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DENISE FORT, DIRECTOR

September 7, 1984

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

Revisions made at the Sept. 11 and Sept 26 meetings are in **bold**.

(LANL's closure plan will be submitted Dec. 1, 1984)

1. The plan is marked "ROUGH DRAFT," and so does not bind LANL to any closure activities. This is not acceptable. **LANL agreed to remedy this by submitting an "interim" closure plan that would apply only until LANL's Part B is approved. This "interim" plan will commit LANL to actions at closure.**
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 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. **LANL will supply this information, within the limitations of security considerations.**
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. **The EID agreed that, if adjacent areas are actively being used for lithium hydride handling, vacuuming the storage area was an adequate decontamination procedure. Criteria for complete decontamination must be included in LANL's closure plan.**
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? **LANL will check and correct if necessary.**
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?



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Comments on TA-3-102 Closure, Continued

7. The certification of closure goes to the EID Director, not the EPA Regional Administrator. **LANL will correct this. The "independent" licensed engineer referred to in the HWMR-2 means a licensed consulting engineer who is not a salaried employee of LANL or DOE.**
8. There is no specified year of closure. **2100 is that year.**
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. **LANL may or may not improve the schedule.**
10. There is no formal mention of scheduled inspection(s) by the certifying party during closure. **Though there is no formal mention of inspections in the HWMR-2, such inspections are implicit in the certification requirements.**
11. The EID may have further comments when more detailed submittals are made.