GENERAL CLOSURE REQUIREMENTS

### 4.1 Closure Performance Standard

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (*Closure*) and 40 CFR Part 264 Subparts G and X for tank units.

Closure of the permitted unit will be deemed complete when: 1) all surfaces and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by the Department.

### 4.2 Closure Schedule

This closure plan schedule is intended to address closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.24-1 of this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR 264.112(d)(2). However, pursuant to 40 CFR § 264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste the Permittees will conduct the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification if necessary. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit surfaces and related equipment.

Decontamination verification sampling activities, and soil sampling if applicable, will be conducted to demonstrate that surfaces, related equipment, and media, if applicable, at the permitted unit meet the closure performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will include: removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated structures and equipment associated with the permitted unit; verification that the closure performance standards in Permit Section 9.2 have been achieved; and submittal of a final closure certification report. The following sections describe closure activities applicable to the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous wastes will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous wastes will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted units will be reviewed and an assessment will be conducted to determine any previous finding(s) or action(s) that may influence closure activities or potential sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed as outlined in Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and

- b. confirm additional sampling locations (*e.g.*, locations of spills or chronic conditions identified in the Operating and Inspection Records).

### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspecting the glovebox and the floor and walls of Room 401 for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

## **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents will be removed from the permitted unit. The permitted unit's surfaces, structures, and equipment will be decontaminated, removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*), Permit Section 9.4.5, and Facility waste management procedures. Decontamination activities will ensure the removal of all hazardous waste residues and hazardous constituents from the permitted unit to meet the closure performance standards as outlined in Permit Section 9.2.

### **5.3.1 Removal of Structures and Related Equipment**

All structures and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan. The pH column, vacuum trap, two motor-driven mixers, four impellers, piping and the glovebox and all other materials in Room 401 associated with the permitted unit will be removed before the structural assessment.

### **5.3.2 Decontamination of Structures and Related Equipment**

All structures and related equipment that will be left in place or reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. At this time there is no equipment located at the unit that is expected to be decontaminated; however, if equipment is identified during the assessment, it will be decontaminated in accordance with this section.

Decontamination of the surfaces of the permitted unit will include all features located directly below the unit. If a hazardous waste spill or release has occurred at the permitted unit, decontamination will be expanded to include all impacted surfaces within the room. The entirety of the unit's floors will be decontaminated. Walls up to 11 feet will be decontaminated; ceilings and walls above 11 feet will be presumed to be free of contamination unless there is some indication of contamination or a spill or release occurred that could have affected high on the walls or on the ceiling. Equipment and surfaces within the permitted unit will also be decontaminated.

Decontamination of the permitted unit will be conducted by first removing loose material (*e.g.*, dust, dirt) through sweeping followed by washing using a manual wipe-down method with a solution consisting of a



surfactant detergent (*e.g.*, Alconox<sup>®</sup>) and water mixed in accordance with the manufacturer's recommendations rather than steam cleaning or pressure washing.

Migration of the wash solution (in the form of splashing, condensation, or drainage) from steam cleaning or pressure washing may potentially contaminate or otherwise negatively affect ongoing operations in areas outside of TA-55-4 Room 401. Migration can potentially be mitigated using plastic barriers taped to surfaces to enclose the area. However, areas enclosed in this manner will require workers to use additional personal protective equipment (PPE). This PPE will include fully enclosed protective wear and supplied air because of the increased risk of exposure to personnel due to potential releases of radiological materials and organic compounds within the enclosure. Enclosure of the area increases the risk of personnel exhaustion, because of the additional PPE, and the potential for workers to reach radiological work exposure limits. Therefore, wipe-down washing, rather than steam cleaning or pressure washing will be utilized because of the need to minimize the potential for exposure to workers and the migration of cleaning solution to other areas outside of the permitted unit's boundary.

The quantity of the wash solution will be minimized by dispensing from buckets, spray bottles, or other types of small containers. Cloths, or other absorbent cleaning devices, will not be reused to wipe down the surfaces after being wetted in the wash solution or after spraying solution onto the surfaces. Only one cloth or absorbent cleaning device will be used at a time in a single area to prevent cross-contamination.

Portable berms or other such devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess wash water and provide containment during the decontamination process.

#### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.24-2 and in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan.

### **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

#### **6.1 Decontamination Verification Sampling Activities**

Decontamination verification sampling activities will be conducted at the permitted unit in order to verify that surfaces and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment at the permitted unit. In compliance with Permit Section 9.4.7.1.i, this closure plan will ensure the collection of at least one wipe sample from the floor and from the walls (up to 11 feet) of the permitted unit. Verification wipe samples will be collected from random locations within each of the sample areas indicated on Figure G.24-1

(provided under separate cover) of this closure plan. A total of eight wipe samples will be collected; four from the walls and four from the floor.

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with Permit Section 9.4.7.1 and the procedures identified in this sampling and analysis plan which incorporates guidance from the United States Environmental Protection Agency (USEPA) (EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on the surface and related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.2 Solid Chip Sampling**

Solid chip samples may be collected and analyzed to determine if residual hazardous constituents remain in the concrete floor at the permitted unit. Any non-porous inclusions from the sampling location will be removed by brushing or wiping. Using a chisel, drill, hole saw, or similar tool, a minimum 100 grams of the sample will be collected to a depth of 2 cm, or to an alternate depth specified in the assessment and transferred to an appropriate sampling container. The holding time and the preservation techniques to be used for each analysis will be determined from Table G.24-4.

### **6.2.3 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross-contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

## **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, sample handling, preservation, storage, packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. The analytical laboratory will return the completed chain-of-custody form to the Facility and it will become part of the permanent sampling record documenting the sampling efforts.

#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross-outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

#### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.24-4 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

#### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish the requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, wastes, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization unless the shipper is specifically authorized through formal documentation by the packaging and transportation organization to independently tender shipments to common motor or air carriers.

#### **6.4 Sample Analysis Requirements**

Samples will be analyzed for all hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been treated at the permitted unit over its operational history. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.24-3. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.24-3. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

##### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2. This analytical laboratory will have:

- a. a documented comprehensive QA/QC program;
- b. technical analytical expertise;
- c. a document control and records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.24-3 is based on the following considerations:

- e. the physical form of the waste;
- f. constituents of concern;
- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

##### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contamination associated with the sampling and analysis process, and is described in the following sections, along with information on calculations necessary to evaluate the QC results.

#### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.24-5 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

#### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe sample preparations that occur during the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

### **7.0 WASTE MANAGEMENT**

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials; these wastes are listed with potential disposal options in Table G.24-2 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.1-5, will be containerized and managed as waste.

## 8.0 CLOSURE CERTIFICATION REPORT

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## 9.0 REFERENCES

DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.

EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.

EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, DC.

NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.

**Table G.24-1**  
**Closure Schedule for the Technical Area 55, Building 4, Room 401 Indoor Mixed Waste Storage**  
**Treatment Unit**

<b>Activity</b>	<b>Maximum Time Required</b>
Notify the Department of intent to close.	-45 Days
Final receipt of waste.	Day 0
Complete waste removal	Day 90
Complete records review and structural assessment.	Day 100
Complete all closure activities and submit final closure certification report to the Department.	Day 180



**Table G.24-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.

**Table G.24-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded concrete	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill, recycled, or reused
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Discarded waste management equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
Sampling equipment	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill

**Table G.24-2**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
		or WIPP, as appropriate.
	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

**Table G.24-3**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
<i>Metal Analysis</i>				
Arsenic	7060A <sup>c</sup> , 7061A	FLAA, GFAA	10 ug/L	Determine the metal concentration in the samples.
Barium	7080A <sup>d</sup> , 7081 <sup>c</sup>	FLAA, GFAA	200 ug/L	
Cadmium	7130 <sup>d</sup> , 7131A <sup>c</sup>	FLAA, GFAA	2 ug/L	
Chromium	7190 <sup>d</sup> , 7191 <sup>c</sup>	FLAA, GFAA	10 ug/L	
Lead	7420 <sup>d</sup> , 7421 <sup>c</sup>	FLAA, GFAA	5 ug/L	
Mercury	7470A, 7471A <sup>e</sup>	CVAA	0.2 ug/L	
Selenium	7740 <sup>c</sup> , 7741A	FLAA, GFAA	5 ug/L	
Silver	7760A <sup>d</sup> , 7761 <sup>c</sup>	FLAA, GFAA	10 ug/L	

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Actual detection limits may be higher depending on sample composition and matrix type.

