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TA 14

LANL Current Part A

Interim Status

June 27, 1985

Date of Notice

11/1/84	S01	2300 gallons storage
	TA-54	Area L
	SM 102	Room 118 A (Lithium hydride)
11/1/84	T04	unspecified capacity thermal treatment
	TA-14	Possible destruction sites
	TA-15	Possible destruction sites
	TA-16	S Site burn pits
	TA-36	Possible destruction sites
	TA-39	Possible destruction sites
	TA-40	Possible destruction sites
10/7/83	D80	1600 Acre feet disposal land fill
	TA-54	Area L chemical waste disposal
	TA-54	Area Gradwaste, mixed waste, PCB and abestos some chemicals
10/7/83	T01	1000 gal/day process tanks
	TA-50	Building I, 1000 gal/day
verbal approval	TA-54	Area L 6680 gallons, batch



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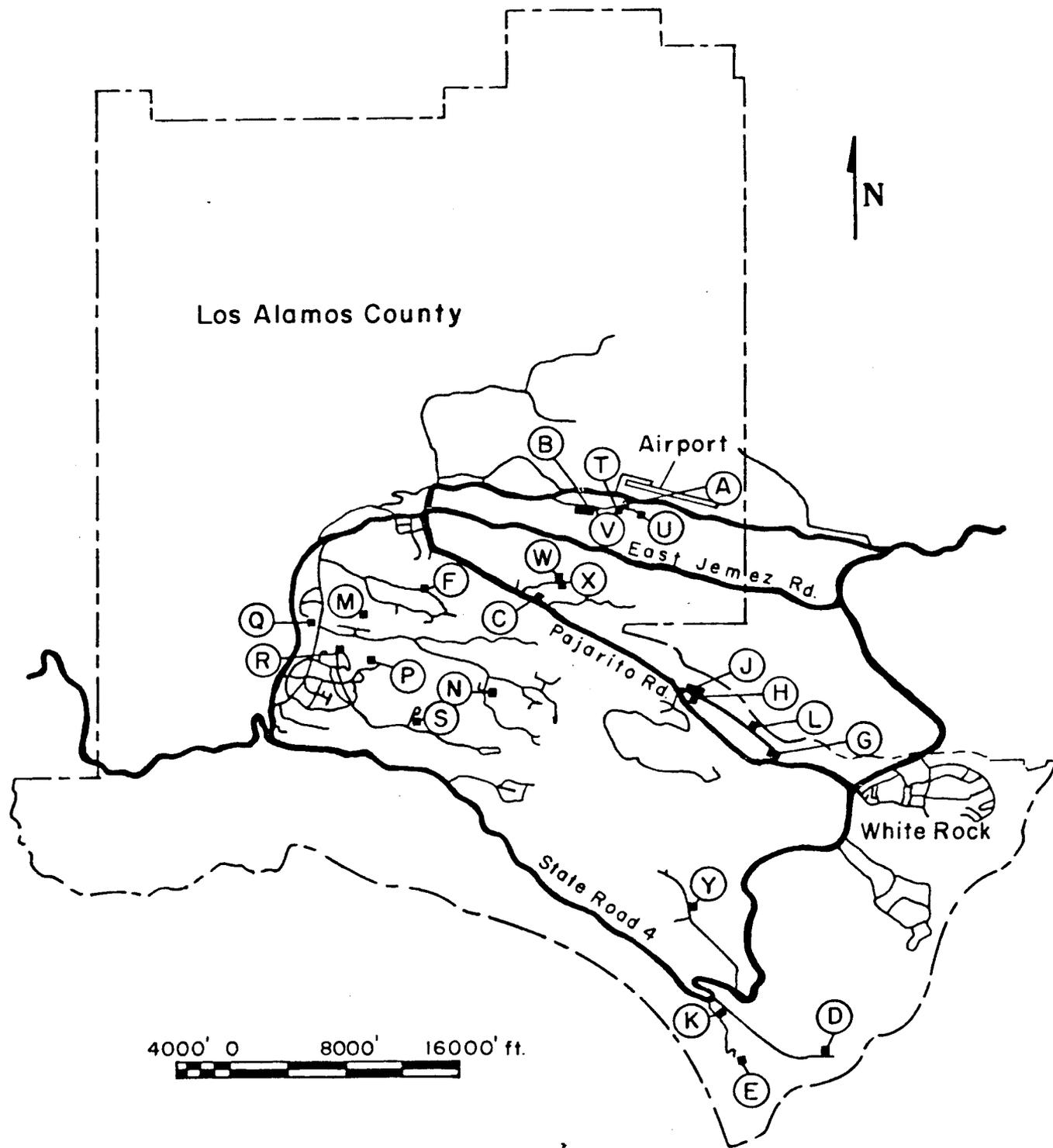


