



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION
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DENISE FORT, DIRECTOR

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Comments on the Closure Plan for the TA-3-102 Container Storage Area, LANL.

1. The plan is marked "ROUGH DRAFT," and so does not bind LANL to any closure activities. This is not acceptable.
2. There is no description of the storage area at TA-3-102, no indication of its size, no map, and no indication of what kind of wastes are stored there. There is no description of any ancillary equipment that may be used to handle the wastes there and which may need decontamination or disposal at closure. I have assumed that the TA-3-102 storage area is the lithium hydride storage area referred to in item 5 of EID's June 22, 1984 NOV, but this is nowhere clearly stated.
3. The plan refers to "disposal and/or treatment" of the wastes stored here; the meaning of this phrase is unclear. Does it refer to on-site or off-site disposal and/or treatment? What are the disposal and/or treatment options?
4. Because the nature of the wastes is never stated, the decontamination discussion is quite vague. Decontamination is to be done "appropriate (for) the wastes," but no examples of wastes are given; a table of wastes with decontamination procedures would be appropriate. There are no criteria for assessing contamination prior to decontamination other than visual criteria; this may not be appropriate, depending on the wastes handled. The plan says the floor area shall be "swept and/or washed;" sweeping is not adequate decontamination for an indoor hazardous waste storage area.
5. The maximum waste inventory appears to be exactly one and a half times the design capacity shown on the 1984 Part A application. Which is wrong, the Part A or the closure plan?
6. The plan says that decontamination residues will be "handled as a hazardous material" and "disposed of in accordance with the regulations." There are few regulations for the disposal of "hazardous material;" this sentence is too vague. What will be the disposition of these residues?
7. The certification of closure goes to the EID Director, not the EPA Regional Administrator.
8. There is no specified year of closure.
9. While the closure schedule is marginally adequate as given, the plan would be improved by a flowchart or a table outlining steps to closure, their time requirements, and contingencies that may affect these actions and times.



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TA-3-102 Comments Continued

10. There is no formal mention of scheduled inspection(s) by the certifying party during closure.

11. The EID may have further comments when more detailed submittals are made.