<sup>c</sup> Method being integrated into Method 7010, per the May 1998 SW-846 Draft Update IVA.

<sup>d</sup> Method being integrated into Method 7000B, per the May 1998 SW-846 Draft Update IVA.

<sup>e</sup> Method being revised to 7471B per the May 1998 SW-846 Draft Update IVA.

CVAA = Cold-vapor atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy

GFAA = Graphite furnace atomic absorption spectroscopy

ug/L = micrograms per liter.

**Table G.24-4**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
<i>Metals</i>			
TCLP/Total Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
TCLP/Total Mercury	Aqueous Media:  500-mL Wide Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HNO<sub>3</sub> = nitric acid

mL = milliliter

TCLP = Toxicity Characteristic Leaching Procedure

**Table G.24-5**

**Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

<b>QC Sample Type</b>	<b>Applicable Analysis</b>	<b>Frequency</b>	<b>Acceptance Criteria</b>
Field Blank	Metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>a</sup>	Metals	One sample daily	Not Applicable

<sup>a</sup> Collected only if reusable sampling equipment used

**Figure G.24-1:** Technical Area 55, Building 4, Room 401, Indoor Mixed Waste Tank Treatment Sampling Locations

**ATTACHMENT G.25**

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**ATTACHMENT G.26**  
**TECHNICAL AREA 55**  
**OUTDOOR STORAGE PAD**  
**CLOSURE PLAN**

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<u>FIGURE NO.</u>	<u>TITLE</u>
G.26-1	Technical Area 55 Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations

## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the outdoor hazardous waste container storage unit at the Technical Area 55 Outdoor Storage Pad at the Los Alamos National Laboratory (Facility), hereinafter referred to as the permitted unit. The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for hazardous waste container storage at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

Until closure is complete and has been certified in accordance with Permit Section 9.5, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the permitted unit, this closure plan may be amended in accordance with Permit Section 9.4.8, as necessary and appropriate, to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

A specific description of the permitted unit can be found in Permit Attachment A (*Technical Area Unit Descriptions*). Additional features and equipment located at the permitted unit and not discussed elsewhere within the Permit are described below.

The permitted unit is located northwest of TA-55-4 and is constructed of asphalt with a variable thickness of four to six inches (in.). It also has a steel building (TA-55-PF-190) situated on it. The permitted unit is trapezoid-shaped pad with dimensions of 102 feet (ft.), 86 ft., 156 ft., and 105 ft., respectively, on its four sides. The permitted unit is sloped, elevated approximately two to four in. above ground level, and has a culvert beneath the pad running from the northwest side to the southeast side to minimize run-on of precipitation.

Waste containments storage building TA-55-PF-190 is located on the south-eastern portion of the permitted unit and is used for storage of hazardous waste. It measures approximately 22 feet long and 8 feet 4 inches wide. The building is a manufactured steel building that is designed for hazardous waste storage.

The waste typically stored at the permitted unit consists generally of hazardous and mixed waste in both solid and liquid form. The unit was constructed and placed into use in 1979 and has been subject to waste management regulations under RCRA since July 25, 1990. Due to the scope of process operations at TA-55-4, the stored wastes include characteristic and listed waste, corrosive liquids, sludge, debris, and chemical wastes with metals and volatile and semi-volatile organic constituents. Specific Environmental Protection Agency (EPA) Hazardous Waste Numbers managed at the unit are included in Table G.26-1.

Permit Part 3 (*Storage in Containers*), Permit Attachment A (*Technical Area Unit Descriptions*), Permit Attachment B (*Part A Application*), and Permit Attachment C (*Waste Analysis Plan*) include further information about waste management procedures and hazardous waste constituents stored at the permitted unit.

### 3.0 ESTIMATE OF MAXIMUM WASTE STORED

Approximately 930 cubic meters of waste has been stored in the permitted unit. Throughout the life of this Permit it is estimated that an additional 700 cubic meters of waste will be stored in the permitted unit.

### 4.0 GENERAL CLOSURE INFORMATION

#### 4.1 Closure Performance Standard

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. For soils the cleanup levels shall be established based on residential use. The Permittees must also demonstrate that there is no potential to contaminate groundwater.

If the Permittees are unable to achieve either of the clean closure standards above, they must:

- c. control hazardous waste residues, hazardous constituents, and, as applicable, contaminated media such that they do not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target Hazard Index of 1.0 for human receptors, and meet Ecological Screening Levels established under Permit Section 11.5;
- d. minimize the need for further maintenance;
- e. control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground, groundwater, surface waters, or to the atmosphere; and
- f. comply with the closure requirements of Permit Part 9 (Closure) and 40 CFR Part 264 Subparts G and I for container storage units.

Closure of the unit will be deemed complete when: 1) all structures and related equipment have been decontaminated or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

#### 4.2 Closure Schedule

This closure plan schedule is intended to address the closure requirements for the permitted unit within the authorized timeframe of the current Hazardous Waste Facility Permit (*see* Permit Section 9.4). The following section provides the schedule of closure activities (*see also* Table G.26-1 of this closure plan).

Notification of closure will occur at least 45 days before the Permittees expect to begin closure (*see* 40 CFR § 264.112(d)(1)) and closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2). However, pursuant to 40 CFR §264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be



conducted at any time before or after notification of closure. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, shall occur in accordance with Permit Section 9.4.6.2.

Within 90 days after the final receipt of hazardous waste, the permitted unit will be emptied of all stored waste. Within ten days of completing hazardous waste removal or within 100 days of the final receipt of hazardous waste, the Permittees will complete the records review (review) and assessment and submit an amended closure plan, if necessary, to the Department for review and approval as a permit modification in accordance with Permit Section 9.4.8. Upon approval of the modified closure plan, if applicable, the Permittees will decontaminate unit structures and related equipment.

After decontamination, soil sampling and decontamination verification sampling will be conducted to demonstrate that media and related equipment at the permitted unit meet the performance standards in Permit Section 9.2.

All closure activities, including submittal of a final closure certification report to the Department for review and approval, will be completed within 180 days after the final receipt of waste. In the event that closure of the permitted unit cannot proceed according to schedule, the Permittees will notify the Department in accordance with the extension request requirements in Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

Closure activities at the permitted unit will involve removal of hazardous wastes; proper management and disposal of hazardous waste residues and contaminated equipment associated with the permitted unit; and verification that the closure performance standards have been achieved. The following sections describe closure activities applicable to the permitted unit.

### **5.1 Removal of Waste**

In accordance with Permit Section 9.4.2, all stored hazardous waste will be removed from the permitted unit scheduled for closure. Depending upon their size, containers will be removed with forklifts, container dollies, air pallets, or manually. Containers will be placed on flat bed trucks, trailers, or other appropriate vehicles for transport. Appropriate shipping documentation will accompany the wastes during transport. Containers holding hazardous waste will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

After waste removal and before starting closure decontamination and sampling activities, the Facility Operating and Inspection Records for the permitted unit will be reviewed and an assessment will be conducted to determine any previous finding(s) or action(s) that may influence closure activities or potential sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed as outlined in Permit Section 9.4.6.1. The goals of the review will be to:

- a. confirm the specific hazardous waste constituents of concern; and

- b. confirm additional sampling locations (*e.g.*, locations of spills or chronic conditions identified in the Operating and Inspection Records).

### **5.2.2 Structural Assessment**

An assessment of the permitted unit's physical condition will be conducted in accordance with Permit Section 9.4.6.2. The assessment will include inspection of the floors, walls, and ceiling of the steel building (TA\_55-PF-190), as well as inspecting the asphalt pad for any existing cracks or conditions that indicate a potential for, or an actual, release of constituents. If a crack, gap, or stained area is present, the Permittees will amend this closure plan in order to update the sampling and analysis plan (SAP) (*see* Section 6.0 of this closure plan) to add these sampling locations and the applicable sampling methods and procedures. This inspection will be documented with photographs and drawings, as necessary.

## **5.3 Decontamination and Removal of Structures Equipment**

In accordance with Permit Section 9.4.3, all remaining hazardous waste and hazardous waste residues will be removed from the permitted unit. The permitted unit's structures and equipment will be decontaminated, removed, or both and managed appropriately. All waste material will be controlled, handled, characterized, and disposed of in accordance with Permit Attachment C (*Waste Analysis Plan*) and Facility waste management procedures.

### **5.3.1 Removal of Structures and Related Equipment**

All structures and related equipment that are removed will not require decontamination, will be considered solid and potentially hazardous waste (as defined by this Permit) when removed, and will be disposed of in accordance with Permit Section 9.4.5 and Section 7.0 of this closure plan. The entire asphalt pad (including all materials associated with it such as any underlying base course or fill) will be removed after the structural assessment.

