



Kirki-ast

Department of Energy
Albuquerque Operations
Los Alamos Area Office
Los Alamos, New Mexico 87544

SEP 14 1987

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SEP 16 1987
EID DIRECTOR'S OFFICE

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Michael Burkhardt, Director
N.M. Environmental Improvement Division
P. O. Box 968
Santa Fe, New Mexico 87504

RECEIVED
SEP 21 1987
HAZARDOUS WASTE SECTION

Dear Mr. Burkhardt:

This letter responds to your Public Notice No. 14, dated August 14, 1987, for closure of container storage areas located at Technical Area (TA) 40-2, TA-22-24 and TA-3-102. Although the public notice has been issued, there are still errors that need to be corrected to reflect the situation that exists at the Los Alamos National Laboratory.

COMMENTS ON FACT SHEET FOR ta-3-102

Page 1, Facility Name: TA-3-102 is not a magazine and should properly be called a container storage area. This storage area is in a corner of Room 118 in Building 102.

Page 1, Introduction, Paragraph 2, Line 4: The "storage unit" referred to should be considered "storage area." Unit implies a discrete facility, while this area is limited to a corner of a room in Building 102.

Page 2, Reasons Supporting Decision To Change TA-3-102 To Short Term Storage, Paragraph 1 Line 2 and Paragraph 2, Line 1: It should be noted that only the container storage area of Building 102 is involved and not the whole building.

Paragraph 2, Line 2: The first "waste" is a duplication of the second. This sentence should indicate that the storage area will be used for storage of both usable and waste lithium hydride. Therefore, the first "waste" should be deleted.

Page 3, Interim Status Activities, Paragraph 1, Lines 2 & 3: Delete sentence "Area TA-3's primary ... (HE) components." The primary activities at TA-3 is not as stated (i.e., development of high explosive components).

Line 4: After "Area 3 Building 102" insert "container storage area." Same reasons as above.

Line 4: Delete "and contaminated" after LiH. This clarifies that the only hazardous waste concern is the lithium hydride.



TC

SEP 14 1997

Mr. Michael Burkhart

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The Department of Energy (DOE) fully supports closure of these hazardous waste management facilities. The DOE feels that the procedures detailed in each closure plan meet and in some cases exceed requirements in New Mexico's Hazardous Waste Management Regulations (HWMR-3) for interim status facilities. With approval of these closure plans, verification and certification for termination and elimination of these three hazardous waste management facilities can take place.

The Environmental Improvement Division as well as the public can be certain that the highest standards will be applied during closure of these facilities. The DOE and the Laboratory can assure that no harm to human health or the environment will result from these actions.

Sincerely,



Harold E. Valencia
Area Manager

cc:

A. Tiedman, ADS, LANL, MS A120

J. Aragon, HSE-DO, LANL, MS K491

T. Gunderson (HSE-87-951, AI#104, 8-31), LANL, MS K490