Fig. 1.
Map of Materials Disposal Areas.

TA-14

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TA-14
TA-15
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TA-54

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- o The maximum inventory of waste presented to TA-54 Area L is not adequate, as the volumes of waste and waste inventory are not addressed for the disposal shaft area. Waste quantities for TA-16 Area P landfills are not known, but are estimated by comparison of pre-fill topographic maps to present topographic maps [40 CFR 265.112].
- o The closure plan for TA-16 Area P was submitted 24 days after termination of interim status [40 CFR 165.112 requires submittal within 15 days]. The dates of submittal for other closure plans were not provided.
- o The closure plan for TA-54 Area L states that closure activities will be completed in approximately 5 years after initiation [40 CFR 265.113(b) requires 180 days].
- o Final disposal or decontamination of facility equipment is not addressed for TA-16 Area P [40 CFR 265.114].
- o Groundwater monitoring for TA-54 Area L is planned for wells located in Pajarito Canyon and Canada Del Buey. The location of the wells relative to the waste management facility is not provided in the plan [40 CFR 265.118(a)(1) and 265.91(a)]. The frequency of groundwater sampling and analysis is addressed for the first year. Groundwater monitoring for the following years is not addressed [40 CFR 265.118(a)(1) and 265.92(d)(2)].
- o Groundwater monitoring at TA-6 Area P is proposed on an annual basis after the first year. Monitoring is required on a semi-annual basis for every year following the first year [40 CFR 265.118(a)(1), 265.117(a)(i) and 265.92(d)(2)].
- o Post-closure use of the property is not addressed for TA-54 Area L or TA-16 Area P [40 CFR 265.117(c)].

In addition to the above deficiencies, the contractor had the following comments regarding the referenced units.

TA-16 Area P Landfill (Western Portion). Previous site activities preclude the emplacement of a final cover [40 CFR 265.310(a)]. This may not be considered a deficiency. The justification for not placing a final cover is the suspected explosive reactivity of the landfill. As stated in 40 CFR 265.312, "reactive wastes must not be placed in a landfill, unless the waste has been treated, rendered, or mixed before or immediately after placement in a landfill so that ... the resulting waste, mixture ... no longer meets the definition of ... reactive waste under ... 40 CFR 261.23," and the reactive waste is protected against accidental reaction.

TA-16 Area P Landfill (Eastern Portion). Protection and maintenance of surveyed benchmarks are not addressed [40 CFR 265.310(b)(4)].

Restriction of access during the post-closure care period at the site is not addressed [40 CFR 265.117(b)].

TA-50 Incinerator. The closure requirements for the TA-50 incinerator are not adequately addressed [40 CFR 265.351]. If the decontamination activities for the facility are dictated by the nature and level of radioactive contamination, a discussion of the various radioactive levels, and their respective decontamination and removal plans should be included in the plan.

Additional documentation regarding facility activities and closure activities are needed in order to justify a three-year decommissioning and final disposal time period.

TA-14, TA-15, TA-36, TA-39 Thermal Treatment. The use of Inductively Coupled Plasma (ICP) techniques for analyses of As, Ba, Cd, Cr, Pb, Hg, Se, and Ag may not be the appropriate analytical technique. Flame or furnace atomic absorption techniques are specified in SW-846 EP toxicity analyses of these metals.

In addition to the contractors findings, EPA submits the following comments:

- o Regarding the TA-16 Area P landfill, data should be provided to evaluate the severity or potential or detonation of the landfill. Other options for the emplacement of a final cover without the use of heavy equipment should be evaluated.