### **5.3.2 Decontamination of Structures and Related Equipment**

All structures and equipment that will be reused by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. At this time there is no equipment that is expected to be reused; however, if equipment or structures are identified during the assessment they will be decontaminated in accordance with this section. Decontamination of structures and equipment will be steam cleaned using water or pressure washed with a solution consisting of a surfactant detergent (*e.g.*, Alconox®) and water. Portable berms, other devices (*e.g.*, absorbent socks, plastic sheeting, wading pools, existing secondary containment) will collect excess water and provide containment during the decontamination process.

### **5.3.3 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during decontamination activities will be cleaned with a wash water solution. Residue, disposable equipment, and small reusable equipment that cannot be decontaminated will be containerized and managed as waste as summarized in Table G.26-3 and in accordance with Facility waste management procedures, depending on the regulated constituents present.

## **6.0 SAMPLING AND ANALYSIS PLAN**

This SAP addresses the specific closure sampling and analysis requirements in Permit Section 9.4.7 and describes the sampling, analysis, and quality assurance/quality control (QA/QC) methods that will be

used to demonstrate that the Permittees have met the closure performance standards outlined in Permit Section 9.2.

## **6.1 Soil Sampling and Decontamination Verification Wipe Sampling Activities**

Soil sampling and decontamination verification wipe sampling activities will be conducted to verify that soils, structures, and related equipment at the permitted unit meet the closure performance standards in Permit Section 9.2. All samples will be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan.

One wipe sample will be collected from each piece of decontaminated equipment. In compliance with Permit Section 9.4.7.1.ii, this closure plan will ensure the collection of 17 soil samples from the following locations:

- a. one sample at the known loading area (*see* Permit Section 9.4.7.1.ii(1));
- b. one soil sample every 900 square feet of the permitted unit for a total of 13 samples (*see* Permit Section 9.4.7.1.ii(2)); and
- c. three samples to address stormwater runoff (*see* Permit Section 9.4.7.1.ii(3)).

Figure G.26-1 illustrates these sampling locations.

At the time of sampling, the precise locations of the grid samples will be randomly selected within each 900 square foot sampling box (*see* Figure G.26-1). These locations will be determined by applying a sub-grid of potential sampling points and randomly choosing one. If the review or assessment determines the need to obtain additional samples collected within the area of the sampling box (*e.g.*, at asphalt cracks), these sample collection locations will be in addition to the grid sample locations.

## **6.2 Sample Collection Procedures**

Samples will be collected in accordance with the Permit Section 9.4.7.1 and the procedures identified in this incorporating guidance from the United States Environmental Protection Agency (USEPA) (EPA, 1986 and EPA, 2002), DOE (DOE, 1995), and other Department-approved procedures.

### **6.2.1 Soil and Sediment Sampling**

Soil samples will be collected and analyzed to determine if hazardous constituents are present in the soil beneath the permitted unit. Soil samples will be collected using a spade, scoop, auger, or trowel or other equipment as specified in approved methods for the type of analytes and from appropriate depths as directed in Permit Section 9.4.7.ii (*i.e.*, EPA 1996 or 2002). Samples will be kept at their at-depth temperature or lower, protected from ultraviolet light, sealed tightly in the recommended container, and analyzed within the specific holding times listed in Table G.26-5.

### **6.2.2 Wipe Sampling**

Surface wipe samples will be collected and analyzed to determine if residual hazardous constituents remain on the structures, surfaces, or related equipment at the permitted unit. Samples will be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) *Manual of Analytical Methods* (NIOSH, 1994). The appropriate wipe sample method will consider the type of surface being

sampled, the type of constituent being sampled for, the solution used, and the desired constituent concentration detection limit.

The NIOSH method includes wiping a 100 square centimeter area at each discrete location with a gauze wipe wetted with a liquid solution appropriate for the desired analysis (*e.g.*, deionized water for lead). For wipe sampling, guidance from the analytical laboratory must be obtained prior to wipe verification sampling to confirm that the solution chosen for each analysis is appropriate for the analysis to be conducted and that wipe sampling is a proper technique for the analysis.

### **6.2.3 Cleaning of Sampling Equipment**

Reusable sampling equipment will be cleaned and rinsed prior to use. Sampling equipment rinsate blanks will be collected and analyzed only if reusable sampling equipment is used. Reusable decontamination equipment, including protective clothing and tools, used during closure activities will be scraped as necessary to remove residue and cleaned with a wash water solution. Sampling equipment will be cleaned prior to each use with a wash solution, rinsed several times with tap water, and air-dried to prevent cross-contamination of samples. A disposable sampler is considered clean if still in a factory-sealed wrapper.

## **6.3 Sample Management Procedures**

The following sections provide a description of sample documentation, handling, preservation, storage, and sample packaging, and transportation requirements that will be followed during the sampling activities associated with the closure.

### **6.3.1 Sample Documentation**

Sampling personnel will complete and maintain records to document sampling and analysis activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody forms will be maintained by sampling personnel until the samples are relinquished to the analytical laboratory. This will ensure the integrity of the samples and provide for an accurate and defensible written record of the sampling possession and handling from the time of collection until laboratory analysis. One chain-of-custody form may be used to document all of the samples collected from a single sampling event. The sample collector will be responsible for the integrity of the samples collected until properly transferred to another person. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector will document all pertinent sample collection data. Individuals relinquishing or receiving custody of the samples will sign, date, and note the time on the analysis request and chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory

analysis. The analytical laboratory will return the completed chain-of-custody form to the Facility and it will become part of the permanent sampling record documenting the sampling efforts.

#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label will be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal will be placed on each sample container to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross outs must be made with a single line with the change initialed and dated by the author. The sample logbook will include the following information:

- a. the sample location;
- b. suspected composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. name(s) of personnel responsible for the observations.

### **6.3.2 Sample Handling, Preservation, and Storage**

Samples will be collected and containerized in appropriate pre-cleaned sample containers. Table G.26-5 presents the requirements in *SW-846* (EPA, 1986) for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius will be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities will meet safety expectations, QA requirements, DOE Orders, and relevant local, state, and federal laws (including 10 CFR and 49 CFR). Appropriate Facility documents establish the requirements for packaging design, testing, acquisition, acceptance, use, maintenance, and decommissioning and for on-site, intra-site, and off-site shipment preparation and transportation of general commodities, hazardous materials, substances, waste, and defense program materials.

Off-site transportation of samples will occur via private, contract, or common motor carrier, air carrier, or freight. All off-site transportation will be processed through the Facility packaging and transportation organization, unless the shipper is specifically authorized through formal documentation by that organization to independently tender shipments to common motor or air carriers.

## **6.4 Sample Analysis Requirements**

Samples will be analyzed for all hazardous constituents listed in Appendix VIII of 40 CFR Part 261 and in Appendix IX of 40 CFR Part 264 that have been stored at the permitted unit over its operational history. Samples will be analyzed by an independent laboratory using the methods outlined in Table G.26-3. Analytes, test methods and instrumentation, target detection limits, and rationale for metals and organic analyses are presented in Table G.26-. If any of the information from these tables has changed at the time of closure, the Permittees will amend this closure plan to update all methods in this SAP.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory will perform the detailed qualitative and quantitative chemical analyses specified in Section 6.4.2 of this closure plan. The analytical laboratory will have:

- a. a documented comprehensive QA/QC program;
- b. technical analytical expertise;
- c. a document control/records management plan; and
- d. the capability to perform data reduction, validation, and reporting.

The selection of the analytical testing methods identified in Table G.26-4 is based on the following considerations:

- e. the physical form of the waste;
- f. constituents of concern;

- g. required detection limits (*e.g.*, regulatory thresholds); and
- h. information requirements (*e.g.*, waste classification).

#### **6.4.2 Quality Assurance/Quality Control**

All sampling and analysis will be conducted in accordance with QA/QC procedures defined by the latest revision of “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods” (SW-846) (EPA, 1986) or other Department-approved procedures. Field sampling procedures and laboratory analyses will be evaluated through the use of QA/QC samples to assess the overall quality of the data produced. QC samples evaluate precision, accuracy, and potential sample contaminations associated with the sampling and analysis process and are described in the following sections, along with information on calculations necessary to evaluate the QC results.

##### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected are trip blanks, field blanks, field duplicates, and equipment rinsate blanks. Table G.26-6 presents a summary of QC sample types, applicable analyses, frequency, and acceptance criteria. QC samples will be given a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be applied to the associated sample.

##### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units, transfer of data between recording media, and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports will include:

- a. a summary of analytical results for each sample;
- b. results from QC samples such as blanks, spikes, and calibrations;
- c. reference to standard methods or a detailed description of analytical procedures; and
- d. raw data printouts for comparison with summaries.

The laboratory will describe the analysis in sufficient detail so that the data user can understand how the sample was analyzed.

## 7.0 WASTE MANAGEMENT

All waste generated during closure will be controlled, handled, characterized, and disposed of in accordance Permit Section 9.4.5, Permit Attachment C (*Waste Analysis Plan*), and Facility waste management procedures. Closure activities may generate different types of waste materials; these wastes are listed with potential disposal options in Table G.26-3 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal. Reusable protective clothing, tools, and equipment used during decontamination will be cleaned with a wash water solution. Disposable equipment and other small equipment that cannot be decontaminated, as summarized in Table G.10-6, will be containerized and managed as waste.

## 8.0 CLOSURE CERTIFICATION REPORT

Upon completion of the closure activities at the permitted unit, a closure certification report will be prepared and submitted to the Department for review and approval in accordance with Permit Section 9.5.

## 9.0 REFERENCES

- DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.
- EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.
- EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, DC.
- LANL, 1999. "Screening Level Ecological Risk Assessment Methods," LA-UR-99-1406, Los Alamos National Laboratory, Los Alamos, New Mexico.
- NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.
- NMED, 2006. "Technical Background Document for Development of Soil Screening Levels," Rev. 4.0, June 2006, New Mexico Environment Department, Santa Fe, New Mexico.



### Table G.26-1

## Hazardous Waste Constituents of Concern at the Technical Area 55 Outdoor Container Storage Unit<sup>a</sup>

[illegible]

	U080, U103, U108, U117, U121, U123, U134, U154, U159, U165, U196, U210, U211, U213, U216, U220, U225, U226, U227, U228, U239	Trichloroethylene; Xylene
Cyanides	F007, F009  P030, P098, P099, P106	Cyanide plating bath solutions, Cyanide stripping cleaning solutions  Soluble cyanide salts (unspecified), Potassium cyanide, Potassium silver cyanide, Sodium cyanide

<sup>a</sup> Based on the permitted unit Operating Record

**Table G.26-2**  
**Closure Schedule for the Technical Area 55, Outdoor Container Storage Unit**

Activity	Maximum Time Required
Notify the Department of intent to close.	-45 Days
Final receipt of waste.	Day 0
Complete waste removal.	Day 90
Complete records review and structural assessment.	10 days after completed waste removal or 100 days after final receipt of waste
Complete all closure activities and submit final closure certification report to the Department.	Day 180

**Table G.26-3**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or the Waste Isolation Pilot Plant (WIPP), as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal

**Table G.26-3**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
		facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, or WIPP, as appropriate.
Discarded waste management equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Sampling equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.
Asphalt	Non-regulated solid waste	Subtitle D landfill or potentially, as included in corrective action activities at Area G.

**Table G.26-3**  
**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA or its state analog, or an authorized off-site radioactive waste disposal facility.
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill or WIPP, as appropriate.

**Table G.26-4**  
**Summary of Analytical Methods**

Analyte	EPA SW-846 Analytical Method <sup>a</sup>	Test Methods/ Instrumentation	Target Detection Limit <sup>b</sup>	Rationale
Metal Analysis				
Arsenic	6010, 7010, 7061A	ICP-AES, GFAA, CVAA	10 ug/L	Determine the metals concentration in the samples.
Barium	6010, 7010	ICP-AES,GFAA	200 ug/L	
Cadmium	6010, 7010	ICP-AES, GFAA	2 ug/L	
Chromium	6010, 7010	ICP-AES, GFAA	10 ug/L	
Lead	6010, 7010	ICP-AES, GFAA	5 ug/L	
Mercury	6010, 7470A, 7471B	ICP-AES, CVAA	0.2 ug/L	
Selenium	6010, 7010, 7741A	ICP-AES, GFAA, CVAA	5 ug/L	
Silver	6010, 7010	ICP-AES, GFAA	10 ug/L	
Organic Analysis				
Target compound list VOCs plus ten tentatively identified compounds (TIC)	8260B	GC/MS	10 mg/L	Determine the VOCs concentration in the samples.
Target compound list SVOCs plus 20 TICs	8270D, 8275	GC/MS	10 mg/L	Determine the SVOCs concentration in the samples.

<sup>a</sup> U.S. Environmental Protection Agency (EPA), 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846.

<sup>b</sup> Detection limits listed for metals are for clean water. Detection limits for organics are expressed as practical quantitation limits. Actual detection limits may be higher depending on sample composition and matrix type.

CVAA = Cold-vapor atomic absorption spectroscopy

FLAA = Flame atomic absorption spectroscopy

GC/MS = Gas chromatography/mass spectrometry

GFAA = Graphite furnace atomic absorption spectroscopy

ICP-AES = Inductively coupled plasma-atomic emission spectrometry

mg/L = milligrams per liter

ug/L = micrograms per liter.

**Table G.26-5**  
**Sample Containers<sup>a</sup>, Preservation Techniques, and Holding Times<sup>b</sup>**

Analyte Class and Sample Type	Container Type and Materials	Preservation	Holding Time
Metals			
TCLP/Total Metals: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	Aqueous Media:  500-mL Wide Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	180 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
TCLP/Total Mercury	Aqueous Media:  500-mL Wide Mouth-Polyethylene or Glass with Teflon Liner	Aqueous Media:  HNO <sub>3</sub> to pH <2  Cool to 4 °C	28 Days
	Solid Media:  125-mL Glass	Solid Media:  Cool to 4 °C	
Volatile Organic Compounds			
Target Compound Volatile Organic Compounds	Aqueous Media:  Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Aqueous Media:  HCl to pH<2  Cool to 4 °C	14 days
	Solid Media:  125-mL Glass or Two 40-mL Amber Glass Vials with Teflon-Lined Septa	Solid Media  Cool to 4 °C  Add 5 mL Methanol or Other Water Miscible Organic Solvent to 40-mL Glass Vials	



<i>Semi-Volatile Organic Compounds</i>			
Target Compound Semi-volatile Organic Compounds	Aqueous Media:  Four 1-L Amber Glass with Teflon-Lined Lid	Aqueous Media:  Cool to 4 °C	Seven days from field collection to preparative extraction. 40 days from preparative extraction to determinative analysis.
	Solid Media:  250-mL Glass	Solid Media:  Cool to 4 °C	

<sup>a</sup> Smaller sample containers may be required due to health and safety concerns associated with potential radiation exposure, transportation requirements, and waste management considerations.

<sup>b</sup> Information obtained from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, 1986 and all approved updates.

°C = degrees Celsius

HCl = hydrochloric acid

mL = milliter

HNO<sub>3</sub> = nitric acid

L = Liter

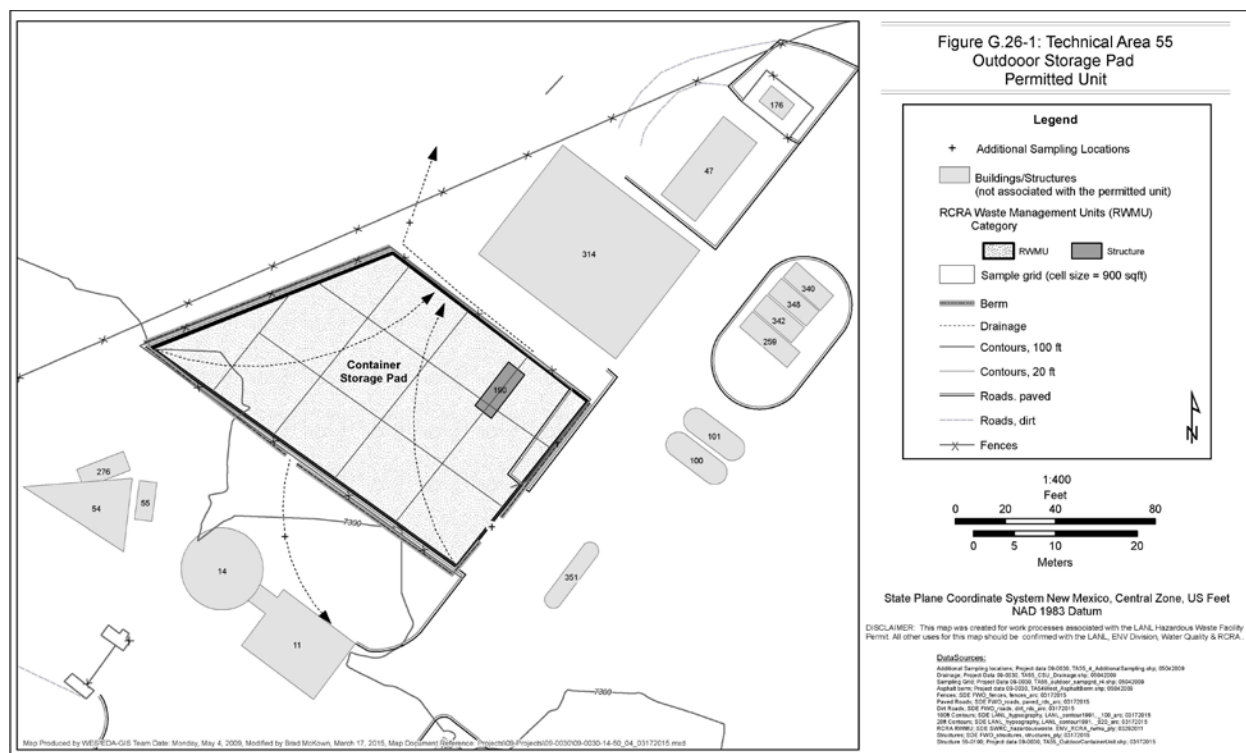
TCLP = Toxicity Characteristic Leaching Procedure

**Table G.26-6**  
**Recommended Quality Control Sample Types, Applicable Analyses, Frequency, and Acceptance Criteria**

QC Sample Type	Applicable Analysis <sup>a</sup>	Frequency	Acceptance Criteria
Trip Blank	VOC	One set per shipping cooler containing samples to be analyzed for VOCs	Not Applicable
Field Blank	VOC/SVOC, metals	One sample daily per analysis	Not Applicable
Field Duplicate	Chemical	One for each sampling sequence	Relative percent difference less than or equal to 20 percent
Equipment Rinsate Blank <sup>b</sup>	VOC/SVOC, metals	One sample daily	Not Applicable

<sup>a</sup> For VOC and SVOC analysis, if blank shows detectable levels of any common laboratory contaminant (*e.g.*, methylene chloride, acetone, 2-butanone, toluene, and/or any phthalate ester), sample must exhibit that contaminant at a level 10 times the quantitation limit to be considered detectable. For all other contaminants, sample must exhibit the contaminant at a level 5 times the quantitation level to be considered detectable.

<sup>b</sup> Collected only if reusable sampling equipment used.



**Figure G.26-1: Technical Area 55 Outdoor Container Storage Unit Grid Sampling and Additional Sampling Locations**

**ATTACHMENT G.27**  
**TECHNICAL AREA 63**  
**TRANSURANIC WASTE FACILITY**  
**CLOSURE PLAN**

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G.27-1	Transuranic Waste Facility Soil Sampling Grid



## 1.0 INTRODUCTION

This closure plan describes the activities necessary to close the permitted mixed waste Transuranic Waste Facility (TWF) at Technical Area (TA)-63 at the Los Alamos National Laboratory (Facility) hereinafter referred to as the “Unit To Be Closed,” or the “Permitted Unit.” The information provided in this closure plan addresses the closure requirements specified in Permit Part 9 and the Code of Federal Regulations (CFR), Title 40, Part 264, Subparts G and I for waste management units operated at the Facility under the Resource Conservation and Recovery Act (RCRA) and the New Mexico Hazardous Waste Act.

The TWF unit will be closed by removal of all structures and equipment. Until closure is complete and has been certified in accordance with Permit Part 9.5 and 40 CFR §264.115, a copy of the approved closure plan or the hazardous waste facility permit containing the plan, any approved revisions to the plan, and closure activity documentation associated with the closure will be on file with hazardous waste compliance personnel at the Facility and at the U.S. Department of Energy (DOE) Los Alamos Site Office. Prior to closure of the unit, this closure plan may be amended in accordance with Permit Section 9.4.8 to provide updated sampling and analysis plans and to incorporate updated decontamination technologies. Amended closure plans shall be submitted to the New Mexico Environment Department (the Department) for approval prior to implementing closure activities.

## 2.0 DESCRIPTION OF UNIT TO BE CLOSED

The TWF is located at TA-63 at the junction of Pajarito Road and Puye Road, within the triangle formed by Building 63-111 to the east, Puye Road to the north, and Pajarito Road to the southwest. It was designed, constructed, and commissioned as a Hazard Category (HC)-2 nuclear facility and permitted as Resource Conservation and Recovery Act (RCRA) Storage Facility for TRU, mixed TRU and hazardous wastes. This site is shown on Permit Figure 55. Permit Attachment A.6, Technical Area (TA), Unit Descriptions contains additional site information and building numbers.

### STRUCTURES THAT HAVE MANAGED HAZARDOUS WASTE TO BE REMOVED AT CLOSURE:

- Storage Buildings: 63-0149, 63-0150, 63-0151, 63-0152, and 63-0153
- Storage and Characterization Building: 63-0154
- Characterization Trailers: 63-0155, 63-0156, and 63-0156
- Concrete Storage Pad

Six buildings are designated for storage of TRU and Mixed TRU wastes in support of LANL programs and missions. One of the storage structures is used for both storage of larger-sized waste containers and for head space gas sampling and analysis. Certification of containers in accordance with Waste Isolation Pilot Plant (WIPP) Waste Acceptance Criteria (WAC) occurs at three characterization and testing trailers. A concrete pad underlies the storage and characterization buildings and trailers. The boundaries of the pad will be used to designate the RCRA-permitted portion of the TWF.

### OTHER TWF STRUCTURES TO BE REMOVED AT CLOSURE:

- Retention Basin
- Calibration Source and Matrix Module (CSMM) Building: 63-0158

The CSMM Building and the Retention Basin are the only structures that will be closed within the boundary of the TWF permitted hazardous waste management unit that are not used to manage hazardous waste.

### **3.0 ESTIMATE OF MAXIMUM WASTE STORED**

The TWF shall not store a volume greater than 105,875 gallons of waste at any time for the lifetime of the permitted facility.

## **4.0 GENERAL CLOSURE REQUIREMENTS**

### **4.1 Closure Performance Standards**

As required by Permit Section 9.2, the permitted unit will be closed to meet the following performance standards:

- a. remove all hazardous waste residues and hazardous constituents; and
- b. ensure contaminated media do not contain concentrations of hazardous constituents greater than the clean-up levels established in accordance with Permit Sections 11.4 and 11.5. The cleanup levels for soil shall be established based on residential land use. The Permittees must also demonstrate that there is no potential for contaminants to affect surface water or groundwater.

Closure of the permitted unit will be deemed complete when: 1) All surfaces and equipment have been decontaminated, or otherwise properly disposed of; 2) closure has been certified by an independent, professional engineer licensed in the State of New Mexico; and 3) closure certification has been submitted to, and approved by, the Department.

### **4.2 Closure Schedule**

This closure plan is intended to address closure requirements for the permitted unit within the authorized timeframe of this Permit (see Permit Section 9.4.1). However, pursuant to 40 CFR §264.112(e), removing hazardous wastes and decontaminating or dismantling equipment in accordance with an approved closure plan may be conducted at any time before or after notification of closure. Subject to the provisions of 40 CFR §264.113(a), such removal may only occur before the end of the allowed 90 day period to remove, treat or dispose of all hazardous waste after receipt of the final volume of waste. For the purposes of this closure plan, portable and temporary structures in this permitted unit such as characterization trailers are considered to be equipment by their design rather than structures.

Closure activities will proceed according to the schedule discussed below and Table 1 of this closure plan. Notification of closure will occur at least 45 days prior to the start of closure activities (see 40 CFR § 264.112(d)(1)). Closure activities will begin according to the requirements of 40 CFR § 264.112(d)(2) no later than 30 days after the date on which the unit receives the known final volume of waste. All hazardous wastes will be removed from the TWF within 90 days of the receipt of the known final volume of waste pursuant to Permit Section 9.4.1, Closure Schedule, Permit Section 9.4.2, Removal of Hazardous Waste, and 40 CFR §264.113(a). A records review of the operating history of the unit shall be completed within ten days of the removal or treatment of all waste from the permitted unit as required by Permit Section 9.4.6.1, Records Review. A structural assessment of the unit will occur within ten days of the completed removal or treatment of all waste from the permitted unit as required by Permit Section 9.4.6.2,

Structural Assessment. Notification of the structural assessment (assessment), as described in Section 5.2 of this closure plan, will occur in accordance with Permit Section 9.4.6.2.

After completion of the records review and structural assessment, the Permittees shall submit an amended closure plan, if necessary, to the NMED for review and approval as a permit modification request to incorporate changes to the sampling and analysis plan. Decontamination verification sampling activities, and soil sampling, shall be conducted in accordance with this closure plan to demonstrate the closure performance standards included in Permit Section 9.2.1 have been met.

All closure activities shall be completed within 150 days of the beginning of closure activities or 180 days after the receipt of the known final volume of waste in compliance with Permit Section 9.4.1.1. The final closure report and certification will be submitted to NMED for review and approval within 60 days of completion of closure in accordance with Permit Section 9.5. In the event that the activities required under the closure plan cannot be completed within the allotted timeframe, the Permittees may request a permit modification to modify the schedule pursuant to the requirements of Permit Section 9.4.8, Amendment of the Closure Plan. In the event that closure of the TWF cannot proceed according to schedule, the Permittees shall request a time extension to complete the closure in accordance with Permit Section 9.4.1.1.

## **5.0 CLOSURE PROCEDURES**

The following sections describe the procedures to be used for closure of the permitted unit. The procedures shall occur in the sequence described in this section (5), although the operating record review described in Section 5.2.1 may be started earlier.

### **5.1 Removal of Waste**

In accordance with Permit Part 9.4.2, all stored hazardous waste shall be removed from the TWF for transport to WIPP in accordance with all DOE, US DOT, and WIPP shipping and transporting requirements. All hazardous-only or MLLW waste containers will be moved to a permitted on-site storage unit or a permitted off-site treatment, storage, or disposal facility.

### **5.2 Records Review and Structural Assessment**

Before starting decontamination and sampling activities, the operating and inspection records for the TWF shall be reviewed and a structural assessment of the entire TWF shall be conducted to identify additional sampling locations.

#### **5.2.1 Records Review**

The Facility Operating and Inspection Records shall be reviewed in accordance with Permit Section 9.4.6.1. The goals of this review will be to:

- a. ascertain the specific hazardous waste constituents of concern; and
- b. determine additional sampling locations (e.g., locations of any spills or chronic conditions identified in the Operating Record).

#### **5.2.2 Structural Assessment**

A structural assessment (assessment) of the unit's physical condition shall be conducted in accordance with Permit Section 9.4.6.2 and all observations shall be documented including any necessary

photographs and drawings. The TWF structural assessment shall include the concrete pad (as an outdoor pad defined in Section 9.1.3(1) of the Permit) and the retention basin. If the assessment reveals any evidence of a release (e.g., stains) or damage (e.g., cracks, gaps, chips) to the flooring or building materials, the Permittees must incorporate these locations as additional sampling points in the updated sampling and analysis plan (see Section 7.0) and describe the applicable sampling methods and procedures in the plan. If evidence of a release or damage is present, a wipe sample or a representative sample of the media (e.g., concrete chip) will be collected according to the procedures in Section 7.2. If additional sampling locations are necessary, the Permittees shall request a permit modification to modify the sampling and analysis plan in accordance with Permit Section 9.4.6. The locations of any additional sampling locations shall be determined in accordance with Permit Section 11.10.2.5.

### **5.3 Decontamination and Removal of Structures and Related Equipment**

In accordance with the procedures in Permit Section 9.4.3, all remaining hazardous waste residues and hazardous constituents shall be removed from the TWF. The unit's structures and related equipment shall be decontaminated and removed. All waste shall be managed and characterized as necessary for disposal as required by Permit Attachment C, Waste Analysis Plan, Permit Section 9.4.5, and the LANL waste management procedures.

#### **5.3.1 Removal of Structures and Related Equipment**

All structures and related equipment that are removed from the unit will require no further decontamination but shall be considered solid waste and potentially, hazardous waste, as defined by this Permit, at removal. The materials shall be disposed in accordance with Permit Section 9.4.5 and Section 5.3 of this closure plan. The concrete pad, the materials associated with the pad (curbing and ramps), and a minimum of six inches of the base course and soil underlying the concrete pad shall be removed. If the remaining soil surface shows evidence that the removal to this point has not included all contaminated soils and construction materials associated with the pad, additional soil shall be removed until the conditions of Permit Section 9.2 are met. The option of removing small areas of concrete at sampling locations where contamination is suspected (i.e., spill or staining sites) to allow sampling without disturbing the surrounding area prior to the general removal of the pad may be evaluated at the time of the structural assessment. If this option is used, the concrete removed at the sampling location and any concrete subsequently removed from the location during the general removal of the concrete pad to a radius to be determined during the structural assessment shall be segregated to prevent potential cross contamination during the closure process.

#### **5.3.2 Decontamination of Structures and Related Equipment**

All structures and related equipment that will be re-used by the Facility will be decontaminated in accordance with Permit Section 9.4.3.1. This may include the characterization trailers and any associated equipment removed at closure. The lists of equipment needing decontamination shall be reviewed during the pre-closure and structural assessment described in Part 9 of the Permit.

Water resistant equipment at the permitted unit will be decontaminated by steam cleaning using water or pressure washing with a solution consisting of a surfactant detergent (e.g., Alconox®) and water. Wipe-down washing with a solution consisting of a surfactant detergent (e.g., Alconox®) and water may be conducted on equipment within the unit if containment cannot be established for collection of the steam cleaning water or pressure wash solution or these methods will damage the equipment preventing further use or recycling. The quantity of the wash solution shall be minimized by dispensing from buckets, spray bottles, or other types of containers. Cheesecloth, rags, or other absorbent materials shall be used to wipe

down the equipment after being wetted in the wash solution or after spraying solution onto the equipment. If necessary, portable berms or other devices (e.g., absorbent socks, plastic sheeting, wading pools, or existing secondary containment) designed to collect and provide containment shall collect excess wash water and provide containment during the decontamination process. Wash solutions shall not be allowed to enter the fire suppression water drains.

#### **5.4 Equipment Used During Decontamination Activities**

Reusable protective clothing, tools, and equipment used during closure activities shall be cleaned with an Alconox® or other NMED approved wash water solution. The solution shall be characterized and managed as a hazardous waste unless characterization demonstrates that the solution is nonhazardous. Residue, disposable equipment, and equipment that cannot be decontaminated shall be containerized and managed as waste.

### **6.0 SAMPLING AND ANALYSIS PLAN**

This sampling and analysis plan (SAP) describes the sampling and analytical methods as well as the quality assurance and quality control (QA/QC) procedures that shall be used to demonstrate that the permitted unit is closed in accordance with Permit Part 9 and all applicable closure requirements.

#### **6.1 Soil Sampling Locations**

Soils sampling shall be conducted at the permitted unit in order to verify that the removal of structures and soils, with other closure related activities meet the closure performance standards in Permit Section 9.2, Closure Performance Standards. All samples shall be collected and analyzed in accordance with the procedures in Sections 6.2, 6.3, and 6.4 of this closure plan. Soil samples shall be collected from beneath the concrete pad of the unit and in additional sampling locations specified to meet the conditions of Permit Section 9.4.7.1.ii.

In compliance with Permit Section 9.4.7.ii, this closure plan will ensure the collection of surface soil samples in the following locations:

- a. a minimum of one sample at each loading/unloading point for a total of six samples (see Permit Section 9.4.7.1.ii(1));
- b. a minimum of one sample every 900 square feet of the permitted unit for a total of 88 samples (see Permit Section 9.4.7.1.ii(2));
- c. a minimum of one sample at the stormwater discharge drainage location (see Permit Section 9.4.7.1.ii(3));
- d. a minimum of one sample, at 30 foot intervals, along the valley gutter for a total of 4 samples (see Permit Section 9.4.7.1.ii(8)); and
- e. a minimum of three additional samples along the long axis of the retention basin (see Permit Section 9.4.7.ii(5)).

The above referenced soil sample locations are illustrated in Figure F-1 of this closure plan.

#### **6.2 Sample Collection Procedures**

Samples shall be collected in accordance with Permit Sections 9.4.7.1 and 11.10 and the procedures described in this SAP. Additional surface and subsurface samples shall be collected if contamination is

detected or if the records review or structural assessment identify the need for additional sample collection.

#### **6.2.1 Liquid Sampling**

Grab samples of any liquids present in the retention basin shall be collected to demonstrate that the drain system has not been contaminated. Liquid sampling shall be conducted using glass or plastic tubes, a composite liquid waste sampler, a bacon bomb sampler, or bailer. The samples shall be transferred directly from the sampler to the pre-cleaned laboratory prepared sample containers appropriate for each analytical method.

#### **6.2.2 Wipe Sampling**

If surface wipe samples are collected from structures or surfaces, the samples shall be collected in accordance with the National Institute of Occupational Safety and Health (NIOSH) Manual of Analytical Methods, Method 9100 (NIOSH, 1994), or other approved methodology. Wipe sample methods shall be appropriate for the type of surface being sampled, the type of contaminant, and the desired method detection limits, wiping a 100 square centimeter area at each discrete location in accordance with guidance and the requirements of the analytical laboratory.

#### **6.2.3 Soil Sampling**

Soil shall be sampled using a spade, trowel, or other equipment as specified in approved methods for the type of analyte (i.e., EPA 1996 or 2002). At minimum soil samples shall be collected at the frequency specified in the Permit, Section 9.4.7.1.ii. The soil samples shall be collected in accordance with Permit section 11.10.2.9.

#### **6.2.4 Cleaning of Sampling Equipment**

Reusable sampling equipment shall be decontaminated and rinsed prior to use. Sampling equipment rinsate blanks shall be collected and analyzed if reusable sampling equipment is used. Reusable equipment, tools and, sampling equipment shall be cleaned prior to each use in accordance with Permit Section 11.10.2.11. A disposable sampler is considered clean if still in a factory-sealed wrapper. Residue and decontamination equipment that cannot be decontaminated will be containerized as solid or hazardous waste as appropriate.

### **6.3 Sample Management Procedures**

Samples shall be collected and transported using documented chain-of-custody and sample management procedures to ensure the integrity of the sample and provide an accurate and defensible written record of the possession and handling of a sample from the time of collection through laboratory analysis in accordance with Permit Section 11.10.2.9.

#### **6.3.1 Sample Documentation**

Sampling personnel shall document all sampling, logging and field screening activities. Sample documentation will include sample identification numbers, chain-of-custody forms, analysis requested, sample descriptions (e.g., soil classification) sample logbooks detailing sample collection activities, and shipping forms (if necessary).

#### **6.3.1.1 Chain-of-Custody**

Chain-of-custody procedures shall be followed until the samples are relinquished to the analytical laboratory in accordance with Permit Section 11.10.2.14.ii. The sample collector is responsible for the integrity of the samples collected until transferred. The EPA considers a sample to be in a person's custody if it is:

- a. in a person's physical possession;
- b. in view of the person in possession; or
- c. secured by that person in a restricted access area to prevent tampering.

The sample collector shall document all sample collection data. Individuals relinquishing or receiving custody of the samples shall sign, date, and note the time on the analysis request/chain-of-custody form. A chain-of-custody form must accompany all samples from collection through laboratory analysis. Copies of completed original chain-of-custody form shall be returned to the Permittees by the analytical laboratory and included with the associated laboratory report attached to the Closure Report.

#### **6.3.1.2 Sample Labels and Custody Seals**

A sample label shall be affixed to each sample container. The sample label will include the following information:

- a. a unique sample identification number;
- b. name of the sample collector;
- c. date and time of collection;
- d. type of preservatives used, if any; and
- e. location from which the sample was collected.

A custody seal shall be placed on each sample container or shipping container containing multiple samples to detect unauthorized tampering with the samples. These labels must be initialed, dated, and affixed by the sample collector in such a manner that it is necessary to break the seal to open the container.

#### **6.3.1.3 Sample Logbook**

All pertinent information on the sampling effort must be recorded in a bound logbook. Information must be recorded in ink and any cross outs must be made with a single line and the change initialed and dated by the author. The sample logbook shall include the following information:

- a. the sample location by GPS, or other NMED approved coordinates;
- b. composition;
- c. sample identification number;
- d. volume/mass of sample taken;
- e. purpose of sampling;
- f. description of sample point and sampling methodology;
- g. date and time of collection;
- h. name of the sample collector;
- i. sample destination and how it will be transported;
- j. observations; and
- k. names of personnel responsible for the observations.

### **6.3.2 Sample Handling, Preservation, and Storage**

Samples shall be collected and containerized in appropriate pre-cleaned sample containers in accordance with the requirements specified in SW-846 (EPA, 1986 as updated) and Permit Section 11.10.2.9 for sample containers, preservation techniques, and holding times. Samples that require cooling to 4 degrees Celsius shall be placed in a cooler with ice or ice gel or in a refrigerator immediately upon collection.

### **6.3.3 Packaging and Transportation of Samples**

All packaging and transportation activities shall meet U.S. DOT requirements for transport of solid, hazardous, and radioactive waste, as applicable, DOE Orders, and all other relevant local, state, and federal laws (including 10 CFR and 49 CFR).

Off-site transportation of samples shall occur via private, contract, or common motor carrier; air carrier; or freight.

## **6.4 Sample Analysis Requirements**

Samples shall be analyzed for all hazardous constituents listed in Appendix VIII 40 CFR 261 and in Appendix IX of 40 CFR 264 that have been stored at the permitted unit during its operational history. Samples shall be analyzed by an independent laboratory using the analytical methods appropriate for the constituents identified in the operating record.

### **6.4.1 Analytical Laboratory Requirements**

The analytical laboratory shall perform the detailed qualitative and quantitative chemical analyses in accordance with Section 6.4.2 and Permit Section 11.10.3. The analytical methods and quality control procedures shall be conducted in accordance with Permit Section 11.10.3 and specifically Section 11.10.3.1. This Closure Plan shall be updated to list the specific analytical methods used for sample analysis no less than 10 days prior to closure of the hazardous waste management unit.

### **6.4.2 Quality Assurance/Quality Control**

Field sampling procedures and laboratory analyses shall be evaluated through the use of QA/QC samples to assess the overall quality of the data produced in accordance with Permit Sections 11.10.2.4.vii, 11.10.2.8.iv, and 11.10.3.1. QC samples evaluate precision, accuracy, and potential sample contaminations associated with the sampling/analysis process and are described in the following sections, along with information on calculations necessary to evaluate the QC results. Analysis will be conducted in accordance with the procedures described in SW-846 (EPA, 1986 as updated) and Permit Section 11.10.3.

#### **6.4.2.1 Field Quality Control**

The field QC samples that will be collected include trip blanks, field blanks, field duplicates, and equipment rinsate blanks as required by Permit Sections 9.4.7.1(8), 11.10.2.4.vii, and 11.10.2.9(4). QC samples will be labeled with a unique sample identification number and submitted to the analytical laboratory as blind samples. QC samples will be identified on the applicable forms so that the results can be compared to the associated sample.



#### **6.4.2.2 Analytical Laboratory QC Samples**

QA/QC considerations are an integral part of analytical laboratory operations. Laboratory QA ensures that analytical methods generate data that are technically sound, statistically valid, and that can be documented. QC procedures are the tools employed to measure the degree to which these QA objectives are met.

#### **6.4.3 Data Reduction, Verification, Validation, and Reporting**

Analytical data generated by the activities described in this closure plan will be verified and validated. Data reduction is the conversion of raw data to reportable units; transfer of data between recording media; and computation of summary statistics, standard errors, confidence intervals, and statistical tests.

#### **6.4.4 Data Reporting Requirements**

Analytical results will include all pertinent information about the condition and appearance of the sample-as-received. Analytical reports shall include the data specified in Permit Section 11.10.3.1.iv. The level II laboratory analytical data package shall be included with the closure report for the HWMU.

The laboratory shall include a case narrative in each laboratory report for the hazardous waste management unit that identifies data quality exception corrective action taken and the effect of the data quality exceptions on the acceptability of the data.

### **7.0 WASTE MANAGEMENT**

All waste generated during closure shall be controlled, handled, characterized, and disposed of in accordance with Permit Section 9.4.5, Permit Attachment C (Waste Analysis Plan), and Facility waste management procedures. Closure activities may generate different types of waste materials, which are listed with potential disposal options in Table G.27-2 of this closure plan. Subsequent disposition options for the decontaminated structures and equipment include reuse, recycling, or disposal.

Portable berms or other devices, if necessary, shall be used to collect excess wash water and provide containment during the decontamination activities to prevent releases. All wash water shall be collected, transferred to containers, sampled, and analyzed for the hazardous constituents as referenced in section 6.4 of this plan. Based on the results of the analysis, the wash water shall be managed as hazardous or non-hazardous wastewater. Reusable protective clothing, tools, and equipment used during decontamination shall be cleaned in accordance with section 6.2.4 of this plan. Disposable equipment and other small equipment that cannot be decontaminated shall be containerized and managed as waste.

### **8.0 CLOSURE CERTIFICATION REPORT**

Upon completion of the closure activities at the TWF, a closure report shall be prepared and submitted to the Department. The report shall document that the unit has been closed in compliance with the specifications in this closure plan and will contain the following information in accordance with Section 9.5 of the Permit:

The closure report shall summarize all activities conducted during closure including, but not limited to, the following:

- 1) a summary of the site history including the waste managed at the unit and any records of spill or other incidents;

- 2) the results of all investigations conducted during closure following the report format set forth in Permit Section 11.12.3;
- 3) remediation waste management;
- 4) decontamination;
- 5) decontamination verification and soil sampling activities; and
- 6) results of all chemical analyses and other characterization activities;
- 7) a summary of all cleanup actions, including volumes of contaminated media removed and confirmation sampling results; and
- 8) a demonstration that the cleanup levels specified in Permit Section 11.4 and 11.5 have been achieved.

The closure report shall be submitted to the Department no later than 60 days after completion of closure of the TWF Permitted Unit. The certification must be signed by the Permittees and by an independent professional engineer registered in the State of New Mexico.

The report will document the permitted unit's closure and contain, at a minimum, the following information:

- 9) a copy of the certification pursuant to 40 CFR § 264.115;
- 10) any variance, and the reason for the variance, from the activities approved in this closure plan;
- 11) documentation of the structural assessment and records review conducted under this Permit Part 9;
- 12) a summary of all sampling results related to equipment decontamination, demolition and disposal that includes:
  - a. sample identification;
  - b. sampling location;
  - c. data reported;
  - d. detection limit for each analyte;
  - e. a measure of analytical precision (e.g., uncertainty, range, variance);
  - f. identification of analytical procedure; and
  - g. identification of analytical laboratory;
- 13) a QA/QC statement on analytical data validation and decontamination verification;
- 14) storage or disposal locations for hazardous waste resulting from closure activities; and
- 15) a certification statement of the accuracy of the Closure Report.

## **9.0 DEPARTMENT CLOSURE ASSESSMENT**

Upon submittal of the closure certification report described in Section 8.0 of this closure plan, the Facility shall arrange an on-site closure review with representatives of the Department to assess the completion of the closure activities of the permitted unit's closure activities.

## **10.0 REFERENCES**

- DOE, 1995. "DOE Methods for Evaluating Environmental and Waste Management Samples," DOE/EM-0089T, Rev. 2. Prepared for the U.S. Department of Energy by Pacific Northwest Laboratory, Richland, Washington.
- EPA, 1986 and all approved updates. "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA-SW-846, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.

EPA, 2002. "RCRA Waste Sampling Draft Technical Guidance Planning, Implementation, and Assessment," EPA530-D-02-002, August 2002, Office of Solid Waste, U.S. Environmental Protection Agency, Washington, DC.

NIOSH, 1994. The National Institute for Occupational Health and Safety (NIOSH) *Manual of Analytical Methods*, 4th ed. Issue 1. 1994.

**Table G.27-1**  
**Closure Schedule for the TA-63 TWF**

<b>Closure Activity</b>	<b>Schedule</b>	<b>Basis</b>
Provide closure notification to NMED	-45	40 CFR §264.112(d)(1)
Receive known final volume of waste	-30	Permit Section 9.4.1, 40 CFR §264.112(d)(2)(i)
Begin closure activity – requirement to begin removal of hazardous waste from the permitted unit	0	Permit Section 9.4.1, 40 CFR §264.112(d)(2)(i)
Notification of structural assessment to NMED	40	Permit Section 9.4.6.2: notification to occur at least 30 days prior to the structural assessment.
Hazardous waste removed	60	Permit Section 9.4.1 and 9.4.2, 40 CFR §264.113(a): removal must be completed within 90 days of the receipt of known final volume of hazardous waste.
Completion of record review	70	Permit Section 9.4.6.1: record review will occur within 10 days of completed waste removal or treatment.
Completion of structural assessment	70	Permit Section 9.4.6.2: structural assessment will occur within 10 days of completed waste removal or treatment.
Completion of closure activities	150	Permit Section 9.4.1.1, 40 CFR §264.113(b): closure activities must be completed within 180 days of the receipt of known final volume of hazardous waste.
Submittal of closure report to NMED	210	Permit Section 9.5, 40 CFR §264.115: report submitted within 60 days of closure completion

Note: The schedule shown represents the maximum allowable time to complete the activity.

**Table G.27-2**

**Potential Waste Materials, Waste Types, and Disposal Options**

Potential Waste Materials	Waste Types	Disposal Options
Personal protective equipment (PPE)	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	The PPE will be treated to meet Land Disposal Restriction (LDR) treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA, or an authorized off-site radioactive waste disposal facility. <sup>a</sup>
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D mixed waste landfill or the WIPP, as appropriate.
Decontamination wash water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	Radioactive Liquid Waste Treatment Facility (RLWTF)
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D mixed waste landfill or WIPP, as appropriate.
Verification water	Non-regulated liquid waste	Sanitary sewer
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Radioactive liquid waste	RLWTF
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D mixed waste landfill or WIPP, as appropriate.
Metal	Non-regulated solid waste	Subtitle D landfill or recycled

Potential Waste Materials	Waste Types	Disposal Options
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA, or an authorized off-site radioactive waste disposal facility. <sup>a</sup>
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D mixed waste landfill, or WIPP, as appropriate.
Discarded waste management equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA, or an authorized off-site radioactive waste disposal facility. <sup>a</sup>
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D mixed waste landfill or WIPP, as appropriate.
Sampling equipment	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA, or an authorized off-site radioactive waste disposal facility. <sup>a</sup>
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D mixed waste landfill or WIPP, as appropriate.
Storage Structures	Non-regulated solid waste	Subtitle D landfill
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.

Potential Waste Materials	Waste Types	Disposal Options
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA, or an authorized off-site radioactive waste disposal facility. <sup>a</sup>
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D mixed waste landfill or WIPP, as appropriate.
Concrete Pad	Non-regulated solid waste	Subtitle D landfill or potentially, re-use/recycle
	Hazardous waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D landfill, as appropriate.
	Low-level radioactive solid waste	Either an authorized on-site radioactive waste disposal area that is not undergoing closure under RCRA, or an authorized off-site radioactive waste disposal facility. <sup>a</sup>
	Mixed waste	Waste will be treated to meet LDR treatment standards, if necessary, and disposed in a Subtitle C or D mixed waste landfill or WIPP, as appropriate.

<sup>a</sup> This description of the disposal option for low level waste may be subject to revision pending the resolution of the LANL Appeal of the November 2010 LANL Hazardous Waste Facility Permit.

**Table G.27-3**  
**Hazardous Waste Constituents of Concern at the TWF<sup>a</sup>**

Category	EPA Hazardous Waste Numbers	Specific Constituents
Toxic Contaminants	D004	Arsenic
	D005	Barium hydroxide
	D006	Cadmium
	D007	Chromium
	D008	Lead
	D009	Mercury
	D010	Selenium
	D011	Silver
	D018	Benzene
	D019	Carbon tetrachloride
	D021	Chlorobenzene
	D022	Chloroform
	D026	Cresol
	D027	1,4-Dichlorobenzene
	D028	1,2-Dichloroethane
	D029	1,1-Dichloroethylene
	D030	2,4-Dinitrotoluene
	D032	Hexachlorobenzene
	D033	Hexachlorobutadiene
	D034	Hexachloroethane
	D035	Methyl ethyl ketone
	D036	Nitrobenzene
	D037	Pentachlorophenol
	D038	Pyridine
	D039	Tetrachloroethylene
	D040	Trichloroethylene
	D041	2,4,5-Trichlorophenol
	D042	2,4,6-Trichlorophenol
	D043	Vinyl chloride
Volatile Organic Compounds	F001	Spent halogenated solvents, trichloroethylene
	F002	Spent halogenated solvents
	F003	Spent non-halogenated solvents, xylene, acetone
	F004	Spent non-halogenated solvents
	F005	Spent non-halogenated solvents
Toxic listed waste	U080	Methylene chloride

<sup>a</sup> This will be modified as needed, based on the unit operating record.

EPA = U.S. Environmental Protection Agency



